



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
TRUMBULL COUNTY
Application No: 02-17877**

CERTIFIED MAIL

DATE: 10/16/2003

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Warren Recycling, Inc.
Anthony DiCenso
PO Box 3647 300 Martin Luther King Blvd
Warren, OH 44485

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA NEDO Eastgate Development & Transportation Study WV PA

TRUMBULL COUNTY

**PUBLIC NOTICE
OHIO ENVIRONMENTAL PROTECTION AGENCY
ISSUANCE OF DRAFT PERMIT TO INSTALL
TO WARREN RECYCLING, INC.**

Public notice is hereby given that the Ohio Environmental Protection Agency (EPA) has issued, on **(October 16, 2003)**, a draft action of Permit to Install (PTI) Application Number **02-17877** to Warren Recycling, Inc., Warren, Ohio. This draft permit proposes to allow the modification of an existing Construction and Demolition Debris Landfill. The modification will result in an increase of particulate emissions. The proposed allowable criteria pollutant air emission rates which result from net increases at the facility are listed below, in tons per year.

<u>Pollutant</u>	<u>Tons/yr</u>
Particulate Matter	72.7

A public hearing on the draft air permit is scheduled for 7:00 p.m., Thursday, October 20, 2003, at Johnson Community Center, 800 Gillmer Road, Levittsburg, Ohio 44430. A presiding officer will be present and may limit oral testimony to ensure that all parties are heard.

All interested persons are entitled to attend or be represented and give written or oral comments on the draft permit at the hearing. Written comments must be received by Ohio EPA at the close of the business day on October 24, 2003. Comments received after this date will not be considered to be a part of the official record. Written comments may be submitted at the hearing or sent to: Joseph Loucek, Ohio EPA Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Copies of the draft permit application and technical support information may be reviewed and/or copies made by first calling to make an appointment at the Ohio EPA Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087, telephone 330-963-1200.



Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 02-17877

Application Number: 02-17877

APS Premise Number: 0278080712

Permit Fee: **To be entered upon final issuance**

Name of Facility: Warren Recycling, Inc.

Person to Contact: Anthony DiCenso

Address: PO Box 3647 300 Martin Luther King Blvd
Warren, OH 44485

Location of proposed air contaminant source(s) [emissions unit(s)]:

300 Martin Luther King Blvd.

Warren, Ohio

Description of proposed emissions unit(s):

Roadways and parking areas, material handling, landfill operations.

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

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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.

4. Inspections and Information Requests

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

permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance

that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

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

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. 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.

15. Fees

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

B. 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>
PE	72.7

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Facility Unpaved Roadways and Parking Areas	OAC rule 3745-31-05(A)(3)	There shall be no visible particulate emissions from any unpaved roadway or unpaved parking area except for a period of time not to exceed three minutes during any sixty-minute observation period. The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g).
	OAC rule 3745-17-07(B)(5)	Particulate emissions shall not exceed 45.1 tons per year. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	The control measures specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a All unpaved roadways and parking areas at the facility are covered by this permit and subject to the above-mentioned requirements.
- 2.b The permittee shall employ best available control measures on all unpaved roadways and parking areas 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 treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance and posting and maintaining a maximum vehicle speed of 10 miles per hour (MPH). Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled by flushing. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to a visible emission limitation of no visible particulate emissions except for one minute during any sixty-minute observation period.
- 2.e The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.f Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.g 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 rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

1. Used oil as defined by OAC rule 3745-279-01(A)(12) shall not be used as a dust suppressant.
2. The permittee shall have posted speed limit signs identifying 10 miles per hour as the maximum on-site speed limit.
3. The permittee shall implement the control measures specified by the most recent version of the Dust Control Plan as accepted by Ohio EPA, Northeast District Office.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of all unpaved roadways and parking areas on a daily basis.
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall record any time and reason that a control measure specified in the most recent version of the Dust Control Plan accepted by Ohio EPA, Northeast District Office, was not implemented.

D. Reporting Requirements

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

- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation;
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented; and
 - c. each time a control measure specified in the most recent version of the Dust Control Plan accepted Ohio EPA, Northeast District Office, is not followed.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. Visible Emission Limitation:

No visible emissions except for three minutes during any sixty-minute period.

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

- 2. Emission Limitation:

Particulate emissions shall not exceed 45.1 TPY.

