



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
SENECA COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-17081**

**Fac ID: 0374010199**

**DATE: 12/21/2006**

Sunny Farms Landfill  
Dennis Pantano  
12386 Township Road 108  
Fostoria, OH 44830

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NWDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 12/21/2006  
Effective Date: 12/21/2006**

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**FINAL PERMIT TO INSTALL 03-17081**

Application Number: 03-17081  
Facility ID: 0374010199  
Permit Fee: **\$400**  
Name of Facility: Sunny Farms Landfill  
Person to Contact: Dennis Pantano  
Address: 12386 Township Road 108  
Fostoria, OH 44830

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**12500 West Seneca County Road 18  
Fostoria, Ohio**

Description of proposed emissions unit(s):  
**Modification to landfill permit as a result of C+DD rail receipts.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Sunny Farms Landfill  
PTI Application: 03-17081  
Issued: 12/21/2006

Facility ID: 0374010199

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **2. Scheduled Maintenance/Malfunction Reporting**

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

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

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

#### **4. Title IV Provisions**

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

#### **5. Severability Clause**

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

#### **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- 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, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying 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.

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

#### **10. Permit-To-Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

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

#### **12. Air Pollution Nuisance**

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

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.

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

### **3. Permit Transfers**

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

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

of any transfer of this permit.

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

**4. Authorization To Install or Modify**

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

**5. Construction of New Sources(s)**

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

**6. Public Disclosure**

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

**7. Applicability**

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

**8. Construction Compliance Certification**

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

**C. Permit-To-Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Fugitive PE	38.21
Fugitive PM <sub>10</sub>	5.24
Fugitive NMOC	54.9
Fugitive Methane	36,820
CO	15.0

**Sunny Farms Landfill**  
**PTI Application: 03-17081**  
**Issued: 12/21/2006**

**Facility ID: 0374010199**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

None

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

None

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (F001) - Asbestos, municipal solid waste (MSW) and construction and demolition debris (C&DD) landfill operations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	54.9 tons/year (50.0 megagrams) of fugitive nonmethane organic compounds (NMOC)  36,820 tons/year of fugitive methane  38.21 tons/year of fugitive particulate emissions (PE)  5.24 tons/year of fugitive particulate matter of 10 microns or less (PM <sub>10</sub> )  15.0 tons/yr of carbon monoxide (CO)  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.I.2.c through A.I.2.e)  Visible fugitive PE shall not exceed 20% opacity as a 3-minute average  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart WWW
OAC rule 3745-17-07(B)	see A.I.2.a
OAC rule 3745-17-08(B)	see A.I.2.b
40 CFR Part 60, Subpart WWW	see A.IV.1. through A.IV.6. and A.V.1. through A.V.4.
40 CFR Part 61, Subpart M	see A.I.2.h. to A.I.2.n

**2. Additional Terms and Conditions**

Emissions Unit ID: F001

- 2.a** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.b** This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.c** The landfill fugitive dust operations/sources that are covered by this permit and subject to the requirements of OAC rule 3745-31-05(A)(3) are listed below:
- MSW/C&DD landfill operations:  
daily cover and handling and placement  
solid waste handling (dumping)  
spreading, grading and compaction  
truck loading and unloading  
bulldozing  
storage pile activities (loading, unloading and wind erosion)
- 2.d** The permittee shall employ best available control measures for the above landfill fugitive dust operations/sources 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 the minimization of drop heights where applicable and watering at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the fugitive dust operation/sources until further observation confirms that use of the control measure(s) is unnecessary.
- 2.f** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 2.g** The asbestos, MSW/C&DD landfill has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters. As a result, the permittee shall calculate a NMOC emission rate using the procedures specified in Section A.V.1. The NMOC emission rate shall be recalculated annually, except as provided in Section A.IV.3.

Emissions Unit ID: F001

- 2.h** The permittee shall inspect each load of asbestos-containing material (ACM) delivered to the facility. The inspection shall consist of a visual examination to ensure that each shipment of ACM is received in intact, leak-tight containers labeled with appropriate hazard warning labels, the name of the waste generator, and the location of waste generation. The inspection also shall determine whether the waste shipment records accompany the consignment and accurately describe the waste material and quantity.

If on the basis of the inspection, the waste material is found to be improperly received, the load shall be disposed of in accordance with the procedures in the "Asbestos Spill Contingency Plan," and the discrepancy shall be noted on the waste shipment record.

