Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/25/2012

Certified Mail

Facility ID: 0362010127
Permit Number: P0109921
County: Ottawa

Mr. Michael Dae
Ottawa County Landfill Gas Power Station
3322 West End Avenue
Suite 115
Nashville, TN 37203

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
Ottawa County Landfill Gas Power Station

Facility ID:	0362010127
Permit Number:	P0109921
Permit Type:	Renewal
Issued:	6/25/2012
Effective:	7/16/2012
Expiration:	7/16/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Ottawa County Landfill Gas Power Station

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Authorization

Facility ID: 0362010127
Facility Description: Electric Services
Application Number(s): A0044191
Permit Number: P0109921
Permit Description: Renewal Title V operating permit for a electric generating facility utilizing landfill gas.
Permit Type: Renewal
Issue Date: 6/25/2012
Effective Date: 7/16/2012
Expiration Date: 7/16/2017
Superseded Permit Number: P0106859

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Ottawa County Landfill Gas Power Station
530 North Camp Road
Port Clinton, OH 43452-9599

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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, in accordance with Standard Term and Condition A.11 below. 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; ora combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

(1) 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.

(2) 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 paragraph (E) of OAC rule 3745-77-03.

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

(4) 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:

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

(2) 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

28. 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.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. There are no insignificant emissions units listed by the applicant for this facility.

C. Emissions Unit Terms and Conditions

1. P004, landfill gas treatment system with thermal oxidizer

Operations, Property and/or Equipment Description:

Landfill gas treatment system with thermal oxidizer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 [PTI P0107159, issued 01/05/11]	0.08 lb nitrogen oxides (NOx)/mmBTU; 0.19 lbNOx/hr and 0.83 ton NOx/yr 0.20 lb carbon monoxide (CO)/mmBTU; 0.48 lb CO/hr and 2.1 tons CO/yr 0.04 lb particulate matter less than 10 microns in size (PM10)/hr; 0.18 ton PM10/yr 0.0029 lb non-methane organic compounds (NMOC)/hr; 0.013 ton NMOC/yr 2.06 lbs methane (CH4)/hr; 9.02 tons CH4/yr Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average, from the stack See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [PTI P0107159, issued 01/05/11]	See b)(2)b.
c.	40 CFR, Part 60, Subpart WWW	See b)(2)c.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO and PM10 emissions from this air contaminant source since the uncontrolled potential to emit for NOx, CO and PM10 is less than 10 tons/yr.

BAT requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, are not applicable to the NMOC and CH4 emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. NMOCs that are not VOCs and CH4 are air contaminants that do not involve as established NAAQS.

c. To demonstrate compliance with this rule, the permittee is routing the collected gas to a treatment system that processes the collected gas for subsequent sale or use pursuant to 40 CFR 60.752(b)(2)(iii)(A) or (B). The permittee has chosen to comply with 40 CFR 60.752(b)(2)(iii)(B) by using a control system that shall be designed and operated to reduce NMOC by 98 percent, or when an enclosed combustion device is used for control, to either reduce NMOC by 98 percent or reduce the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at 3 percent hydrogen.

c) Operational Restrictions

(1) The permittee has committed to compressing, filtering for particles up to 10 microns in diameter and dewatering the landfill gas (LFG) before it is processed through this emissions unit. Dewatering shall be defined as a reduction of the dew point of the LFG by at least 20 degrees Fahrenheit.

[OAC rule 3745-77-07(A)(1) and PTI P0107159]

(2) All of the emissions from the siloxane filter system shall be vented to a thermal oxidizer that shall meet the operational, monitoring and recordkeeping requirements of this permit.

[OAC rule 3745-77-07(A)(1) and PTI P0107159]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, calibrate and maintain a continuous device that monitors and records the temperature of the LFG prior to dewatering and after dewatering.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the filtration system when the controlled emission unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. A description of the corrective action taken;

g. The date corrective action was completed;

h. The date and time the deviation ended;

i. The total period of time (in minutes) during which there was a deviation;

j. The pressure drop readings immediately after the corrective action was implemented; and

k. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the filtration system is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(3) The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications devices on piping on the thermal oxidizer which completely shuts off gas flow to the thermal oxidizer when the thermal oxidizer is not operating.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(4) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable combustion temperature within the thermal oxidizer, during any period of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be less than 1400 degrees Fahrenheit.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(5) The permittee shall calibrate, maintain and operate according to the manufacturer's specifications, the following equipment.