Applicable Compliance Method:

Compliance shall be based on a one-time calculation based on the most recent revisions to AP-42 Chapter 13.2.2 (currently September 1998). The calculation is as follows, and is equivalent to the emissions unit's annual potential to emit:

$$E = k * (s/12)^a * (W/3)^b / (M/0.2)^c * [(365-p)/365] * (Spd/15) * VMT * (1 \text{ lbs}/2,000 \text{ tons}) * (1-CE)$$

where:

- E = annual particulate emission rate (tons);
- k = constant, 10 for TSP, from Table 13.2.2-2;
- s = surface material silt content, 6.4 %, from Table 13.2.2-1;
- W = mean vehicular weight (see below);
- M = inherent surface moisture, 10%;
- a = constant, 0.8 for TSP from Table 13.2.2-2;

b = constant, 0.5 for TSP from Table 13.2.2-2;
c = constant, 0.4 for TSP from Table 13.2.2-2;
p = number of days with > 0.01 inches of precipitation per year, 157.8 days;
Spd = facility-posted speed limit, 10 MPH;
VMT = vehicular miles traveled per year (see below); and
CE = fractional control efficiency, 0.50 for watering.

Mean vehicle weight (W) and vehicle miles traveled (VMT) are as follows:

Road Section	W	VMT
Haul from railcar unloading to working face	72.0	42,900
Return from working face to railcar unloading	32.0	42,900
Haul from transfer station to working face	26.7	5,348
Return from working face to transfer station	8.0	5,348
Site supervision	2.5	1,755

F. Miscellaneous Requirements

1. The terms and conditions of this PTI replace the terms and conditions pertinent to this emissions unit in PTI number 02-7440, issued on September 21, 1994.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - Railcar Unloading Operations, including the removal of C&DD material from rail cars and transfer of such material to trucks	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 5.0 tons per year.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from material handling shall not exceed 10% opacity as a three-minute average.
	OAC rule 3745-17-08(B)	Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See Additional Terms and Conditions A.2.b through A.2.g. The limits based on OAC rule 3745-17-07 are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3). The control measures specified by this rule are less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a All material handling at the facility is covered by this permit and subject to the above-mentioned requirements.
- 2.b The permittee shall employ best available control measures on all load-in and load-out operations associated with material handling 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 minimize the drop height to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c The above-mentioned control measure(s) shall be employed for each load-in and load-out operation if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.d The permittee shall employ best available control measures for wind erosion from the surfaces of all material for the purpose of ensuring compliance with the above-mentioned applicable requirements. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e The above-mentioned control measure(s) shall be employed for wind erosion if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary if precipitation (including cover with snow and/or ice) has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f The facility shall install, operate, and maintain a mist sprayer over the railcars being unloaded to minimize visible emissions.
- 2.g 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 rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

- 1. The facility shall operate the mist sprayer any time a railcar is being unloaded. Implementation of the control measures shall not be necessary when snow and/or ice or precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2. The permittee shall implement the control measures specified by the most recent version of the Dust Control Plan as accepted by Ohio EPA, Northeast District Office.

C. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in and load-out operation at the facility on a daily basis.
- 2. Except as otherwise provided in this section, the permittee shall perform inspections of the wind

erosion from material handling at the facility on a daily basis.

3. Except as otherwise provided in this section, the permittee shall perform inspections to ensure the mist sprayer is operating properly on a daily basis.
4. No inspection shall be necessary for wind erosion when there is snow and/or ice coverage or when precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. No inspection shall be necessary for the mist sprayer when there is snow and/or ice coverage or when precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
6. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for material handling and wind erosion. The inspections shall be performed during representative, normal material handling operating conditions.
7. The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
8. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 8.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, (iii) the pile surfaces (wind erosion), and (iv) mist sprayer, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

9. The permittee shall maintain records demonstrating that no regulated asbestos containing material has

been deposited in the landfill.

10. The permittee shall record any time and reason that a control measure specified in the most recent version of the Dust Control Plan accepted Ohio EPA., Northeast District Office, was not implemented.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation;
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented;
 - c. any time a control measure specified in the most recent version of the Dust Control Plan accepted by Ohio EPA, Northeast District Office is not implemented; and
 - d. any time regulated asbestos containing material is received at the railcar unloading operation and the measures that were taken to prevent the regulated asbestos containing material from being disposed.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Emissions Limitation:
Visible emissions shall not exceed 10% opacity as a three minute average.

