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

2/27/2013

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Maria Cruset
Clean Water Ltd.
300 Cherokee Dr
Dayton, OH 45417

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0857751312
Permit Number: P0109690
Permit Type: Initial Installation
County: Montgomery

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
RAPCA; Indiana; Kentucky

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Clean Water Ltd.

Facility ID:	0857751312
Permit Number:	P0109690
Permit Type:	Initial Installation
Issued:	2/27/2013
Effective:	2/27/2013

Division of Air Pollution Control
Permit-to-Install
for
Clean Water Ltd.

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Authorization

Facility ID:	0857751312
Facility Description:	off site waste and recovery operations
Application Number(s):	A0043233
Permit Number:	P0109690
Permit Description:	Permit To Install for installation of new sources: G-cone tank, sludge press discharge tank, and sludge press roll off container.
Permit Type:	Initial Installation
Permit Fee:	$2,900.00
Issue Date:	2/27/2013
Effective Date:	2/27/2013

This document constitutes issuance to:

Clean Water Ltd.
300 Cherokee Drive
Dayton, OH 45417

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

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the 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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0109690
Permit Description: Permit To Install for installation of new sources: G-cone tank, sludge press discharge tank, and sludge press roll off container.

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

Emissions Unit ID:	**P040**
Company Equipment ID:	Bldg G Sludge Press Roll-Off
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Tanks, Level 2 control:

Emissions Unit ID:	**T117**
Company Equipment ID:	G-4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T118**
Company Equipment ID:	Sludge Discharge
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Regional Air Pollution Control Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Regional Air Pollution Control Agency. The written 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 A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Regional Air Pollution Control 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Regional Air Pollution Control 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).

6. Compliance Requirements

a) 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.

b) 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.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Regional Air Pollution Control Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 Regional Air Pollution Control 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 Regional Air Pollution Control 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

a) 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.

b) If applicable, authorization to install any new 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 has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

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

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.

16. 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.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The facility is subject to MACT 40 CFR Part 63, Subpart DD, National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations. The permittee shall comply with the applicable provisions of the MACT as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DD. Various standards and compliance requirements of 40 CFR Part 63, Subpart DD are applicable to not only permitted emissions units but also their auxiliary components that affect air emissions. In addition, Subpart DD cross-references the following other subparts in Part 63 for the air emissions control requirements to be applied to specific types of affected sources.

   Subpart OO National Emission Standards for Tanks - Level 1

   Subpart PP National Emission Standards for Containers

   Subpart QQ National Emission Standards for Surface Impoundments

   Subpart RR National Emission Standards for Individual Drain Systems

   Subpart VV National Emission Standards for Oil-Water Separators and Organic-Water Separators

   The permittee currently has no emissions units or sources of emissions subject to Subpart QQ National Emission Standards for Surface Impoundments.

3. As specified in 40 C.F.R Part 63.6(e)(3), the permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the Startup, Shutdown, and Malfunction Plan (SSMP) (Revision 2.0, 10/2008 or the most recent acceptable update of this plan) for operating and maintaining affected emissions units during periods of startup, shutdown, and malfunction.

4. The permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the “TANKER LOADING” Standard Operating Procedure manual (Rev 3, 9/2011 or the most recent acceptable update of this plan) for loading tanker trucks.

5. The permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the “MATERIAL ACCEPTANCE” Standard Operating Procedure manual (Rev 3, 9/2011 or the most recent acceptable update of this plan) for assuring the facility will not violate limitations of this permit, Subpart DD, or cause excessive odors off-site from the facility.

6. The permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the “SOLIDIFICATION PROCESS” Standard Operating Procedure manual (Rev 2, 9/2011 or the most recent acceptable update of this plan) to set operating limitations on the solidification process to maintain unit exemption pursuant to 40 CFR Part 63, Subpart DD.

