State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
LORAIN COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 02-13577

DATE: 6/28/00

Browning-Ferris Industries of Ohio Inc
David Matthews
43502 Oberlin-Elyria Rd
Oberlin, OH 44074

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, buy it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **NEDO**

FINAL PERMIT TO INSTALL 02-13577

Application Number:	02-13577
APS Premise Number:	0247000760
Permit Fee:	**$1200**
Name of Facility:	Browning-Ferris Industries of Ohio Inc
Person to Contact:	David Matthews
Address:	43502 Oberlin-Elyria Rd Oberlin, OH 44074

Location of proposed air contaminant source(s) [emissions unit(s)]:
43502 Oberlin-Elyria Rd
Oberlin, Ohio

Description of proposed emissions unit(s):
Horizontal and vertical expansion of Lorain County II Landfill to increase the site's refuse capacity.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Particulate	58.89
Carbon Monoxide	143.5
Sulfur Dioxide	16.20
Nitrogen Oxides	35.90
Non-methane Organic Compounds	14.00
Hydrogen Chloride	35.20

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Emissions Unit ID: F001

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - Landfill Roadways and Parking Areas (modification)	OAC rule 3745-31-05 (A)(3)	No visible emissions from any unpaved roadway or unpaved parking area except for a period of time not to exceed three minutes during any sixty-minute observation period. No visible emissions from any paved roadway or paved parking area except for a period of time not to exceed one minute during any sixty-minute observation period. Particulate emissions: 34.50 tons per year.
	OAC rule 3745-17-08	This rule shall not apply, per OAC 3745-17-08 (A)(1).
	OAC rule 3745-17-07	This rule shall not apply, per OAC 3745-17-07 (B)(ii)(d).

2. Additional Terms and Conditions

2.a The paved roadways and paved parking areas that are covered by this permit and subject to the requirements of OAC 3745-31-05 are listed below:

Paved Roadways

All roadways at active landfills

Paved Parking Areas

All parking areas at active landfills

2.b The unpaved roadways and unpaved parking areas that are covered by this permit and subject to the requirements of OAC 3745-31-05 are listed below:

Unpaved Roadways

All unpaved roadways at active landfills

Unpaved Parking Areas

All unpaved parking areas at active landfills

2.c The permittee shall employ best available control measures on all paved roadways and paved parking areas for the purpose of ensuring compliance with the visible emission requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and paved parking areas by flushing with water or sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.d The permittee shall employ best available control measures on all unpaved roadways and unpaved parking areas for the purpose of ensuring compliance with the visible emission requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and unpaved parking areas by resurfacing with gravel and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the visible emission requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.f Any unpaved roadway or unpaved parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types

of dust suppressants, may be controlled with control measure(s) specified above for paved surfaces. Any unpaved roadway or unpaved parking area that takes the characteristics of a paved roadway or paved parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and unpaved parking areas. Any unpaved roadway or unpaved parking area that is paved shall be subject to the visible emission limitation for paved roadways and paved parking areas.

2.g The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth an/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

2.h Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

2.i Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

II. Operational Restrictions

1. Used oil as defined by OAC rule 3745-279-01 (A)(12) shall not be used as a dust suppressant.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

Unpaved roadways and parking areas	**minimum inspection frequency**
All unpaved roadways and parking areas	daily

Paved roadways and parking areas	**minimum inspection frequency**
All paved roadways and parking areas	daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:

   a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

   c. The dates the control measures were implemented; and,

   d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

   The information required in 4.d shall be kept separately for (i) the paved roadways and paved parking areas and (ii) the unpaved roadways and unpaved parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

   a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation for the unpaved roadways and unpaved parking areas

identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

2. Emission Limit: Particulate emissions shall not exceed 34.50 tons per year.

Applicable Compliance Method: Compliance shall be determined by the following equations as they appeared in AP-42 sections 13.2.1 and 13.2.2, paved roads and unpaved roads versions 1/96 and 9/98; respectively:

Unpaved Roadways and Unpaved Parking Areas

$EU = \{[k \times (s/12)^{0.8} \times (W/3)^{0.5}]/(M/0.2)^{0.4}\} \times [(365-p)/365] \times VMT/2000 \times (1 - 0.9)$ where,

