



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

1/2/2013

Michael Crisenbery  
Spring Grove Resource Recovery Inc  
4879 Spring Grove Ave  
Cincinnati, OH 45232

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431072600  
Permit Number: P0111698  
Permit Type: OAC Chapter 3745-31 Modification  
County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
SWOQA; Indiana; Kentucky





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

P001 is a waste material stabilization/solidification process where containers (flex bins) of solids, liquids or sludges are placed into a shredder where they are reduced in size. The shredded material falls into a mix box where it is solidified with an absorbent material. It is then transferred to a container for offsite shipment. Spring Grove Resource Recovery (SGRR) has requested a Chapter 31 modification in order to be able to process materials with higher VOC contents thus increasing emissions. Particulate emissions/PM10 emissions, resulting from the absorbent material will decrease due to a change in the AP42 emission factor used to calculate these emissions.

3. Facility Emissions and Attainment Status:

SGRR is located in Hamilton County which is currently designated nonattainment for ozone. Emissions from the facility consist of VOC and PE/PM10. The facility is currently a synthetic minor facility for HAP's.

4. Source Emissions:

Potential to emit for VOC emissions for the facility prior to Federally-enforceable restrictions are 118.03 TPY. The facility has requested that the annual production rate be limited to 33,280 flex bins shredded per year.

5. Conclusion:

The restrictions in this FEPTIO allow the facility to avoid being a Major Source subject to Title V. This FEPTIO includes rolling, 12-month limits and recordkeeping/reporting sufficient to maintain Synthetic Minor status for VOC emissions.

6. Please provide additional notes or comments as necessary:

Applicable regulations are OAC rule 3745-31-05(A)(3), as effective 11/30/01, OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06, ORC 3704.03(T), OAC rule 3745-31-05(D), OAC rule 3745-17-07(B), OAC rule 3745-17-08. It was determined that there isn't an Area Source MACT category that applies to this emissions unit.

The pound VOC/Batch emission limitation listed under ORC 3704.03(T) was established in accordance with OEPA Guidance Document dated 12/10/2009 (BAT Requirements for Permit Applications Filed On or After August 3, 2009).

Permit Fee: P001    PWR 10,001 – 50,000 pounds per hour Chpt. 31    \$1000



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>35.94</u>
<u>PE/PM10</u>	<u>0.48</u>

PUBLIC NOTICE

1/2/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Spring Grove Resource Recovery Inc

4879 SPRING GROVE AVE.,

Cincinnati, OH 45232

Hamilton County

FACILITY DESC.: Hazardous Waste Treatment and Disposal

PERMIT #: P0111698

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 modification of Solidification Process P001

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Spring Grove Resource Recovery Inc**

Facility ID:	1431072600
Permit Number:	P0111698
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	1/2/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Spring Grove Resource Recovery Inc

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**Draft Permit-to-Install and Operate**

Spring Grove Resource Recovery Inc

**Permit Number:** P0111698

**Facility ID:** 1431072600

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1431072600  
Application Number(s): A0045844  
Permit Number: P0111698  
Permit Description: Chapter 31 modification of Solidification Process P001  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$1,000.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 1/2/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Spring Grove Resource Recovery Inc  
4879 SPRING GROVE AVE.  
Cincinnati, OH 45232

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



**Draft Permit-to-Install and Operate**

Spring Grove Resource Recovery Inc

**Permit Number:** P0111698

**Facility ID:** 1431072600

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0111698

Permit Description: Chapter 31 modification of Solidification Process P001

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Solidification
Superseded Permit Number:	P0098559
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0111698  
**Facility ID:** 1431072600  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Draft Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0111698  
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## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install and Operate**

Spring Grove Resource Recovery Inc

**Permit Number:** P0111698

**Facility ID:** 1431072600

**Effective Date:** To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Draft Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0111698  
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**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P001, Solidification**

**Operations, Property and/or Equipment Description:**

Solidification process

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d., d)(2), e)(2), and f)(1)c.

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	Particulate Emissions (PE) emissions and Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 0.11 pound per hour and 0.48 ton per year.  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(T)	Emissions of volatile organic compounds (VOC) shall not exceed 17.28 pounds per batch of waste materials.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V operating permit requirements for volatile organic compounds(VOC)	Emissions of VOC shall not exceed 35.94 TPY based on a rolling, 12-month summation.  See c)(1).
e.	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust from this emissions unit shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed twenty percent opacity as a three-minute average.
f.	OAC rule 3745-17-08	See c)(2) through c)(5).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 requirement 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

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

The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions (PE) emitted from this emissions unit (PE is emitted in the form of filterable PM10 emissions). 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. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant without an established NAAQS.