a. A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of +/- 1 percent of the temperature being measured expressed in degrees Celsius or +/- 0.5 degrees Celsius, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:

i. All time periods, except during start-up and shutdown, during which the emissions unit was in operation and the thermal oxidizer inlet temperature was below the acceptable minimum.

ii. A log (date and total time) of the downtime or bypass of the capture (collection) system (serving the thermal oxidizer) and the thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

b. A device that records flow to or bypass of the control device. The permittee shall either:

i. Install, calibrate, and maintain a gas flow rate measuring device that shall record the LFG flow to the control device at least every 15 minutes; or

ii. 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.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(6) The permittee shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(7) Whenever the monitored combustion temperature within the thermal oxidizer drops below the minimum operating temperature, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. The date and time the deviation began;

b. The magnitude of the deviation at that time;

c. The date the investigation was conducted;

d. The name(s) of the personnel who conducted the investigation; and

e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. A description of the corrective action taken;

g. The date corrective action was completed;

h. The date and time the deviation ended;

i. The total period of time (in minutes) during which there was a deviation;

j. The temperature readings immediately after the corrective action was implemented; and

k. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. Each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range established in this permit;

b. Any period of time (start time and date, and end time and date) when the siloxane filter system was in operation and the process emissions were not vented to the thermal oxidizer;

c. Each incident of deviation described in e)(1)a. or e)(1)b. above where a prompt investigation was not conducted;

d. Each incident of deviation described in e)(1)a. or e)(1)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. Each incident of deviation described in e)(1)a. or e)(1)b. where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(2) The permittee shall submit quarterly summaries of the following records:

a. Each period of time (start time and date, and end time and date) when pressure drop across the filtration system was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. Any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the filtration system;

c. Each incident of deviation described in e)(2)a. above where a prompt investigation was not conducted;

d. Each incident of deviation described in e)(2)a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. Each incident of deviation described in e)(2)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(3) The permittee shall submit semiannual reports to the Ohio EPA, Northwest District Office, which identify the date(s) and duration when the temperature after dewatering exceeded the temperature prior to dewatering by less than 20 degrees Fahrenheit. These reports shall be submitted by January 31 and July 31 and shall cover the records for the previous calendar six months.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(4) The permittee shall submit semiannual reports to the Ohio EPA, Northwest District Office, which identify the date(s) and duration when the pressure drop across the filtration system was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration. These reports shall be submitted by January 31 and July 31 and shall cover the records for the previous calendar six months.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(5) Any breakdown or malfunction resulting in the emission of raw landfill gas (LFG) to the atmosphere shall be reported by telephone to the Northwest District Office of the Ohio EPA within one hour after the occurrence, or as soon as reasonably possible, and immediate remedial actions shall be undertaken to correct the problem and prevent further emissions to the atmosphere. A summary of the breakdown or malfunction, including the date(s) and time(s) and the measure(s) taken to correct the problem shall be included in the semi-annual deviation report.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

(6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the" Ohio EPA's eBusiness Center: Air Services" online web portal.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations</u>:

0.08 lbNOx/mmBTU; 0.19 lbNOx/hr

<u>Applicable Compliance Method</u>:

The lb/mmBTU emission limitation was an emission factor supplied by the manufacturer. Compliance with the hourly NOx emission limitation shall be determined by the following formula:

0.08 lbNOx/mmBTU x 2.4 mmBTU/hr= 0.19 lbNOx/hr

If required, compliance shall be determined in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

b. <u>Emission Limitation</u>:

0.83 ton NOx/yr

Applicable Compliance Method:

The annual NOx emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

c. Emission Limitations:

0.20 lb CO/mmBTU; 0.48 lb CO/hr

Applicable Compliance Method:

The lb/mmBTU emission limitation was an emission factor supplied by the manufacturer. Compliance with the hourly CO emission limitation shall be determined by the following formula:

0.20 lb CO/mmBTU x 2.4 mmBTU/hr= 0.48 lb CO/hr

If required, compliance shall be determined in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

d. Emission Limitation:

2.1 tons CO/yr

Applicable Compliance Method:

The annual CO emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

e. Emission Limitation:

0.04 lb PM10/hr

Applicable Compliance Method:

Compliance with the hourly PM10 emission limitation shall be determined by the following formula:

Emax (lb/hr)= (F)(Qmax)(C)

Emax= maximum hourly emissions
F= AP-42 emission factor (lb/mmdscf)
Qmax= Maximum hourly stack flow (mmdscf/hr)
C= Concentration of CH4 (%) (assuming 4% methane)

17 lb PM10/mmdscf mixed gases/hr x 4% CH4= 0.04 lb PM10/hr

If required, compliance shall be determined in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

f. Emission Limitation:

0.18 ton PM10/yr

Applicable Compliance Method:

The annual PM10 emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

g. Emission Limitation:

0.0029 lb NMOC/hr

Applicable Compliance Method:

Compliance with the hourly NMOC emission limitation shall be determined by the following formula:

Emax (lb/hr)= (E uncontrolled)(100%-DRE)
Euncontrolled= summation of VOCs from Table 3-2 (lb/hr)
DRE= destruction efficiency (%)

0.145 lb VOC/hr x (100%-98%)= 0.0029 lb NMOC/hr

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

h. Emission Limitation:

0.013 ton NMOC/yr

Applicable Compliance Method:

The annual NMOC emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

i. Emission Limitation:

2.06 lbs CH4/hr

Applicable Compliance Method:

Compliance with the hourly CH4 emission limitation shall be determined by the following formula:

Emax (lb/hr)= (Qmax)(C)(MW CH4)(lbmol/385.5 scf)(106/mmscf)(100%-DRE)

Qmax= Maximum hourly stack flow (mmdscf/hr)
C= Concentration of CH4 (%)
MW CH4= molecular weight of CH4 (lb/lbmol)
DRE= destruction efficiency (%)

0.062 mmscf mixed gases/hr x 4% CH4 x 16.04 lb CH4/lbmol x lbmol/385.5 scf x 10^6 scf/mmscf x (100%-98%)= 2.06 lb CH4/hr

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

j. Emission Limitation:

9.02 tons CH4/yr

Applicable Compliance Method:

The annual CH4 emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

k. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a six-minute average, from the stack

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0107159]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -IC Engines: P001,P002,P003

EU ID	Operations, Property and/or Equipment Description
P001	1400 bKW landfill gas fired engine
P002	1400 bKW landfill gas fired engine
P003	1400 bKW landfill gas fired engine

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI P0104534, issued 09/09/09]	5.84 lbs nitrogen oxides (NOx)/hr; 25.6 tons NOx/yr for each emissions unit 12.4 lbs carbon monoxide (CO)/hr; 54.3 tonsCO/yr for each emissions unit 0.68 lb non-methane organic compounds (NMOC)/hr; 3.0 tons NMOC/yr for each emissions unit 26.1 lbs methane (CH4)/hr; 114.3 tons CH4/yr for each emissions unit 0.20 lb sulfur dioxide (SO2)/hr; 0.9 ton SO2/yr for each emissions unit 3.8 tons particulate emissions (PE)/yr for each emissions unit Visible PE shall not exceed 10% opacity, as a six-minute average for each emissions unit See b)(2)a. and b)(2)b.

b.	40 CFR 60.752(b)(2)(iii)(C), Subpart WWW	Gas Treatment Requirements [See b)(2)c.]
c.	OAC rule 3745-17-11(B)(5)(b)	0.062 lb PE/mmBTU actual heat input
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-18-06(G)	See b(2)e.
f.	40 CFR 60.1-19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 60.1-19 apply. See b)(2)g. and b)(2)h.
g.	40 CFR 63.1930	Subpart AAAA [See b)(2)c.]
h.	40 CFR 63.1-15 (40 CFR 63.6665)	Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1-15 apply. See b)(2)h.ix.

(2) Additional Terms and Conditions

a. The requirements of this rule also includes compliance with the requirements of 40 CFR, Part 60, Subpart WWW; 40 CFR, Part 63, Subpart AAAA and OAC rule 3745-17-11(B)(5)(b). It should be noted that the emission limitations of OAC rule 3745-31-05(A)(3)(a) are more stringent than the emission limitations established pursuant to 40 CFR, Part 60, Subpart JJJJ [See b)(2)h.].

b. The Best Available Technology (BAT) requirements for this emissions unit have been determined to be the use of “lean burn technology” and compliance with the terms and conditions of this permit.

c. This facility has elected to comply with 40 CFR 60.752(b)(2)(iii) by routing the collected gas to a treatment system that processes the collected gas for subsequent sale or use in accordance with 60.752(b)(2)(iii)(C).