7. The permittee shall conduct a visual inspection of the all containment areas for liquid leaks of off-site materials from tanks and transfer systems located within the containment areas at least once every operating day. Repairs must be made as soon as possible, and recordkeeping of the daily inspections and repairs shall be done, in accordance with the procedures identified in the “CONTAINMENT

AREAS" Standard Operating Procedure manual (Rev 1, 6/10 or the most recent acceptable update of this plan). These records must be retained at the facility for a minimum of three years.

8. The permittee shall implement on-going measures to minimize and reduce odors from all emissions units at the facility.

9. The emissions of organic compounds (OC) combined for the facility shall not exceed 25.92 tons per year, based upon a rolling, 12-month summation of the monthly emissions. This emissions limitation supersedes the rolling, 12-month summation limitation of 24.36 tons per year established in Permit To Install (PTI) #P0105924 issued 11/2/2010. This permit reflects an increase of 1.56 tons in the facility wide OC emissions limitation.

   In addition to the emissions units contained in this permit (P040, T117 and T118), emissions units permitted under PTI #P0105924 (P002 through P004, P006, P007, P010 through P016, P018 through P022, P025 through P035, P037, P038, and T044 through T077, T079 through T107) issued 11/2/2012, PTI #P0106269 (T108 through T114) issued 06/28/2010, and P0108357 (P039) issued 08/09/2011 are included in the combined emissions limitation cited in this permit. The permittee has permanently shutdown emissions units P036, T078, and T115 whose emissions have been excluded from the limitation.

   The permittee shall calculate and maintain monthly records of the OC emissions and the rolling 12-month emissions of OC. Compliance shall be based upon the record keeping requirements specified in B.10 of this permit and in accordance with the applicable compliance method in B.13.

10. The permittee shall maintain monthly records of the following information:

    a) the number of hours the facility operated;

    b) the number of hours the closed-vent and the regenerative thermal oxidizer (RTO) system operated;

    c) the number of hours when any units controlled by the RTO system were in operation when their emissions were either not vented to the RTO or the RTO was not in operation;

    d) the controlled OC emissions for emissions units controlled by the closed-vent and RTO system when the control system was operating; and the uncontrolled OC emissions for when the control system was not operating;

    e) the OC emissions for emissions units not controlled by the closed-vent and RTO system;

    f) the total monthly OC emission rate [10.d) plus 10.e)] for each month of operation; and

    g) the rolling, 12-month summation of the monthly emissions.

11. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for OC. These reports are due by the date prescribed in the Standard Terms and Conditions of this permit under Section A.

12. The permittee shall submit annual reports that specify the OC emissions from the facility for the previous calendar year. The reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

13. Compliance with the emission limitations in B.9 shall be determined in accordance with the following methods:

    a) Emission Limitation:

    The OC emissions shall not exceed 25.92 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

    Applicable Compliance Method:

    Compliance with this emissions limitation shall be demonstrated as follows:

    (1) For emissions units controlled by the closed-vent and RTO system:

    a. For P002 through P004, P006, P007, P039, T063 through T077, and T079 through T107:

    The maximum hourly OC emissions of 3.69 lbs/hour from these emissions units is determined from stack testing (conducted on 8/19 – 8/21, 2010) by multiplying the measured uncontrolled emissions of 56.70 lbs/hr OC as propane by the minimum required destruction efficiency of (1- 0.95%) and then multiplying by a factor of 1.30 (i.e., plus 30%) to account for production growth and production variations.

    b. For T117 and T118:

    The maximum hourly OC emissions of 0.04 lbs/hour from these emissions units were determined by adding the combined uncontrolled emissions calculated for T117 and T118 (0.889 lb/hr, and then multiply by the minimum required destruction efficiency of (1- 0.95%).

    c. The maximum annual OC emissions of 16.34 tons/year from the RTO are determined by the summing the hourly emissions from a)(1)a. plus a)(1)b. and multiplying by 8760 hours/year and dividing by 2000 lbs/ton.

    d. The monthly OC emissions of 1.36 tons/month from the RTO are determined by dividing the annual emissions from a)(1)c. by 12 months/year.

    e. Actual emissions for units controlled by the RTO are calculated by multiplying the uncontrolled emissions of OC as propane by the minimum actual destruction efficiency measured during the most recent emissions testing.