Applicable Compliance Method:

Compliance with the visible emissions limitations for material handling 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”) and the modifications specified in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

2. Emissions Limitation:
Particulate emissions shall not exceed 5.0 tons per year

Applicable Compliance Method:

Compliance shall be based on a one-time calculation based on the most recent revisions to AP-42 Chapter 13.2.4, equation 1 (currently January 1995). The calculation is as follows, and is equivalent to the emissions unit's annual potential to emit:

$$E = k * (0.0032) * (U/5)^{1.3} / (M/2)^{1.4} * (1 \text{ ton}/2,000 \text{ lbs}) * 1,734,304 \text{ ton/yr} * (1 - CE) * 2$$

Where:

E = annual emissions, in tons per year

k = a constant, 0.74 for PE

U = the mean wind speed for Youngstown (10)

M = the moisture content (estimated at 2.0)

CE = control efficiency for the mist sprayer, and minimizing drop height (0.50)

F. Miscellaneous Requirements

1. None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - C and DD Landfill Operations and associated Material Handling	OAC rule 3745-31-05(A)(3)	<p>Visible particulate emissions from material handling shall not exceed 10% opacity as a three-minute average.</p> <p>No visible particulate emissions except for 1 minute during any 60-minute period from any storage pile.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. (See sections A.2.a through A.2.f.)</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-20-06(B) and 40 CFR 61 subpart M.</p>
	OAC rule 3745-31-02(A)(2)	Particulate emissions shall not exceed 22.6 tons as a 12-month rolling cumulative summation.
	OAC rule 3745-17-07(B)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	The control measures specified by this rule is less stringent than the control

	requirements established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-20-06(B)	See paragraph B. below.
40 CFR 61 subpart M	See paragraph B. below.

2. Additional Terms and Conditions

- 2.a** C&DD landfill operations and associated material handling over the entire landfill area is covered by this permit and subject to the requirements of OAC 3745-31-05(A)(3).
- 2.b** All vehicles coming to, or leaving, the facility that are hauling materials likely to become airborne shall be closed, covered or tarped in order to minimize visible emissions of fugitive dust and to eliminate load loss.
- 2.c** This facility shall verify that C&DD materials are deposited, spread, and compacted in such a manner as to achieve compliance with the limitations specified above.
- 2.d** The facility shall implement the following procedures when depositing C&DD materials:
 - i. any loads which appear to contain dusty C&DD material shall be watered prior to depositing the load;
 - ii. no dusty C&DD material shall be deposited during periods of high wind speed unless it has been treated to prevent it from becoming airborne;
 - iii. this facility shall ensure that all truckloads of C&DD material are unloaded in a manner which will minimize the drop height of the C&DD material and be deposited as near to the point of final placement as possible; and
 - iv. during the dumping of any load of C&DD materials, in which dusty materials become airborne, the C&DD materials shall be watered as necessary.
- 2.e** The facility shall implement the following procedures during handling and stockpiling of the C&DD and cover materials:
 - i. any dusty material that is stored prior to disposal, shall be watered, as necessary, or have a temporary soil cover. All exposed C&DD material shall be covered with cover material by the end of each week's operation; and

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- ii. The facility shall minimize the handling and stockpiling of cover material. Unvegetated cover material and soil in the waste disposal area must be watered as necessary and shall be handled to achieve compliance with the visible emissions limitations. The frequency and amounts of this watering shall depend on weather conditions, cover material conditions and soil conditions.

B. Operational Restrictions

1. The following asbestos requirements are to be met:
 - a. The facility shall not accept for disposal any NESHAP Regulated Asbestos Containing Material (RACM) as defined in the NESHAP Regulation for Asbestos, 40 CFR Part 61, Subpart M, Section 141 amended November 20, 1990 or any subsequent revisions or as defined in any Environmental Protection Agency Interpretive Rules concerning the NESHAP Regulation for Asbestos. This includes: (a) Friable asbestos material, (b) Category I nonfriable asbestos containing material that has become friable, (c) Category I nonfriable asbestos containing material that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II nonfriable asbestos containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.
 - b. This facility shall ensure that any asbestos containing materials shall not become friable while at the landfill. If any asbestos material arrives at or becomes friable at the landfill, this facility shall adequately wet or encapsulate it if necessary to prevent visible emissions, and shall cover it with at least six (6) inches of non-asbestos containing material before the end of the operating day.
 - c. All terms stated in Specific Terms and Conditions B.1.a are defined in the NESHAP regulation for Asbestos, 40 CFR Part 61, Subpart M, Section 141 amended November 20, 1990 or any subsequent revisions or in any Environmental Protection Agency Interpretive ruling concerning the NESHAP for Asbestos.
2. This facility shall be limited to accepting for disposal only C&DD material as defined in Ohio Revised Code 3714.01(C).
3. The facility may not bring onto the facility cover fill material without first applying for and receiving a permit to install for soil storage piles.
4. There shall be no open burning in violation of Ohio Administrative Code (OAC) 3745-19 at this facility.
5. The permittee shall not initiate or allow any salvage operations to be conducted at this location without prior written approval of the Ohio EPA.