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.

c) Operational Restrictions

(1) The maximum annual production rate for the material processed through the shredder of this emissions unit shall not exceed 33,280 flex bins per year, based upon a rolling, 12-month summation of the production rate.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.



- (2) The solidification/stabilization process:
    - a. The solidification/stabilization process shall be located within a 3-sided enclosure in order to minimize or eliminate visible emissions of fugitive dust.
    - b. The maximum annual amount of solidification material used in this emissions unit shall not exceed 12,150 tons.
    - c. Prior to using any solidification material other than sawdust in this emissions unit, the permittee shall notify the Southwest Ohio Air Quality Agency so visible emissions readings can be conducted to determine compliance with the visible particulate emission limitation in term b)(1)e. If compliance is demonstrated with the new material, this Agency will send a letter approving the use of the new material in this emissions unit.
  
  - (3) Front-end loader:
    - a. The scoop/bucket of the front loader shall not exceed 3 cubic yard.
    - b. During the addition of solidification material to the solidification/stabilization process, the drop height of the front-end loader shall not exceed five feet in order to minimize or eliminate visible emissions of fugitive dust.
    - c. The permittee shall employ best available control measures on the handling of the solidification material 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 minimizing the drop height of the front end loader bucket to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
  
  - (4) Storage Area:
    - a. The solidification material in the storage area shall be covered during times when the emissions unit is not in operation.
    - b. The height of the solidification material in the storage area shall not exceed eight feet.
  
  - (5) 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 minimizing the height of the storage piles to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following daily records:
    - a. the number of batches processed;



- b. the amount, in pounds, of VOC containing material per flex bin;
  - c. the number of flex bins processed per batch; and
  - d. the pounds of VOC emitted per batch processed.
- (2) The permittee shall maintain monthly records of the following information:
- a. the total number of flex bins shredded for each month;
  - b. the rolling, 12-month summation of the production rate.
  - c. the total VOC emissions from this emissions unit, in tons of VOC per month; and
  - d. the rolling, 12-month summation of the VOC emission rates.
- (3) 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 a permittee to apply for and obtain a new or modified PTIO 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 PTIO.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the 17.3 pounds of VOC per batch of waste material Applicable Emission Limitation;
    - ii. all exceedances of the rolling, 12-month VOC Applicable Emission Limitation; and
    - iii. all exceedances of the rolling, 12-month restriction on the amount of material shredded in this emissions unit.



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

- (3) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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:

PE and PM10 emissions shall not exceed 0.11lb/hr and 0.48 ton/yr (TPY).

Applicable Compliance Method:

The hourly and annual emission limitations shall be determined using the following methodology:

Compliance with the PE/PM10 emission limitations shall be determined using the emission factor calculated using Predictive Emission Factor Equation 13.2.4.3 found in AP-42 Ch. 13.2.4 Aggregate Handling and Storage Piles. The Predictive Emission Factor Equation is used as follows:

$$E = k(0.0032) \left( \frac{U}{5} \right)^{1.3} \left( \frac{M}{2} \right)^{1.4} \text{pound per ton}$$

where:

E = emission factor (0.08 pound per ton as calculated using the above formula from AP42 Chapter 13.2.4.3, Predictive Emission Factor Equation)

k = particle size multiplier (0.74 from AP42 Chapter 13.2.4.3)

U = mean wind speed (15 mph from AP 42 chapter 13.2.4.3)

M = material moisture content (0.46% from AP42 Table 13.2.4-1)



The hourly emissions are determined by multiplying 0.08 pound/ton by the 1.38 tons per hour material handling rate.

The annual particulate emissions (PE) are determined by multiplying 0.08 pound/ton by the total tons of material unloaded/handled during the previous calendar year then dividing by 2000 pounds. PM10 is assumed equivalent to the PE.

b. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 17.28 pounds per batch of waste materials.

Applicable Compliance Method:

The VOC emission limitation was determined by multiplying the facility provided emission factor of 2.16 lbs. of VOC/flex-bin by 8 flex-bins processed/batch = 17.28 pounds of VOC per batch of waste materials.

c. Emission Limitation:

Emissions of VOC shall not exceed 35.94 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual emission limitation was determined by multiplying 2.16 lbs. of VOC/flex bin by 8 flex-bins processed/batch then by a batch time of one hour then multiplying by 4160 hours per year and dividing by 2000 pounds = 35.94 TPY of VOC.

d. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with US EPA Method 9.

g) Miscellaneous Requirements

(1) None.