    (2) For emissions units not controlled by the closed-vent and RTO system:

    a. For P010 through P016, P018 through P022, P025 through P035, P037, P038, T044 through T062, and T108 through T114:

The maximum annual OC emissions of 7.83 tons/year from these emissions units were determined using Water9 and Tanks4.9 modeling software, USEPA Document EPA-453/R95-017 ("Protocol for Equipment Leak Emission Estimate", November 1995), USEPA Document EPA-453/R94-080A ("Air Emissions Models for Waste and Wastewater", November 1994), or emission factors determined in "Expert Report of Thomas Robertson In the Matter of Barbara Fisher, et al versus Perma-Fix of Dayton, Inc." dated December 15, 2006, resulting in a combined calculated OC emissions of 6.02 tons/year, and multiplied by factor of 1.30 to account for production growth and production variations. (Calculations by Thomas Robertson were for hazardous air pollutants (HAP) only and are multiplied by an adjustment factor of 1.35, derived from speciation testing of RTO inlet emissions stream, to account for expected total OC.)

b. For P040:

The maximum annual OC emissions of 1.75 tons/year from this emissions unit was determined using an emissions factor from "Air Emissions Models for Waste Water", US EPA Document EPA-453/R-94-080A, 11/1994. The PTE was determined to be 0.40 lb/hr and 1.75 ton/year.

c. The maximum monthly OC emissions of 0.80 tons/month from these emissions units are determined by summing the annual emissions from a)(2)a. and a)(2)b. and diving by 12 months/year.

d. The hourly OC emissions of 2.19 lbs/hour from these emissions units is determined by summing the annual emissions from a)(2)a. plus a(2)b., multiplying by 2000 lbs/ton and dividing by 8760 hours/year.

(3) The monthly emissions limitation of 2.16 tons/month is determined by the summation of a)(1)d. and a)(2)c. Compliance shall be based upon the record keeping requirements specified in B.10 of this permit.

(4) The annual emissions limitation of 25.92 tons/year is determined by multiplying the monthly emission limitation from a)(3) by 12 months/year.

14. Pursuant to the Regional Air Pollution Control Agency Administrative Findings and Orders issued to Clean Water Limited effective January 2, 2013, the permittee shall conduct, or have conducted, semi-annual comprehensive inspections of the RTO control system to assess any operational issues and to perform preventative maintenance. The inspections began in 2013 and shall continue after termination of the Findings and Orders agreement. A copy of the inspection/maintenance report and a list of repairs, maintenance and/or other work performed shall be maintained on site for a period of no less than 5 years.

C. Emissions Unit Terms and Conditions

1. P040, Bldg G Sludge Press Roll-Off

Operations, Property and/or Equipment Description:

WWTP - Sludge Press Filter Cake Roll-off Container (20 yd3) for Solids located in Bldg G

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The organic compounds (OC) emissions from this emissions unit shall not exceed 0.40 lb/hr and 1.75 ton per year. See b)(2)e.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)f.
c.	40 CFR Part 63, Subpart DD	See b)(2)a. through b)(2)d. below.
d.	40 CFR Part 63, Subpart A	See b)(2)d below.
d.	OAC rule 3745-21-07(M)(3)(c)(ii)	The uncontrolled potential to emit for OC from each emissions unit does not exceed 40 pounds per day.

(2) Additional Terms and Conditions

a. All equipment and components and the closed-vent system associated with these emissions unit must comply with the applicable requirements included in Section B – Facility Wide Terms and Conditions.

b. The permittee will comply with the standards identified in Section 63.688(b)(3) of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and Section 63.923 of Subpart PP of 40 CFR Part 63 - National Emission Standards for Containers to control the emissions from this emission unit.

c. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-007, October 4, 1999.

d. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.