E**U** = emission rate (tons per year)
k = coefficient for particulate emissions, (10)
s = silt content (6.4%), Table 13.2.2-1
W = average vehicle weight (tons)
M = moisture content (0.2), default
p = number of days with at least 0.01 inches of precipitation per year (150)
VMT = vehicular miles traveled (miles per year)
2000 = conversion factor (pounds per ton)
0.9 = estimated control efficiency from resurfacing, watering, and speed reduction

Paved Roadways and Paved Parking Areas

$EP = k \times (sL/2)^{0.65} \times (W/3)^{1.5} \times VMT/2000 \times (1 - 0.9)$ Where

EP = emission rate (tons year)
k = emission factor for particulate emissions, (0.082 pounds per VMT)
sL = silt loading, 7.4 g/m^2
W = average vehicular weight, tons
VMT = vehicular miles traveled (miles per year)
2000 = conversion factor (pounds per ton)
0.9 = estimated control efficiency from flushing and sweeping

Total Emissions

ET = EU + EP where:

ET = total emissions from landfill roadways and parking areas (tons per year)
EU = emissions from unpaved roadways and parking areas (tons per year)
EP = emissions from paved roadways and parking areas (tons per year)

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - Landfill Roadways and Parking Areas	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F002 - Modification to Landfill Operations to include "Northern Expansion". Landfill gas is controlled by use of an enclosed combustor	OAC rule 3745-31-05 (A)(3)	Visible particulate emissions from this emissions unit shall not exceed 10 percent opacity as a six-minute average. (From both the enclosed flare and fugitive dust emissions)
Fugitive Emissions		Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. (See sections A.I.2.a through A.I.2.f)
		Particulate emissions: 3.10 tons per year.
	OAC rule 3745-17-08(B)(6)	Less stringent than limit established by OAC rule 3745-31-05.
	OAC rule 3745-17-07(B)(1)	Less stringent than limit established by OAC rule 3745-31-05.
	40 CFR Part 60, Subpart WWW	See section A.I.2.g through A.I.2.j
Enclosed Combustor	OAC rule 3745-31-05 (A)(3)	Nitrogen Oxide emissions shall not exceed 8.19 pounds per hour; 35.9 tons per year.
		Sulfur Dioxide emissions shall not exceed 3.70 pounds per hour; 16.20 tons per

year.

Carbon Monoxide emissions shall not exceed 32.75 pounds per hour; 143.5 tons per year.

Hydrogen Chloride emissions shall not exceed 8.04 pounds per hour; 35.20 tons per year.

Particulate emissions shall not exceed 2.69 pounds per hour; 11.8 tons per year.

Non-methane Organic Compound emission shall not exceed 3.19 pounds per hour; 14.0 tons per year.

2. Additional Terms and Conditions

2.a The landfill areas that are covered by this permit and subject to the requirements of OAC 3745-31-05 are listed below:

Landfill area permitted under DSIWM permit number 02-1170 and 02-8972, also known as Lorain County Landfill #2.

Landfill area permitted under DSIWM permit number 02-12176, also known as Lorain County Landfill Northern Expansion.

2.b The permittee shall employ best available control measures on all landfill operations associated with the load-in of MSW for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to watering of dusty materials, either prior to dumping or during dumping, and good operating practices to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c The above-mentioned control measures shall be employed for each MSW landfill cell if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that

use of the measures is unnecessary.

2.d The permittee shall employ best available control measures for wind erosion from the surface of the landfill for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to watering dusty loads prior to dumping during periods of high wind speed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The above-mentioned control measures shall be employed for wind erosion from the landfill if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for the landfill cell that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

2.f Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

2.g The active collection system shall satisfy the following requirements, as specified in 40 CFR Part 60.752(b)(2)(ii)(A):

i. The system shall be designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment.

ii. The system shall collect gas from each area, cell, or group of cells in the landfill in which the initial waste has been placed for a period of 5 years or more if active, or 2 years or more if closed or at final grade.

iii. The system shall collect gas at a sufficient extraction rate.

iv. The system shall be designed to minimize off-site migration of subsurface gas.

2.h The collected gas shall be vented to an enclosed combustor designed and operated as follows:

The enclosed combustor shall either reduce non-methane organic compounds (NMOC) by 98 weight percent or reduce the outlet NMOC concentration to less than 20 parts per

million by volume, dry basis as hexane at three percent oxygen.