This facility has committed not to accept any gas from the landfill at any time when the gas cannot be treated. Any untreated gas would instead be diverted to the landfill’s flare (in accordance with the landfill’s Title V permit). This is sufficient to satisfy the permittee’s compliance requirements under MACT Subpart AAAA.

d. The visible emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).

e. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

f. The PE limitations are inclusive of and assumed to be PM10.

g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a) [See b)(2)a.].

h. The following term and condition addresses the requirements for replacing emissions units P001, P002 and P003 due to unforeseen circumstances (i.e. catastrophic failure) which result in the existing engine being inoperable:

   i. The replacement engine must be manufactured by Deutz or MWM with a model of TBG 620 V 16 K (Deutz) or TCG 2020 V 16 K (MWM), and have the same emissions factors as the existing engine.

   ii. The replacement engine must not increase the rated capacity, production rate, or throughput of the existing engine.

   iii. The permittee shall notify the Ohio EPA, Northwest District Office when an engine replacement is necessary. This notification may be verbally or in writing and must be within five days of the determination that an engine replacement is necessary due to the inoperative state of the existing engine.

   iv. The permittee shall submit the written notification requested in section e)(5).

   v. The replacement engine must comply with all of the terms and conditions of this permit.

   vi. The Ottawa County Landfill Gas Power Station may install and operate only 3 engines at this facility.

   vii. If the permittee installs an engine that was manufactured after July 1, 2007, this engine will be subject to the requirements of 40 CFR Subpart JJJJ [See d)(2) and e)(4)].

   viii. If the permittee does not operate and maintain a certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, that engine will be considered a non-certified engine [See f)(2)].

   ix. If the permittee installs an engine that was manufactured after July 1, 2007, pursuant to 40 CFR Part 63.6590(c), this engine must meet the requirements of 40 CFR Subpart JJJJ to be in compliance with 40 CFR, Part 63, Subpart ZZZZ. No other requirements under 40 CFR, Part 63, Subpart ZZZZ apply to this emissions unit.

i. The 0.062 lb PE/mmBTU and 3.8 tons PE/yr emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, recordkeeping or reporting requirements to ensure compliance with these emission limitations.

j. The 5.84 lbsNOx/hr, 12.4 lbs CO/hr, 0.20 lb SO2/hr emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit (based on worst-case emissions testing). Therefore, it is not necessary to develop any additional monitoring, recordkeeping or reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) This emissions unit shall burn only landfill gas treated in accordance with section b)(2)c. of this permit.

[OAC rule 3745-77-07(A)(1) and PTI P0104534]

(2) The permittee shall install, calibrate, maintain and operate, according to the manufacturer's specifications, a device at the inlet to the internal combustion engine which completely shuts off gas flow to the internal combustion engine when the internal combustion engine is not operating.

[OAC rule 3745-77-07(A)(1) and PTI P0104534]

(3) When the internal combustion engine is not operating, the landfill gas shall be diverted to the existing flare at the Ottawa County Landfill or to an internal combustion engine that is operating.

[OAC rule 3745-77-07(A)(1) and PTI P0104534]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record each day when a fuel other than treated landfill gas was burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

(2) If applicable, the permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR, Subpart JJJJ, including the following sections

60.4243(a)(1)	certified engine maintenance records
60.4243(a)(1)	non-certified engine maintenance plan and maintenance records
60.4245(a)	documentation and record requirements for certified and non-certified engines

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than treated landfill gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

(2) Any breakdown or malfunction resulting in the emission of raw landfill gas to the atmosphere shall be reported to Ohio EPA, Northwest District Office 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.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

(3) The excursion reports required above are due by the dates described in the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

(4) If applicable, the permittee shall submit notifications and reports for non-certified engines to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Subpart JJJJ, including the following sections:

60.4245(c)	non-certified engine notification
60.4245(d)	due date for stack test reports