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

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

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

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(3) of Subpart DD and 63.923(b) of 40 CFR Part 63 Subpart PP	level 2 standards and control for containers
63.688(b)(3) of Subpart DD and 63.923(c) – (d) of 40 CFR Part 63 Subpart PP	operation of containers using level 2 controls
63.688(b)(3) of Subpart DD, and 63.923(b) and 63.926(a) of 40 CFR Part 63 Subpart PP	criteria for containers that can be used for level 2 control

(2) This emissions unit shall not be used for treatment of material by a waste stabilization process as defined in section 63.681 of 40 CFR Part 63, Subpart DD.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(3) of Subpart DD, and 63.923(e) and 63.926(a) of 40 CFR Part 63 Subpart PP	inspection of containers using level 2 controls
63.688(b)(3) of Subpart DD, and 63.923(b)(1) and 63.923(f) of 40 CFR Part 63 Subpart PP	procedures to determine containers meet U.S. DOT regulations when using that level 2 control option
63.688(b)(3) of Subpart DD, and 63.923(b)(2) and 63.925(a) of 40 CFR Part 63 Subpart PP	procedures to determine containers operate with no detectable organic emissions when using that level 2 control option
63.688(b)(3) of Subpart DD, and 63.923(b)(2) and 63.925(b) of 40 CFR Part 63 Subpart PP	procedures to determine containers are vapor tight when using that level 2 control option

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements

f) Testing Requirements

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

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

The OC emissions from this emissions unit shall not exceed 0.40 lb/hr.

<u>Applicable Compliance Method:</u>

The hourly OC emissions limit was determined by multiplying the emissions factor 8.598 lb VOC/20 yd^3 sludge turnover obtained from Air Emissions Models for Waste and Wastewater, EPA Document EPA-453/R-94-080A multiplied by 0.94 yd^3/hour press capacity. It was established to reflect the potential to emit for

this emissions unit. Record keeping of the process emissions is not required since the emissions unit is permitted at its potential to emit.

b. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 1.75 ton per year.

Applicable Compliance Method:

c. Compliance with this emissions limitation shall be demonstrated by multiplying the hourly potential emissions rate by 8760 hours/year and dividing by 2000 lbs/ton, and represents the unrestricted potential to emit for OC emissions from this emissions unit. Record keeping of the process emissions is not required since the emissions unit is permitted at its potential to emit.

g) Miscellaneous Requirements

(1) Emissions unit P040 was not a part of the Consent Decree (Civil Action No. 3:04 CV 00418) entered and filed on 2/12/2008, in the United States District Court for Southern District of Ohio Western Division. The installation and permitting of this emissions unit does not change the permitting status of the facility or the Consent Decree.

2. Emissions Unit Group -Tanks, Level 2 control: T117, T118. Each unit has a fixed roof vented through closed-vent system to a demister followed by a RTO control device equipped with a VOC entrapment chamber at the outlet of the RTO.

EU ID	Operations, Property and/or Equipment Description
T117	G-4 (T-801D; G-cone high solids process vessel, 14,920 gallons)
T118	Sludge Press Discharge Tank, Bldg G (6,012 gallon)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The organic compounds (OC) emissions from these emissions units shall not exceed: T117: 0.038 lb/hr or 0.17 ton per year; T118: 0.006 lb/hr or 0.03 ton per year. See b)(2)i. See b)(2)g.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)h.
c.	40 CFR Part 63, Subpart DD	See b)(2)a. through b)(2)f. below.
d.	40 CFR Part 63, Subpart A	See b)(2)f. below.
e.	OAC rule 3745-21-07(M)(3)(c)(ii)	The uncontrolled potential to emit for OC emissions from each emissions unit does not exceed 40 pounds per day.