- 2.i** The permittee shall implement and maintain an "Asbestos Disposal Operating Procedure and Spill Contingency Plan" ("Plan") consisting of: authorized personnel training, inspection and disposal operating procedures, non-conforming load response procedures, inventory and maintenance procedures for safety and emissions control equipment, record keeping procedures, and emergency notification procedures. Authorized personnel shall be knowledgeable in the procedures, and the Plan shall be available for inspection at this facility at all times.
- 2.j** There shall be no visible emissions from asbestos-containing materials (ACM) during on-site transportation, transfer, unloading, deposition or compacting operations.
- 2.k** Deposition and burial operations shall be conducted in a careful manner which prevents handling by equipment or persons that causes ACM to be broken up or dispersed before the materials are buried.
- 2.l** The permittee shall cover and compact asbestos wastes in accordance with the following:
- i. As soon as practicable after the placement of friable asbestos, but no later than the end of each working day, the ACM deposited at the site during the operating day shall be covered with at least 12 inches of non-ACM. Once the ACM are covered, the area may be compacted.
  - ii. Care shall be taken to ensure that disposed asbestos shall not be re-excavated in subsequent operations. Any accidentally exposed material shall be immediately recovered in accordance with the provisions of (l.) above.
  - iii. ACM shall be separated from the landfill final grade by no less than 24 inches of compacted non-ACM and a permanent cover of vegetation, or in

Emissions Unit ID: F001

accordance with current requirements for closure, whichever is more stringent.

- 2.m** Emissions control equipment shall be available for wetting and containing asbestos in the event of a release or non-conforming load disposal. All equipment required to implement the Asbestos Spill Contingency Plan shall be maintained in accordance with good engineering practices to ensure that the equipment is in a ready-to-use condition and in an appropriate location for use.
- 2.n** The permittee shall establish restricted access, adequate to deter the unauthorized entry of the general public and any unauthorized personnel, within 100 feet of the unloading, deposition, and burial areas of the asbestos-containing waste material. A hazard warning shall display the following information on signs not less than 20 x 14 inches in size, posted so they are visible before entering an area with asbestos waste disposal operations in progress:

"ASBESTOS WASTE DISPOSAL SITE  
DO NOT CREATE DUST  
BREATHING ASBESTOS IS HAZARDOUS TO YOUR HEALTH"

The letter sizes and styles shall be of a visibility at least equal to the following specifications: one inch sans serif, gothic or block in the first and second line; and at least three-fourths inches sans serif, gothic or block in the third line; and fourteen point gothic in the fourth line. Spacing between any two lines must be at least equal to the height of the upper of the two lines.

- 2.o** There shall be no open burning in violation of Ohio Administrative code 3745-19 at this facility.
- 2.p** Hydrogen Sulfide Emissions Contingency Plan

As part of the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), Ohio EPA may request the permittee to develop and implement a hydrogen sulfide emissions contingency plan. If requested, the contingency plan shall meet the requirements detailed in rules developed in response to House Bill (H.B.) 397.

Under H.B. 397 signed by the governor December 22, 2005, Ohio EPA is required to develop rules governing the operation of construction and demolition debris (C&DD) landfills. One part of this bill requires Ohio EPA to require C&DD facilities to develop and implement a contingency plan for the effective action in response to hydrogen sulfide or other gas emissions. However, Ohio EPA believes it may become important for facilities other than C&DD landfills to have in place a contingency plan to deal with potential hazardous emissions. Therefore, as a condition of this permit, if requested, the permittee will be

**Sunny Farms Landfill**

**DTI Application: 02 17084**

**Facility ID: 0374010199**

Emissions Unit ID: F001

required to develop and implement a hydrogen sulfide / other gas emission contingency plan consistent with the requirements developed in response to H.B. 397.

Issued: 12/21/2006

## II. Operational Restrictions

1. The permittee shall be limited to accepting no more than 3,000 tons of MSW per day. The permittee is also limited to accepting no more than 2,000 tons of C&DD material (as defined in Ohio Revised Code 3714.01 (C)) per day.