2.i The collection and control system may be capped or removed provided that all of the following conditions, as specified in 40 CFR Part 60.752(b)(2)(v), are met:

i. The landfill shall be no longer accepting solid waste and be permanently closed (pursuant to 40 CFR Part 258.60).

ii. The collection and control system shall have been in operation a minimum of 15 years.

iii. The calculated NMOC gas produced by the landfill shall be less than 55 tons per year on three successive test dates. The test dates shall be no less than 90 days apart, and no more than 180 days apart.

2.j Each well shall be installed within 60 days of the date in which the initial solid waste has been in place for a period of:

i. 5 years or more if active; or

ii. 2 years or more if closed or at final grade.

II. Operational Restrictions

1. There shall be no open burning, in violation of OAC Chapter 3745-19, at this facility.

2. The permittee shall not accept or dispose of any friable asbestos or friable asbestos containing materials. The receipt of any friable asbestos or friable asbestos containing waste without proper approval of the Ohio EPA is a violation of the NESHAP foe Asbestos (40 CFR 61, Subpart M) and OAC Chapter 3745-31.

3. The permittee shall operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been placed for 5 years or more if active, or for 2 years or more if closed or at final grade.

4. The permittee shall operate the collection system with negative pressure at each wellhead except under the following conditions:

a. A fire or increased well temperature. (The permittee shall record instances when positive pressure occurs in efforts to avoid a fire)

b. Use of a geomembrane or synthetic cover. (The permittee shall develop acceptable pressure limits in the design plan.)

c. A decommissioned well. (A well may experience a static positive pressure after shutdown

to accommodate for declining flows. All design changes shall be approved by the Northeast District Office of the Ohio EPA.)

5. The permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Centigrade and either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The permittee may establish a higher operating temperature, nitrogen, or oxygen value at particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methogens.

If a well exceeds one of these parameters, action shall be initiated to correct the exceedance within 15 calendar days. If the correction can not be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance, unless the reason for the exceedance is listed above in section A.II.2 of this permit.

6. The permittee shall operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill.

7. The permittee shall operate the collection system such that all collected gases are vented to a control system designed and operated in compliance with section A.I.2.h of this permit. In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within one hour.

8. The permittee shall operate the enclosed combustion device at all times when the collected gas is routed to the system.

9. The average combustion temperature within the enclosed combustor , for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1370 degrees Fahrenheit.

10. The total quantity of landfill gas burned in the enclosed combustor shall not exceed 3000 standard cubic feet per minute.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each MSW landfill cell in accordance with the following frequencies:

Landfill Cell Identification **Minimum load-in inspection frequency**

Active cell(s)	Daily

2. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from MSW landfill cell surfaces in accordance with the following frequencies:

Landfill Cell Identification	**Minimum Wind Erosion Inspection Frequency**
Active cell(s)	Daily
Closed cell(s)	Weekly

3. No inspection shall be necessary for wind erosion from the surface of a MSW landfill cell when the cell is covered with snow and/or ice and for any landfill cell activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-mentioned events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

4. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in of a MSW landfill cell, and wind erosion from the surface of a MSW landfill cell. The inspections shall be performed during representative, normal landfill operating conditions.

5. The permittee may, upon receipt of written approval from the Northeast District Office of the Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

6. The permittee shall maintain records of the following information:

   a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

   c. the dates the control measures were implemented; and

   d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from landfill surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

   The information required in 6.d shall be kept separately for (i) the load-in operation, and (ii) the landfill surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

7. The permittee shall annually record the amount of MSW waste deposited.

8. For the active gas collection system, the permittee shall install a sampling port and a thermometer or other temperature measuring devices, or an access port for temperature measurements at each wellhead and record the following information on a monthly basis:

   a. the gauge pressure in the gas collection header at each individual well;

   b. the nitrogen or oxygen concentration in the landfill gas; and

   c. the temperature of the landfill gas.

9. The permittee shall monitor surface concentrations of methane on a quarterly basis as follows:

   a. Monitor surface concentrations of methane along the entire parameter of the collection area and along a serpentine pattern spaced 30 meters apart (or a site-specific established spacing) for each collection area.

   b. The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.

   c. Surface emissions monitoring shall be performed in accordance with section 4.3.1 of Method 21 of Appendix A of 40 CFR, Part 60, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.

   d. Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the actions specified below shall be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements listed in A.II.6:

      i. The location of each monitored exceedance shall be marked and the location recorded.

      ii. Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be remonitored within 10 calendar days of detecting the exceedance.

      iii. If the remonitoring of the location shows a second exceedance, additional

corrective action shall be taken and the location shall be monitored again within 10 days of the second exceedance. If the remonitoring shows a third exceedance for the same location, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Ohio EPA for approval. No further monitoring of that location is required until the action specified has been taken.

iv. Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10 day remonitoring specified above shall be remonitored one month from the initial exceedance. If the one month remonitoring shows a concentration less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the one month remonitoring shows an exceedance, the actions specified above shall be taken.

10. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the enclosed combustor when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

11. For the enclosed combustor, the permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a gas flow rate measuring device that provides a measurement of gas flow to the control device. The gas flow shall be recorded at least every 15 minutes.

12. If a gas flow measuring device is not installed then the permittee shall secure the bypass line valve in the closed position with a car-seal or a lock and key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

13. The permittee shall maintain the following information for the life of the control equipment as measured during the initial performance test or compliance demonstration:

a. The maximum expected gas generation flow rate as calculated based on the following:

i. For sites with unknown year-to-year solid waste acceptance rates:

$Q_m = 2 \times L_o \times R \times \{(e \text{ to the power } -kc) - (e \text{ to the power } -kt)\}$ where,

Q_m = maximum expected gas generation flow rate, cubic meters per year.
L_o = methane generation potential, cubic meters per megagram solid waste.
R = average annual acceptance rate, megagrams per year.

k = methane generation rate constant, per year.
t = age of the landfill at equipment installation plus the time the owner or operator intends to use the gas mover equipment or active life of the landfill, whichever is less (If the equipment is installed after closure, t is the age of the landfill at installation), years.
c = time since closure, years (for an active landfill c = 0 and (e to the power -kc) = 1).

ii. For sites with known year-to-year solid waste acceptance rate:

Q_m = Summation of {2 x k x L_o x M_i x (e to the power -kti for i = 1 through i = n)

where,

Q_m = maximum expected gas generation flow rate, cubic meters per year.
k = methane generation rate constant, per year.
L_o = methane generation potential, cubic meters per megagram solid waste.
M_i = mass of solid waste in the i th section, megagrams.
t_i = age of the i th section, years.

iii. If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, the equations in paragraph A.III.12.i. or ii. If the landfill is still accepting waste, the actual measured flow rate will not equal the maximum expected gas generation rate, so calculations using the equations in paragraph A.III.12.i. or ii. or other methods shall be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment. (The permittee may use another method to determine the maximum gas generation flow rate, if the method has been approved by the Ohio EPA);

b. The density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR Part 60.759(a)(1);

c. The percent reduction of NMOC achieved by the enclosed combustion device; and

d. The gas flow rate or bypass flow rate measurements.

14. The permittee shall keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and provide an unique location label for each collector.

15. The permittee shall keep for the life of the collection system an up-to-date, readily accessible, on-site records of the maximum design capacity of the landfill, the current amount of solid waste in place;

and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either hardcopy or electronic formats are acceptable. These records, may be also required by the Ohio EPA, Division of Solid and Infectious Waste Management, and shall satisfy this permit condition.

16. The permittee shall conduct surface testing around the perimeter of the collection area along a pattern that traverses the landfill at 30-meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover.

17. The permittee shall monthly monitor the gauge pressure in the gas collection header at each wellhead. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the conditions noted in A.II.4 of this permit. If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measures shall not cause exceedances of other operational or performance standards.

18. The permittee shall collect and record, each day, all 3-hour blocks of time during which the average combustion temperature within the enclosed combustor was less than 1370 degrees Fahrenheit.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

3. Any breakdown or malfunction of the landfill gas collection system resulting in the emission of raw landfill gas emissions to the atmosphere shall be reported to the Northeast District Office of the Ohio EPA within one hour after the occurrence, or as soon as reasonably possible, and immediate remedial measures shall be undertaken to correct the problem and prevent further emissions to the atmosphere.

4. The permittee shall submit a closure report to the Northeast District Office of the Ohio EPA within 30 days of waste acceptance cessation. The Ohio EPA may request additional information as may

be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR Part 258.60. If a closure report has been submitted to the Ohio EPA, no additional wastes may be placed into the landfill without filing a notification of modification as described in 40 CFR Part 60.7(a)(4).

