



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
LUCAS COUNTY
Application No: 04-00812

DATE: 10/30/2001

Envirosafe Services of Ohio
Kenneth Humphrey
876 Otter Road
Oregon, OH 43616

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Very truly yours,

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

CC: USEPA

TDES



**Permit To Install
Terms and Conditions**

**Issue Date: 10/30/2001
Effective Date: 10/30/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 04-00812

Application Number: **04-00812**
APS Premise Number: **0448020066**
Permit Fee: **\$500**
Name of Facility: **Envirosafe Services of Ohio Humphrey**
Person to Contact: **Kenneth Humphrey**
Address: **876 Otter Road
Oregon, OH 43616**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**876 Otter Road
Oregon, OHIO**

Description of modification:
waste stabilization complex.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Envirosafe Services of Ohio
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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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).

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

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Envirosafe Services of Ohio** located in **LUCAS** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

	F003			Campaign Sort/Stabilization area
		T002	<u>Source Identification Description</u>	
P901	F004		Truck Unloading Station No. 1	Mixing Station
		T003		
	F004 Cont'd			Cement Unloading
P902	F005		Truck Unloading Station No. 2	
		T004		
				Weight Scales
P903	F006		Sort Floor	
				Cement Storage Silos
	F007			
P905			Container Storage building	Leachate Storage Tank No. 1
	T001			

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Leachate Storage Tank No. 2	BAT Determination	of Carbon Filter Use of Water spray to Control PM Emissions and Good house-keeping Practices	Submerged fill and vent to Carbon Filter	Applicable Federal & OAC Rules
Leachate Storage Tank No. 3	Control of PM With a Fabric Filter and Control of Organic Emissions by use of Carbon Filter	Use of Water spray to Control PM Emissions and Good house-keeping Practices	Submerged fill and vent to Carbon Filter	3745-31-05 3745-17-07 (A), (B) 3745-17-08 3745-21-07 (B)
Leachate Storage Tank No. 4	Control of PM With a Fabric Filter and Control of Organic Emissions by use of Carbon Filter	Pneumatic Transfer with PM control by Silo Baghouse		3745-31-05 3745-17-07 (A), (B) 3745-17-08 3745-21-07 (B)
	Control of PM With a Fabric Filter and Control of Organic Emissions by use of Carbon Filter	Use of Water spray to Control PM Emissions and Good house-keeping Practices		3745-31-05 3745-17-07 (A), (B) 3745-17-08 3745-21-07 (B)
	Control of PM With a Fabric Filter and Control of Organic Emissions by use of Carbon Filter	Silos Vented to Fabric Filters		3745-31-05 3745-17-07 (A), (B) 3745-17-08 3745-21-07 (B)
	Control of PM With a Fabric Filter and Control of Organic Emissions by use of Carbon Filter	Submerged fill and vent to Carbon Filter		3745-31-05 3745-17-07 (A), (B) 3745-17-08
	Control of PM With a Fabric Filter and Control of Organic Emissions by use of Carbon Filter	Submerged fill and vent to Carbon Filter		3745-17-08

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-31-05	(L) NSPS Subpart K _B			
3745-17-07	3745-31-05	Permit Allowable Mass Emissions and/or Control/Usage Requirements	0.14 lb/hr PM; 0% Opacity	
(A), (B)	3745-21-09			
3745-17-08	(L) NSPS Subpart K _B			
3745-31-05	3745-31-05	0.73 x 10 ⁻³ lb/hr PM, 0% Opacity From Stack.		Minimize or Eliminate Visible Emissions
3745-17-07	(L) NSPS Subpart K _B			
(A), (B)				
3745-17-08	3745-31-05	0.73 x 10 ⁻³ lb/hr PM, 0% Opacity From Stack.		Minimize or Eliminate Visible Emissions
	3745-21-09			
	(L) NSPS Subpart K _B			
3745-31-05		1.5 x 10 ⁻³ lb/hr PM, ; 0% Opacity From Stack.		
3745-17-07				
(A), (B)				
3745-17-08		0.20 x 10 ⁻³ lb/hr PM, 0% Opacity From Stack.	4 x 10 ⁻³ tons/yr VOC	
3745-31-05			4 x 10 ⁻³ tons/yr VOC	
3745-17-07				
(A), (B)		Minimize or Eliminate Visible Emissions		
3745-17-08			4 x 10 ⁻³ tons/yr VOC	
3745-31-05		Minimize or Eliminate Visible Emissions		
3745-21-09			4 x 10 ⁻³ tons/yr VOC	