(2) Additional Terms and Conditions

a. All equipment and components and the closed-vent system associated with these emissions unit must comply with the applicable requirements included in Section B – Facility Wide Terms and Conditions.

b. The standards that apply to these emissions units are identified in Section 63.685 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.

c. The total OC (less methane and ethane) or total HAP (see Table 1 to Subpart DD of 40 CFR Part 63) emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC (less methane and ethane) or HAP, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen. The RTO shall be equipped and operated with an emissions entrapment chamber at the outlet of the RTO.

d. Subpart DD of 40 CFR Part 63 contains a provision that allows 240 hours of operation without the RTO during "planned routine maintenance" as defined under 40 CFR Part 63.693(b)(3)(i). During planned routine maintenance, these emissions units are subject to OAC rule 3745-15-06(A)(3). Malfunctions of the air pollution control equipment are subject to reporting requirements of OAC rule 3745-15-06(B).

e. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-007, October 4, 1999.

f. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.

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

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

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

i. Based on the information and data submitted by the permittee in the application for permit P0109690, the hourly OC emissions limit was established to reflect the after control potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation. Based on this hourly potential emissions rate, the unrestricted potential to emit for OC emissions from

this emissions unit, based on 8,760 hours (365 days) of operation per year, is 0.17 tons per year for emissions unit T117 and 0.03 tons per year for emissions unit T118. Record keeping of the process emissions is not required since the emissions unit is permitted at its potential to emit.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.685(d)(3) and (g)	standards for tanks using level 2 control by using a closed-vent system to a control device
63.685(d)(3) and (g)(2)	operation of tanks using level 2 control by using a closed-vent system to a control device
63.693(c)(1)(ii)	requirements for closed-vent system designed to operate below atmospheric pressure
63.693(c)(2)	requirements for closed-vent system that includes bypass device
63.693(b)(3)	operation, shutdown, and routine maintenance of control device
63.693(f)	vapor incinerator control device requirements
63.693(f)(1)	performance specifications for vapor incinerator control device (destruction efficiency)

(2) In accordance with criteria specified in 40 CFR Part 63.685(d)(3) and (g), emissions from the emissions units listed above shall be captured and controlled using a fixed roof that is vented through a closed-vent system to a control device and the emissions shall be directed to the RTO for controlling the emissions.

For the emissions units listed above, the OC emissions from each unit shall be shall be vented through the closed-vent system to the RTO anytime the unit is in service and operational. The permittee shall operate the closed-vent system and RTO for control of emissions whenever one or more of the emissions units are in operation.

(3) The permittee shall operate and maintain a continuous monitoring and recording system which measures and records the combustion chamber temperature, recovery bed temperature, and stack exhaust temperature for the RTO when the emissions units are

in operation. The monitoring and recording devices shall meet the accuracy specification listed in 40 CFR Part 63.693(f)(3)(i). The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and conform with the criteria of 40 CFR Part 63.695(e).

(4) In accordance with criteria specified in 40 CFR Part 63.693(c)(1)(ii), the closed-vent system shall be designed and operated at a pressure below atmospheric pressure. A permanent pressure monitor shall be installed at a location(s) on the closed-vent system that will verify that negative pressure is being maintained in the entire closed-vent system when the emissions units and control device are operating.

(5) A pressure monitor shall be installed at a location immediately upstream of the RTO fan. A data acquisition system shall be installed and operated to continuously monitor and record the pressure inside the closed-vent system at this location. The pressure monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and conform with the criteria of 40 CFR Part 63.695(e).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.693(c)(1)(ii)	monitor pressure in closed-vent system
63.693(b)(4), 63.685(g)(3) and 63.695(c)	inspection, monitoring and recordkeeping requirements of closed-vent system
63.693(b)(5) through (6), 63.696(b) and 63.695(e)	monitoring and recordkeeping requirements of control device
63.693(f)(3)	monitoring and recording temperature for vapor incinerator control device
63.695(e)(4)	excursion determination and criterion for control device
63.696(b)	recordkeeping requirements for control device
63.696(e)	inspection and monitoring of tanks using fixed roof

63.696(g)	semiannual records for planned routine maintenance operations for control device
63.696(h)	records for unexpected control device malfunctions

(2) The permittee shall perform quarterly inspections of the closed-vent system using the procedures outlined in 40 CFR Part 63.695(c).