5. The permittee shall submit an equipment removal report to the Northeast District Office of the Ohio EPA, 30 days prior to removal or cessation of operation of the control equipment. The equipment removal report shall contain the information specified in 40 CFR Part 60.757(e)(1). The Ohio EPA may request additional information as may be necessary to verify that all of the conditions for removal in 40 CFR Part 60.752(b)(2)(v) have been met.

6. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:

a. Any record which indicates that the gauge pressure in the gas collection header at each individual well was positive, after actions specified in A.III.16 are taken;

b. Any record which indicates that the nitrogen or oxygen concentration in the landfill gas was greater than 20% or 5%, respectively, unless the conditions of A.II.5 are met;

c. Any record which indicates that the temperature of the landfill gas was greater than 55 degrees Celsius, unless the conditions of A.II.5 are met;

d. Any record which indicates that the surface concentration of methane was greater than 500 parts per million above background, after actions specified in A.III.9 are taken;

e. All periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow or any record which indicates that the bypass line was not maintained in the closed position; and

f. All 3-hour periods of operation during which the average combustion temperature was 1370 degrees Fahrenheit or less.

7. The permittee shall submit annual reports which include the following:

a. All period when the collection system was not operating in excess of 5 days;

b. Any record indicating the date of installation and the location of each well or collection system expansion added pursuant to 40 CFR 60.755(a)(3), (b), and (c)(4); and

c. The description and duration of all periods when the enclosed combustion device was not operating for a period exceeding 1-hour.

These reports shall be submitted by January 31 of each year.

8. The permittee shall submit the following information with the initial performance test report required pursuant to 40 CFR Part 60.8:

a. A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, or other gas extraction devices, including the locations of any areas excluded from the collection and the proposed sites for the future collection system expansion;

b. The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based;

c. The documentation of the presence of asbestos or nondegradable material for each area from which collection wells have been excluded based on the presence of asbestos or nondegradable material;

d. The sum of the gas generation flow rate for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area;

e. The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill; and

f. The provisions for the control of off-site migration.

V. Testing Requirements

1. Compliance with the visible emission limitations for the landfill surfaces and enclosed combustor identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

2. Emission Limit: 2.69 pounds per hour of particulate emissions from enclosed combustor.

Applicable Compliance Method: Compliance shall be determined by the following equation:

E = (17 x F x 0.5 x 60)/1E6 Where:

E = emission rate (pounds per hour)
17 = emission factor from AP-42, section 2.4, Municipal Solid Waste Landfills, version 11/98 (lbs. PE/million cubic

feet of methane)
F = average flow rate of landfill gas into enclosed combustor (dscf)
0.5 = assumes 50% of landfill gas is methane
60 = conversion factor (minutes/hour)
1E6 = part of emission factor associated with AP-42

3. Emission Limit: 11.8 tons per year of particulate emissions from enclosed combustor.

Applicable Compliance Method: Compliance shall be determined by multiplying the pounds per hour calculated above by 8760 (hours per year) and dividing by 2000 (pounds per ton).

4. Emission Limit: 8.19 pounds per hour of nitrogen oxides emissions from enclosed combustor.

Applicable Compliance Method: Compliance shall be determined by using the following equation:

E = (40 x F x 0.5 x 60)/ 1E 6 Where:

E = emission rate (pounds per hour)
40 = emission factor from AP-42, section 2.4, Municipal Solid Waste Landfills (lbs. NO_X/million cubic feet of methane)
F = Average flow rate of landfill gas into the enclosed combustor (dscfm)
0.5 = assumes 50% of landfill gas is methane
60 = conversion factor (min/hour)
1E 6 = part of emission factor associated with AP-42

5. Emission Limit: 35.9 tons per year of nitrogen oxide

Applicable Compliance Method: Compliance shall be determined by multiplying the pounds per hour calculated above by 8760 (hours per year) and dividing by 2000 (pounds per ton).

6. Emission Limit: 3.70 pounds per hour of sulfur dioxide emissions from enclosed combustor.

Applicable Compliance Method: Compliance shall be determined by using the following equation:

E = (8.14E-6 x F x 0.5 x 60)/ 1E 6 Where:

E = emission rate (pounds per hour)
8.14E-6 = emission factor from AP-42, section 2.4,

Municipal Solid Waste Landfills (lbs. SO_x/million cubic feet of methane)
F = Average flow rate of landfill gas into the enclosed combustor (dscfm)
0.5 = assumes 50% of landfill gas is methane
60 = conversion factor (min/hour)
1E 6 = part of emission factor associated with AP-42

7. Emission Limit: 16.2 tons per year of sulfur dioxide emissions.

Applicable Compliance Method: Compliance shall be determined by multiplying the pounds per hour calculated above by 8760 (hours per year) and dividing by 2000 (pounds per ton).