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

(5) In the event of unforeseen circumstances (i.e. catastrophic failure) which results in the existing engine being inoperable, the permittee must submit a written statement to the Ohio EPA, Northwest District Office. The statement must be submitted within 30 days of the installation of the replacement engine and shall include the following information:

a. The manufactured date for the replacement engine;

b. The manufacturer, model number and serial number for the replacement engine;

c. The installation and startup dates for the replacement engine; and

d. An affirmation from the permittee, that the replacement engine will be operated in compliance with the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

(6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the" Ohio EPA's eBusiness Center: Air Services" online web portal.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

5.84 lbsNOx/hr; 25.6 tons NOx/yr for each emissions unit P001-P003

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

[NOx emissions testing was conducted on P001 on September 7, 2001. P002 NOx emissions testing was conducted on August 30, 2001. The NOx emissions testing for P003 was conducted on October 6, 2004. These tests demonstrated compliance with the allowable hourly NOx emission limitation.]

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

b. Emission Limitations:

12.4 lbs CO/hr; 54.3 tons CO/yr for each emissions unit P001-P003

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

[CO emissions testing was conducted on P001 on September 7, 2001. P002 CO emissions testing was conducted on August 30, 2001. The CO emissions testing for P003 was conducted on October 6, 2004. These tests demonstrated compliance with the allowable hourly CO emission limitation.]

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/1 ton.

Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

c. Emission Limitations:

0.68 lb NMOC/hr; 3.0 tons NMOC/yr for each emissions unit P001-P003

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

[NMOC emissions testing was conducted on P003 on October 6, 2004. That test demonstrated compliance with the allowable hourly NMOC emission limitation for P001-P003.]

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

d. Emission Limitations:

0.20 lb SO2/hr; 0.9 ton SO2/yr for each emissions unit P001-P003

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 6* of 40 CFR, Part 60, Appendix A.

[SO2 emissions testing was conducted on P003 on October 6, 2004. That test demonstrated compliance with the allowable hourly SO2 emission limitation for P001-P003.]

*In lieu of performance testing, the permittee may sample the sulfur content of the fuel to demonstrate compliance with the allowable mass emission rate.

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

e. Emission Limitations:

26.1 lbs CH4/hr; 114.3 tons CH4/yr for each emissions unit P001-P003

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

[CH4 emissions testing was conducted on P003 on October 6, 2004. That test demonstrated compliance with the allowable hourly CH4 emission limitation for P001-P003.]

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

f. Emission Limitations:

0.062 lb PE/mmBTU actual heat input; 3.8 tons PE/yr for each emissions unit P001-P003

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

[PE emissions testing was conducted on P001 on September 7, 2001. P002 PE emissions testing was conducted on August 30, 2001. The PE emissions testing for P003 was conducted on October 6, 2004. These tests demonstrated compliance with the allowable hourly PE emission limitation.]

The annual limitation was developed by multiply the lb/mmBTU emission limitation by the maximum rated capacity, by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/1 ton. Therefore, provided compliance is shown with the lb/mmBTU emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

g. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

(2) If a non-certified engine is installed at the facility, and the engine was manufactured after July 1, 2007, the permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted within one year of engine startup and conduct subsequent performance testing every 8760 hrs of operation or 3 years, whichever comes first, thereafter to demonstrate compliance.

b. The emission testing shall be conducted to demonstrate compliance with the following limits:

i. The mass emission limitations of 5.84 lbsNOx/hr, 12.4 lbs CO/hr and 0.68 lb NMOC/hr.

c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:

i. Methods 1-4 of 40 CFR, Part 60, Appendix A;

ii. For NOx – Method 7 of 40 CFR, Part 60, Appendix A;

iii. For CO – Method 10 of 40 CFR, Part 60, Appendix A; and

iv. For NMOC – Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. The tests shall be conducted while this emissions unit is operating at its maximum capacity and meet the testing requirements in 40 CFR 60.4244, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Division of Air Pollution Control. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's air agency's refusal to accept the results of the emissions tests.

e. Personnel from the Ohio EPA District Office's air agency shall be permitted to witness the test, 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 unit and/or the performance of the control equipment. A comprehensive written report on the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Division of Air Pollution Control within 60 days following completion of the tests.

[OAC rule 3745-77-07(C)(1) and PTI P0104534]

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[PTI P0104534]