## III. Monitoring and/or Record keeping Requirements

1. The permittee shall keep for at least 5 years up-to-date, readily accessible, on-site records of the maximum design capacity, the current amount of solid waste in place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they retrievable within 4 hours. Either paper or electronic formats are acceptable.
2. Except as otherwise provided in this section, the permittee shall perform inspections of the landfill fugitive dust operations/sources in accordance with the following frequencies:

<u>Landfill fugitive dust operations/sources</u>	<u>minimum inspection frequency</u>
daily cover and handling and placement operation	once during each day of
solid waste handling (dumping) operation	once during each day of
spreading, grading and compaction operation	once during each day of
truck loading and unloading operation	once during each day of
bulldozing operation	once during each day of
storage pile activities (loading, unloading, & wind erosion) operation	once during each day of

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

**Issued: 12/21/2006**

4. The permittee may, upon receipt of written approval from the Northwest District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
5. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
  - c. the dates the control measure(s) was (were) implemented; and
  - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in Section A.III.5.d shall be kept separately for each landfill fugitive dust operation/source identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

6. The permittee shall maintain daily records of the following information:
  - a. The amount of MSW material accepted by the landfill, in tons per day.
  - b. The total annual, year to date, amount of MSW material accepted by the landfill, in tons per year (sum of a. for each calendar day to date from January to December).
  - c. The amount of C&DD material accepted by the landfill as defined in Ohio Revised Code 3714.01 (C), in tons per day.
  - d. The total annual, year to date, amount of C&DD material accepted by the landfill as defined in Ohio Revised Code 3714.01 (C), in tons per year (sum of c. for each calendar day to date from January to December).

**IV. Reporting Requirements**

1. The permittee shall submit an annual NMOC emission rate report to the Director, except as provided for in Section A.IV.3. The Director may request such additional information as may be necessary to verify the reported NMOC emission rate.

Emissions Unit ID: F001

2. The NMOC emission rate report shall contain an annual or 5-year estimate of the NMOC emission rate calculated using the formulas and procedures provided in Section A.V.1.
3. If the estimated NMOC emission rate as reported in the annual report is less than 50 megagrams per year in each of the next 5 consecutive years, the permittee may elect to submit an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual report, as per 40 CFR Part 60.757 (b)(1)(ii). This estimate shall include the current amount of solid waste in place and the estimated waste acceptance rate for each year of the 5 years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based shall be provided to the Northwest District Office. This estimate shall be revised at least once every 5 years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the 5-year estimate, a revised 5-year estimate shall be submitted to the Northwest District Office. The revised estimate shall cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate.
4. The NMOC emission rate report shall include all the data, calculations, sample reports, and measurements used to estimate the annual or 5-year emissions.

**Issued: 12/21/2006**

5. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency;
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented;
  - c. any day where more than 3,000 tons per day of MSW material was accepted; and/or
  - d. any day where more than 2,000 tons per day of C&DD material was accepted.

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

**V. Testing Requirements**

1. The permittee shall calculate the NMOC emission rate using either the equation provided in Section A.V.1.a or the equation provided in Section A.V.1.b. Both equations may be used if the actual year-to-year solid waste acceptance rate is known, as specified in Section A.V.1.a, for part of the life of the landfill. The values to be used in both equations are 0.05 per year for  $k$ , 170 cubic meters per megagram for  $L_0$ , and the average  $C_{NMOC}$  from collected samples as determined by the procedures specified in Section A.V.2. For landfills located in geographical areas with a thirty year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the  $k$  value to be used is 0.02 per year.
  - a. The following equation shall be used if the actual year-to-year solid waste acceptance rate is known:

$$M_{NMOC} = \sum_{i=1}^n 2k L_0 M_i (e^{-k t_i}) C_{NMOC} (3.6 \times 10^{-9})$$

Where:

$M_{NMOC}$  = Total NMOC emission rate from the landfill, megagrams per year  
 $k$  = methane generation rate constant, year<sup>-1</sup>

Issued: 12/21/2006

$L_o$  = methane generation potential, cubic meters per megagram solid waste  
 $M_i$  = mass of solid waste in the  $i^{\text{th}}$  section, megagrams  
 $t_i$  = age of the  $i^{\text{th}}$  section, years  
 $C_{\text{NMOC}}$  = concentration of NMOC, parts per million by volume as hexane  
 $3.6 \times 10^{-9}$  = conversion factor

The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value for  $M_i$  if documentation of the nature and amount of such wastes is maintained.