8. Emission Limit: 32.75 pounds per hour of carbon monoxide emissions from enclosed combustor.

Applicable Compliance Method: Compliance shall be determined by Method 10 of 40 CFR Part 60, Appendix A, if required by the Ohio EPA.

9. Emission Limit: 143.5 tons per year of carbon monoxide emissions.

Applicable Compliance Method: Compliance shall be determined by multiplying the allowable emission rate 8760 (hours per year) and dividing by 2000 (pounds per ton).

10. Emission Limit: 3.19 pounds per hour of non-methane organic compound emissions from enclosed combustor.

Applicable Compliance Method: Compliance shall be determined by Method 25 or Method 25A of 40 CFR Part 60, Appendix A.

11. Emission Limit: 14.0 tons per year of non-methane organic compound emissions.

Applicable Compliance Method: Compliance shall be determined by multiplying the allowable emission rate by 8760 (hours per year) and dividing by 2000 (pounds per ton).

12. Emission Limit: 8.04 pounds per hour of hydrogen chloride emissions from enclosed combustor.

Applicable Compliance Method: Compliance shall be determined by Method 26 or Method 26A of 40 CFR Part 60, Appendix A.

13. Emission Limit: 35.2 tons per year of hydrogen chloride emission.

Applicable Compliance Method: Compliance shall be determined by multiplying the allowable emission rate by 8760 (hours per year) and dividing by 2000 (pounds per ton).

14 Emission Limit: 3.10 tons per year of particulate matter from landfill surface.

Applicable Compliance Method: Compliance shall be determined by adding the results of the following equations:

For Waste Handling: AP-42, section 13.2.4, Aggregate Handling and Storage Piles, version 1/95.

EWH = {[k x 0.0032 (U/5) 1.3]/ (M/2)1.4} x TPY/2000
where:

EWH = emission rate from landfill operations, tons per year
k = particulate emissions coefficient, 0.74
U = mean wind speed in mph, 7
M = moisture content, 14%
TPY = waste acceptance rate, tons per year.
2000 = conversion factor, pounds per ton.

For Wind Erosion

EWE = 1.7 x S/1.5 x [(365-p)/235] x (f/15) x A x365 x 2000 where:

EWE = emission rate from wind erosion, tons per year
S = silt content, 5.2
p = # of days with less than 0.01 inch of precipitation, 150
f = % time wind speed exceeds 12 mph, 40%
A = surface area of landfill in acres, 91
365 = number of days per year
2000 = pounds per ton

Total Emissions

E = EWH + EWE where:

E = total emissions from emission unit, tons per year
EWH = emissions from landfill operations, tons per year
EWE = emissions from wind erosion, tons per year

15. The nitrogen level shall be determined using Method 3C of 40 CFR Part 60, Appendix A, unless an alternative test method is established as allowed by 40 CFR Part 60.752 (b)(2)(i).

16. The oxygen level shall be determined by an oxygen meter using Method 3A of 40 CFR Part 60, Appendix A, unless an alternative test method is established as allowed by 40 CFR Part 60.752 (b)(2)(i), except that:

a. The span shall be set so that the regulatory limit is between 20% and 50% of the span;

b. A data recorder is not required;

c. Only two calibration gases are required, a zero and span, and ambient air may be used as the span;

d. A calibration error check is not required ; and

e. The allowable sample bias, zero drift, and calibration drift are plus or minus 10%.

17. After installation of a collection and control system in compliance with 40 CFR Part 60.755, the permittee shall calculate the NMOC emission rate for the purpose of determining when the system can be removed as provided in 40 CFR Part 60.752 (B)(2)(v) in accordance with the equation and procedures specified in 40 CFR Part 60.754(b), (b)(1), and (b)(2). The permittee may use another method to determine landfill gas flow rate and NMOC concentration if the method has been approved by the Ohio EPA as provided in 40 CFR Part 60.752(b)(2)(i)(B).