(3) In order to maintain compliance with applicable emission limitations/control requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature measured within the RTO, when the emissions units controlled by the RTO are in operation, shall not be less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance (The minimum combustion temperature was determined to be 1557 degrees Fahrenheit from compliance demonstration testing conducted on August 14, 2012.).

(4) In order to maintain compliance with requirements contained in this permit, the recovery bed temperature and stack exhaust temperature for the RTO must be continuously measured when the emissions units controlled by the RTO are in operation.

(5) In order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the permittee shall observe the pressure monitor(s) installed on the closed-vent system specified in c)(4) above at least once per day on days the emissions units are operating, and record the observed measured pressure. The pressure monitoring locations shall include those which were monitored during the most recent performance stack test that demonstrated that negative pressure was maintained in the entire closed-vent system. In the event the pressure monitor(s) indicates there is not negative pressure in the closed-vent system, the permittee shall take necessary action to remedy the problem as soon as possible including, but not limited to, taking applicable actions prescribed in its Startup, Shutdown, and Malfunction plan. Records associated with these requirements shall be kept on site and available for inspection for a minimum of three years.

(6) In order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the acceptable daily average value for the pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan as specified in c)(5) above, when the emissions units controlled by the RTO are in operation, shall be at a minimum differential pressure that is not less than the minimum differential pressure established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance (The minimum differential pressure was determined to be -0.71 inch water from compliance demonstration testing conducted on August 14, 2012.).

(7) The permittee shall collect and record the following information each day for the capture and control equipment:

a. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature within the RTO was less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;

b. all days and instances when the emissions units controlled by the RTO were in operation during which the recovery bed temperature and stack exhaust temperature for the RTO were not measured;

c. all days and instances when the emissions units were in operation, when it was observed that any of the pressures recorded per c)(4) above for the closed-vent system were not negative;

d. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan was less than the minimum differential pressure established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance; and

e. a log of the downtime for the closed-vent system, RTO, VOC entrapment chamber, and monitoring equipment when the associated emissions units were in operation.

(8) Whenever the monitored daily average value for the combustion temperature for the RTO; the daily average value for pressure measured inside the closed-vent system immediately upstream of the RTO fan; or the pressures of the closed-vent system deviates from the limits specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date the corrective action was completed;

c. the date and time the deviation ended;

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

e. the temperature readings and/or pressure differential readings, as appropriate, immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements
63.697(a)(1) of Subpart DD and 63.9(h) of 40 CFR Part 63 Subpart A	notification of compliance status, within 60 days after compliance demonstration activity (performance test)
63.697(b)(1)	notification of performance tests
63.697(b)(2)	performance test reports
63.697(b)(3)	startup, shutdown, and malfunction reports
63.697(b)(4)	semi-annual summary report

(2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the closed-vent system and the RTO during the operation of the emissions units:

a. each day when the average daily combustion temperature measured for the RTO fell below the minimum temperature limitations specified in this permit;

b. each day and instance when the recovery bed temperature and stack exhaust temperature for the RTO were not measured;

c. each day and instance when it was observed that any of the pressures in the closed-vent system were not negative;

d. each day when the daily average pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan was less than the minimum differential pressure limitation specified in this permit;

e. an identification of each incident of deviation described in d)(8) above where a prompt investigation was not conducted;

f. an identification of each incident of deviation described in d)(8) where prompt corrective action, that would bring the specified parameters into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in d)(8) where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(3) The permittee shall submit deviation (excursion) reports that identify any of the following when the emissions units were in operation:

a. dates and time periods when the OC emissions were not vented to the RTO;

b. dates and times when the VOC entrapment chamber was not operable;

c. dates and time periods when the monitored daily average value for the combustion temperature for the RTO; the daily average value for pressure measured inside the closed-vent system immediately upstream of the RTO fan; or the pressures of the closed-vent system deviated from the limits specified in this permit.