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**SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
PM	0.12
VOC (From Tanks)	16 x 10 ⁻³

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T001	25,000 Gal Leachate Storage Tank	KB
T002	25,000 Gal Leachate Storage Tank	KB
T003	25,000 Gal Leachate Storage Tank	KB
T004	25,000 Gal Leachate Storage Tank	KB

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The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
 DAPC - Air Quality Modeling and Planning
 P.O. Box 1049
 Columbus, OH 43216-1049

and Environmental Services

348 South Erie Street
 Toledo, Ohio 43602

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **TDES**.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

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This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

MISCELLANEOUS STORAGE TANKS

Unless otherwise indicated, BAT for any miscellaneous storage tanks identified within this permit consists of the use of submerged fill into the storage tanks. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

Source Number(s)

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	<u>Tank Size</u>
T001	
T002	
T003	25,000
T004	25,000
	25,000
	25,000

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. CONTROL/MONITORING REQUIREMENTS

- A. Truck Unloading Station Nos. 1 and 2, the Sort Floor, and Container Unloading station shall be controlled by venting to a baghouse followed by a carbon filter.
- B. Particulate matter emissions from the campaign bin and mixing area shall be controlled by water spray.
- C. General building ventilation for the waste stabilization building and container storage building shall each be equipped with a baghouse.
- D. Each baghouse required by this permit to install shall be equipped with a device to continuously measure the pressure drop across each baghouse and be equipped with an alarm that will sound when a broken bag is detected.
- E. Good housekeeping practices shall be employed throughout the waste stabilization building and container processing building. The floors shall be cleaned at least once daily to minimize fugitive dust emissions.
- F. There shall be no visible emissions from the stacks serving P901, P902, P903, P904, P905, P906 and the general building ventilation stacks of the waste stabilization building and container storage building. Sources F003 and F004 shall be operated in such a manner as to minimize or eliminate visible particulate emissions. Visible emissions from stacks serving P901, P902, P903, P905 and

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P906 shall be determined using the procedures specified in 40 CFR part 60, Appendix A, Method 22.

- G. Cement shall be transferred pneumatically to storage. The pneumatic system shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust. Any visible emissions of cement emanation from the delivery vehicle shall be cause for the immediate halt of the unloading process and the refusal of the cement load until the situation is corrected. The cement silo vent shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient so as to minimize at all times visible emissions of fugitive dust at the points of capture. There shall be no visible emissions from the fabric filter outlet.

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Visible emissions from the fabric filter outlet shall be determined using the procedures specified in 400 CFR part 60, Appendix A, Method 9. Visible emissions from the delivery vehicle shall be determined by the procedures specified in 40 CFR part 60, Appendix A, Method 22.

- H. The storage tanks (T001-T004) listed in this Permit to Install shall be equipped with carbon filters to control emissions of organic compounds.
- I. The concentration level of organic compounds in the exhaust vent stream from each carbon filter required by this Permit to Install shall be monitored on a regular schedule, and the existing carbon shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. The device shall be monitored on a daily basis or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater. As an alternative to conducting this monitoring, an owner or operator may replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval that is determined by the maximum design flow rate and organic concentration in the gas stream vented to the carbon adsorption system.

Pressure gauges shall be installed on the inlet and outlet of all carbon absorbers. Pressure gauges shall be checked weekly for clogging. Records shall be maintained of all pressure readings performed.

- J. The owner or operator shall implement a preventative maintenance program for all fabric filters. At a minimum, the program shall include the inspection schedule as outlined in Ohio EPA's Operation and Maintenance Guidelines for Air Pollution Control Equipment.

2. Recordkeeping

- A. The owner or operator shall maintain records of all inspections and maintenance performed on control equipment require by this permit to install.
- B. The owner or operator shall maintain the 365 day rolling total of waste processed in units of tons/day.
- C. All records required by this permit to install shall be maintained on site for a minimum of two years and be made available to representatives of the Toledo Division of Pollution Control and Ohio EPA during normal operating hours.