- b. The following equation shall be used if the actual year-to-year solid waste acceptance rate is unknown:

$$M_{\text{NMOC}} = 2L_oR(e^{-kc} - e^{-kt})C_{\text{NMOC}}(3.6 \times 10^{-9})$$

Where:

$M_{\text{NMOC}}$  = mass emission rate of NMOC, megagrams per year  
 $L_o$  = methane generation potential, cubic meters per megagram solid waste  
 $R$  = average annual acceptance rate, megagrams per year  
 $k$  = methane generation rate constant,  $\text{year}^{-1}$   
 $t$  = age of landfill, years  
 $C_{\text{NMOC}}$  = concentration of NMOC, parts per million by volume as hexane  
 $c$  = time since closure, years; for active landfill  $c=0$  and  $e^{-kc}=1$   
 $3.6 \times 10^{-9}$  = conversion factor

The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value of  $R$ , if documentation of the nature and amount of such wastes is maintained.

2. The permittee shall determine the NMOC concentration using the following sampling procedure. The permittee shall install at least two sample probes per hectare of landfill surface that has retained waste for at least 2 years. If the landfill is larger than 25 hectares in area, only 50 sample probes are required. The sample probes should be located to avoid known areas of nondegradable solid waste. The owner or operator shall collect and analyze one sample of landfill gas from each probe to determine the NMOC concentration using Method 25 or 25C of Appendix A of 40 CFR Part 60. Method 18 of Appendix A of 40 CFR Part 60 may be used to analyze the samples collected by the Method 25 or 25C sampling procedure. Taking composite samples from different probes into a single cylinder is allowed; however, equal sample volumes must be taken from each probe. For each composite, the sampling rate, collection

Emissions Unit ID: F001

times, beginning and ending cylinder vacuums, or alternative volume measurements must be recorded to verify that composite volumes are equal. Composite sample volumes should not be less than one liter unless evidence can be provided to substantiate the accuracy of smaller volumes. Terminate compositing before the cylinder approaches ambient pressure where measurement accuracy diminishes. If using Method 18, the permittee must identify all compounds in the sample and, as a minimum, test for those compounds published in the most recent Compilation of Air Pollutant Emission Factors (AP-42), minus carbon monoxide, hydrogen sulfide, and mercury. As a minimum, the instrument must be calibrated for each of the compounds on the list. Convert the concentration of each Method 18 compound to  $C_{\text{NMOC}}$  as hexane by multiplying by the ratio of its carbon atoms divided by six. The permittee must divide the NMOC concentration from Method 25 of 25 C of Appendix A of 40 CR Part 60 by six to convert from  $C_{\text{NMOC}}$  as carbon to  $C_{\text{NMOC}}$  as hexane. If the landfill has an active or passive gas removal system in place, Method 25 or 25C samples may be collected from these systems instead of surface probes provided the removal system can be shown to provide

**Issued: 12/21/2006**

sampling as representative as the two sampling probe hectare requirement. For active collection systems, samples may be collected from the common header pipe before the gas moving or condensate removal equipment. For these systems, a minimum of three samples must be collected from the header pipe.

The permittee shall retest the site-specific NMOC concentration every 5 years using the methods specified above.

3. If the resulting mass emission rate calculated using the site-specific NMOC concentration is equal to or greater than 50 megagrams per year, then the permittee shall either:

a. determine the site-specific methane generation rate constant and recalculate the NMOC emission rate using the site-specific methane generation rate. The site-specific methane generation rate constant shall be determined using the procedures provided in Method 2E of appendix A in 40 CFR Part 60.

OR

b. submit a collection and control system design plan prepared by a professional engineer to the Northwest District Office within one year in accordance with 40 CFR 60.752(b)(2); AND

c. install a collection and control system that captures the gas generated within the landfill, as required by 40 CFR 60.752 (b)(2)(ii)(A) or (B) and (b)(2)(iii) within 30 months after the first annual report in which the emission rate equals or exceeds 50 megagrams per year; AND

d. submit a Permit to Install (PTI) application for a modification of the MSW landfill to address new source review issues associated with the installation of the collection and control system.

4. If the resulting mass emission rate calculated using the site-specific methane generation rate and concentration of NMOC is equal to or greater than 50 megagrams per year, the permittee shall comply with the requirements of Sections A.V.3.b, A.V.3.c, and A.V.3.d.

5. Compliance with the emissions limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation: 54.9 tons of fugitive NMOC/year

**Sunny Farms Landfill**

DTI Application: 02-17084

**Facility ID: 0374010199**

Emissions Unit ID: F001

Applicable Compliance Method: The permittee shall demonstrate compliance with the above emission limitation through the annual NMOC emission rate report required in Section A.IV.1.