18. To ensure compliance with the reduction of NMOC emissions by 98 weight percent or the reduction of NMOC outlet concentrations to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen, Method 25, 25A, or Method 18 of 40 CFR Part 60, Appendix A shall be employed. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA Northeast District Office.

19. The surface methane background concentration shall be determined by the following:

a. Use of an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications of 40 CFR 60.755(d);

b. Moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter of the wells;

c. In accordance with Method 21, Section 4.3.1 of 40 CFR 60, Appendix A, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground; and

d. Monitoring shall be performed during typical meteorological conditions.

20. The flow rate of landfill gas shall be determined by measuring the total landfill gas flow rate at the common header pipe that leads to the enclosed combustion device using a gas flow measuring device calibrated according to the provisions of section 4 of Method 2E of Appendix A of 40 CFR Part 60.

21. The average NMOC concentration shall be determined by collecting and analyzing landfill gas sampled from the common header pipe before the gas moving or condensate removal equipment, using the procedures in Method 25C or Method 18 of 40 CFR 60, Appendix A.

22. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the reduction of NMOC by 98 weight percent or reduce the NMOC outlet concentration to less than 20 parts per million by volume, dry basis as hexane at three percent oxygen, the allowable emission rate for hydrogen chloride, and the allowable emission rate for carbon monoxide.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for NMOC, Method 25, 25A, or Method 18 of 40 CFR Part 60, Appendix A; for Hydrogen Chloride, Method 26 of 40 CFR Part 60, Appendix A; for Carbon Monoxide Method 10 of 40 CFR Part 60, Appendix A. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA Northeast District Office be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by

the person or persons responsible for the tests and submitted to the Northeast District Office of the Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

1. Pursuant to the authority in OAC 3745-77-07 (C)(2) or ORC Section 3704.03 (L), any representative of the Director may, upon presentation of proper identification, enter at any reasonable time upon any portion of the property where this landfill is located, including any improvements thereon, to make inspections, take samples, conduct tests and examine records or reports pertaining to any emissions of air contaminants and any monitoring equipment, emissions control equipment or methods. No operator or agent of this landfill shall act in any manner to refuse, hinder, or thwart this legal right of entry.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F002 - Landfill Operations (Northern Expansion to the existing landfill)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the hydrogen chloride emission limitation specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on the data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the TSCREEN model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

   Pollutant: Hydrogen chloride

   TLV (ug/m3): 5530
   Maximum Hourly Emission Rate (lbs/hr): 8.04
   Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2.692
   Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 132

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Northeast District Office of the Ohio EPA required, including the possible issuance of modifications to PTI number 02-13577 and the operating permit:

a. Any changes that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table.

b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.

c. A reduction in the TLV by the ACGIH at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC.

d. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the follow along with the applicable rules and/or requirements and with the applicable emissions limitations wing table and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
load-in and load-out of soil storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05 (A)(3)	no visible emissions except for one minute in any hour best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f)
wind erosion from soil storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05 (A)(3)	no visible emissions except for one minute in any hour best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f) Particulate emissions shall not exceed 9.49 tons per year from wind erosion and load-in and load-out operations.
	OAC rule 3745-17-08 (B)	This rule shall not apply, per OAC 3745-17-08 (A)(1).
	OAC rule 3745-17-07 (B)	This rule shall not apply, per OAC 3745-17-07 (B)(11)(e).

2. Additional Terms and Conditions

2.a The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

All soil stockpiles

2.b The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain low pile heights and to process material with an inherently high moisture content to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

2.d The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to providing wind guards to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

2.f Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-in inspection frequency
Soil stockpiles	Daily

2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-out inspection frequency
Soil stockpiles	Daily

3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification	minimum wind erosion inspection frequency
Soil stockpiles	Daily

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the

above-mentioned applicable requirements.

7. The permittee shall maintain records of the following information:

   a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

   c. the dates the control measures were implemented; and

   d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

   The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

8. The permittee shall annually record the amount of clay soil received.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

a. Emission Limitation: Particulate emissions shall not exceed 9.49 tons per year.