6. The facility shall not receive more than 1,734,304 tons, or 2,167,880 cubic yards (using a default density of 0.8 tons/cubic yard) of construction and demolition debris as a 12-month rolling cumulative summation.
7. Leachate shall not be used for dust control.
8. The permittee shall implement the control measures specified in the most recent version of the Dust Control Plan as accepted by Ohio EPA, Northeast District Office.

C. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each active C&DD landfill cell on a daily basis.
2. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from each active C&DD landfill cell surface on a daily basis and each closed C&DD landfill cell surface on a weekly basis.
3. No inspection shall be necessary for wind erosion from the surface of a C&DD landfill cell when the cell is covered with snow and/or ice and for any landfill cell activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-mentioned events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
4. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in of a C&DD landfill cell, and wind erosion from the surface of a C&DD landfill cell. The inspections shall be performed during representative, normal landfill operating conditions.
5. The permittee may, upon receipt of written approval from the Northeast District Office of Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
6. The permittee shall maintain records of the following information:
 - a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. The dates the control measures were implemented; and

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

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

7. The permittee shall record the amount of C&DD waste deposited on a daily and monthly, as well as the 12-month rolling cumulative summation. This record shall detail the amount in cubic yards and tons using the density of 0.8 tons per cubic yard.
8. The permittee shall maintain records demonstrating no regulated asbestos containing material was deposited in the landfill.
9. The permittee shall record any time and reason that a control measure specified in the Dust Control Plan accepted by Ohio EPA, Northeast District Office was not implemented.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation;
 - b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented;
 - c. Each instance in which regulated asbestos containing material was deposited in the landfill; and
 - d. any time a control measure specified in the most recent version of the Dust Control Plan accepted by Ohio EPA, Northeast District Office is not followed.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Visible Emissions Limitation:

Visible emissions shall not exceed 10% opacity as a three minute average.

Applicable Compliance Method:

Compliance with the visible emissions limitations for material handling 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") and the modifications specified in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

2. Visible Emission Limitation:

No visible emissions except for one minute during any sixty-minute period.

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

3. Emission Limit:

Particulate emissions shall not exceed 22.5 tons as a rolling 12-month cumulative summation:

Applicable Compliance Method:

Compliance shall be based on a one-time calculation based on a sum of the most recent revisions of the following equations. The calculation is as follows, and is equivalent to the emissions unit's annual potential to emit:

- a. Material handling, based the most recent revisions to AP-42 Chapter 13.2.4 (currently January 1995), for truck unloading and pushing material into open cell:

$$\text{matl(ton/yr)} = k * (0.0032) * (U/5)^{1.3} / (M/2)^{1.4} * 2 * 1,734,304 \text{ tons/yr} * 1/2,000 * (1 - \text{CE})$$

where:

k = particle size multiplier constant, 0.74

U = mean wind speed for Youngstown, 10 MPH

M = the moisture content (estimated at 2.0)

CE = control efficiency, 0.50 for watering and minimizing drop height

- b. Wind erosion, based upon US EPA's "Control of Open Fugitive Sources", 1988, pg. 4-17, eqn 4-9:

$$\text{wind(ton/yr)} = 1.7 * (s/1.5) * ((365 - W)/235) * (f/15) * A * 1 \text{ ton}/2,000 \text{ lbs} * (1 - \text{CE}) * 365 \text{ days/yr}$$

where:

s = the silt content as a percent, estimated to be 6.4% (for solid waste landfills)

W = the number of days where precipitation exceeded 0.01 inches, 157.8

f = the percent of time wind speeds exceed 12 miles per hour, 26.5%

A = number of acres subject to wind erosion, 10

CE = control efficiency, 0.50 for watering

- c. Excavating, from AP-42 Chapter 13.2.3 (1/95):

$$\text{Excavating (ton/yr)} = (1.2 \text{ ton/acre-month}) * 12 \text{ mos/yr} * 1 \text{ acre} * (1-CE)$$

where: CE = control efficiency, 0.50 for watering

F. Miscellaneous Requirements

1. The terms and conditions of this PTI replace the terms and conditions pertinent to this emissions unit in PTI number 02-7440, issued on September 21, 1994.