- b. Emission Limitation: 36,820 tons/year of fugitive methane

**Issued: 12/21/2006**

Applicable Compliance Method: The permittee shall demonstrate compliance through calculations using the equations in AP-42, Section 2.4, equation #1 and #4 (dated 11/98) and the Landfill Gas Emissions Model (LandGEM) with a total landfill capacity of 9,611,000 tons of compacted waste.

- c. Emission Limitation: 15.0 tons/year of CO

Applicable Compliance Method: The permittee shall demonstrate compliance through calculations using the equations in AP-42, Section 2.4, equation #1 and #4 (dated 11/98) and the Landfill Gas Emissions Model (LandGEM) with a total landfill capacity of 9,611,000 tons of compacted waste.

- d. Emission Limitation: 38.21 tons/year of fugitive PE and 5.24 tons/year of fugitive PM<sub>10</sub>

Applicable Compliance Method: Compliance with fugitive PE and PM<sub>10</sub> limitations shall be determined by calculations using the information in the table below.

<b>Activity</b>	<b>PE Emission Factor (PM<sub>10</sub> scaling/ratio factor)</b>	<b>Source of Emission Factor or Equation</b>	<b>Annual Basis</b>	<b>Total Emissions (tons/year)</b>
Truck Loading - Landfill Soil Cover	0.0005 lb/ton 0.0002 lb/ton	AP-42, Section 13.2.4 (1/95)	100,000 tons	PE - 0.03 PM <sub>10</sub> - 0.01
Truck Unloading Landfill Soil Cover	0.0005 lb/ton 0.0002 lb/ton	AP-42, Section 13.2.4 (1/95)	100,000 tons	PE - 0.03 PM <sub>10</sub> - 0.01
Truck Loading - Construction	0.0008 lb/ton 0.0004 lb/ton	AP-42, Section 13.2.4 (1/95)	301,650 tons	PE - 0.12 PM <sub>10</sub> - 0.05
Truck Unloading - Construction	0.0008 lb/ton 0.0004 lb/ton	AP-42, Section 13.2.4 (1/95)	301,650 tons	PE - 0.12 PM <sub>10</sub> - 0.05
Waste Dumping	0.0005 lb/ton 0.0002 lb/ton	AP-42, Section 13.2.4 (1/95)	1,825,000 tons	PE - 0.47 PM <sub>10</sub> - 0.22
Bulldozer - Daily Cover	2.1087 lb/dozer hr 0.2775 lb/dozer hr	AP-42, Section 11.9-1 (7/98)	1,460 hours	PE - 1.54 PM <sub>10</sub> - 0.20
Bulldozer - Construction	2.1087 lb/dozer hr 0.2775 lb/dozer hr	AP-42, Section 11.9-1 (7/98)	2,280 hours	PE - 3.05 PM <sub>10</sub> - 0.40

Issued: 12/21/2006

Soil Removal Scraper - Construction	0.0580 lb/ton 0.0075 lb/ton	AP-42, Section 11.9-4 (7/98)	188,400 tons	PE - 5.46 PM <sub>10</sub> - 0.71
Soil Removal Scraper - Landfill	0.0580 lb/ton 0.0075 lb/ton	AP-42, Section 11.9-4 (7/98)	12,000 tons	PE - 0.35 PM <sub>10</sub> - 0.05
Bulldozer - Waste Spreading	1.8388 lb/dozer hr 0.2419 lb/dozer hr	AP-42, Section 11.9-1 (7/98)	8,760 hours	PE - 8.05 PM <sub>10</sub> - 1.06
Wind Erosion - Construction	0.3800 ton/acre/yr 0.0494 ton/acre/yr	AP-42, Section 11.9-4 (7/98)	40 acres	PE - 15.20 PM <sub>10</sub> - 1.98
Wind Erosion - Landfill	0.3800 ton/acre/yr 0.0494 ton/acre/yr	AP-42, Section 11.9-4 (7/98)	10 acres	PE - 3.80 PM <sub>10</sub> - 0.49

- e. Emission Limitation: Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method: If required, compliance with the visible emission limitation for the landfill fugitive dust operations/sources identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

## VI. Miscellaneous Requirements

1. This permit supercedes all terms and conditions listed in PTI #03-13839 issued final on January 14, 2003.

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (F001) - Asbestos, municipal solid waste (MSW) and construction and demolition debris (C&DD) landfill operations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-20-05	See B.I.2.a.
OAC rule 3745-20-06	See B.I.2.a.
OAC rule 3745-20-07	See B.I.2.a.

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05 (A)(3) contained in the State and Federally Enforceable Section of Part III for this emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None