Applicable Compliance Method: Compliance shall be determined by adding the results of the following equations, from RACM document Table 2.1.2-5 for wind erosion

$$E = (1.7 \times (s/15) \times [(365-p)/235] \times (f/15) \times 365 \times S \times N)/2000$$

Where:

E = emissions (tons of particulate emissions per year)
s = silt content, 41.4%
p = days with precipitation greater than 0.01 inches per year ,210
f = percent of unobstructed wind speed exceeding 12 mph , 30%
365 = conversion factor (days per year)
S = average pile surface area (assume 0.6 acre/pile)
N = number of storage piles

And for material handling from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, version 1/95.

$$E = [k \times 0.0032 \times (U/5)^{1.3}/(M/2)^{1.4}] \times TPY/2000$$ Where:

E = emission rate, tons per year
k = particulate emissions coefficient, 0.74
U = mean wind speed in mph, 7
M = moisture content, 14%
TPY = amount of aggregate handled, tons per year
2000 = conversion factor, pounds per ton

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F003 - Soil Stockpiles	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 02-13577 Facility ID: 0247000760

FACILITY NAME Browning-Ferris Industries of Ohio Inc

FACILITY DESCRIPTION Horizontal and vertical expansion of Lorain County II Landfill to increase the site's refuse capacity CITY/TWP Oberlin

SIC CODE 4953 SCC CODE 5-02-006-02 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION Landfill Roadways and Parking Areas

DATE INSTALLED 5/2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment		8.19		34.5
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: Visible emissions from unpaved roadways and unpaved parking area shall not exceed three minutes during any sixty minute observation period. Visible emissions from paved roadways and paved parking areas shall not exceed one minute during any sixty minute observation period.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-13577 Facility ID: 0247000760

FACILITY NAME Browning-Ferris Industries of Ohio Inc

FACILITY DESCRIPTION Horizontal and vertical expansion of Lorain CITY/TWP Oberlin

Emissions Unit ID: F003

SIC CODE 4953 SCC CODE 5-02-006-01 & 5-02-006-02 EMISSIONS UNIT ID F002

EMISSIONS UNIT DESCRIPTION Landfill Operations (Northern Expansion to the existing landfill)

DATE INSTALLED 5/2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.81	3.53, 3.10	2.69	11.8, 3.10
PM_{10}					
Sulfur Dioxide	attainment	1.11	4.86	3.70	16.2
Organic Compounds	attainment	0.06	0.26	3.19	14.0
Nitrogen Oxides	attainment	2.46	10.76	8.19	35.9
Carbon Monoxide	attainment	0.06	0.26	32.75	143.5
Lead					
Other: Air Toxics	hydrogen chloride	2.15	9.42	8.04	35.2

APPLICABLE FEDERAL RULES:

NSPS? Subpart WWW NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: Visible emissions shall not exceed 10 percent opacity as a six-minute average (From both the enclosed combustor and fugitive dust emissions). Compliance with Ohio EPA Air Toxics Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH)has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Hydrogen Chloride

NEW SOURCE REVIEW FORM B

PTI Number: 02-13577 Facility ID: 0247000760

FACILITY NAME Browning-Ferris Industries of Ohio Inc

FACILITY DESCRIPTION Horizontal and vertical expansion of Lorain CITY/TWP Oberlin

Emissions Unit ID: F003

SIC CODE 4953 SCC CODE 5-02-006-02 EMISSIONS UNIT ID F003

EMISSIONS UNIT DESCRIPTION Soil Stockpiles

DATE INSTALLED 5/2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment		9.49		9.49
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination: Visible emissions shall not exceed one minute during any sixty minute observation period.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-13577 Facility ID: 0247000760

FACILITY NAME Browning-Ferris Industries of Ohio Inc

FACILITY DESCRIPTION Horizontal and vertical expansion of Lorain CITY/TWP Oberlin

Emissions Unit ID: F003

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Calculations

Please provide any additional permit specific notes as you deem necessary:

This PTI is for an expansion at an existing landfill. The emissions from the enclosed combustor were previously permitted as emissions unit P001 under PTI 02-8382 and have been carried over to emissions unit F002. The only increase will be for particulate matter emissions, going from 11.8 tons per year to 58.89 tons per year. This is primarily from F001, facility roads.

Modeling results for Hydrogen Chloride, Nitrogen Oxides, and Carbon Monoxide emissions are included in the package.

We are requesting that this permit be issued draft only because this is a landfill and we want to allow public comment.

Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Particulate	58.89
Carbon Monoxide	143.5
Sulfur Dioxide	16.20
Nitrogen Oxides	35.90
Non-methane Organic Compounds	14.00
Hydrogen Chloride	35.20