These reports shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

(1) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.694(a)(11) and 63.694(l)	testing methods and procedures to determine closed-vent and control device performance

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

a. Emission Limitation:

The OC emissions from these emissions units shall not exceed:

T117 - 0.038 lb/hr;

T118 – 0.006 lb/hr.

Applicable Compliance Method:

The hourly limitations are based on using Water 9 wastewater model, USEPA Document EPA-453/R94-080A ("Air Emissions Models for Waste and Wastewater", November 1994), and emission factors determined in "Expert Report of Thomas Robertson In the Matter of Barbara Fisher, et. al. versus Perma-Fix of Dayton, Inc." dated December 15, 2006, and are established to reflect the after control potential to emit for these emissions units. Record keeping of the process emissions is not required since the emissions unit is permitted at its potential to emit.

b. Emission Limitation:

The OC emissions from these emissions units shall not exceed:

T117 - 0.17 ton per year;

T118 – 0.03 ton per year.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by multiplying the hourly potential emissions rate by 8760 hours/year and dividing by 2000 lbs/ton, and represents the unrestricted after control potential to emit for OC emissions from this emissions unit. Record keeping of the process emissions is not required since the emissions unit is permitted at its potential to emit.

c. Emission Limitation:

The total OC (less methane and ethane) or total HAP [defined in 40 CFR Part 63.693(f)(1)(ii) and Table 1 of 40 CFR Part 63, Subpart DD emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC, less methane and ethane, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen.

Applicable Compliance Method:

Capture of the OC emissions from these emissions units shall be achieved by use of a closed-vent system. The system shall be maintained under sufficient negative pressure to assure all of the emissions from the emissions units are captured. 40 CFR Part 63, Subpart DD requires that the permittee demonstrate the control device achieves the applicable performance requirements by conducting a compliance performance test of the closed-vent system and the control device (RTO) in accordance with the requirements specified in 40 CFR Part 63.693.

When conducting the performance test, 40 CFR Part 63 Subpart DD requires testing to be performed in accordance with and using the testing and procedures prescribed in 40 CFR Parts 63.694(a)(11) and 63.694(l). The sampling sites shall be selected using Method 1 or 1A of 40 CFR Part 60, appendix A , as appropriate, in accordance with 40 CFR Part 63.694(l)(1)(i). The gas volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D of 40 CFR Part 60, appendix A, as appropriate, in accordance with 40 CFR Part 63.694(l)(2). Compliance with the RTO total OC or total HAP destruction requirement shall be determined in accordance with the methods and procedures specified in 40 CFR Part 63.694(l)(3). Alternatively, any other method or data that has been validated according to the applicable procedures in Method 301 in 40 CFR Part 63, appendix A of this part may be used with approval of US EPA and the appropriate Ohio EPA District office or local air agency. The facility submitted an alternative method request to USEPA to allow use Method 25A in lieu of Method 18 (40 CFR Part 60, appendix A) for determining the RTO percent reduction requirement to USEPA, which was approved in letter from USEPA dated June 11, 2009.

(3) The permittee shall conduct emissions and compliance demonstration testing in accordance with the following requirements:

a. Emissions testing shall be conducted to demonstrate compliance with the required overall control efficiency of 95%. In accordance with test methods and procedures specified in 40 CFR Subpart DD and by USEPA, the following shall be employed to measure the mass emission rates before and after the RTO to demonstrate compliance with the destruction requirement: USEPA test Methods 1 through 4 and 25A of CFR Part 60, Appendix A.

b. An evaluation of the closed-vent system shall be conducted in conjunction with the compliance demonstration testing of the RTO in accordance with the following requirements.

i. Perform an inspection of the closed-vent system for defects that could result in emissions leaks using the procedures outlined in 40 CFR Part 63.695(c)(2).

ii. Measure the pressure differential between the inside of the closed-vent system and the atmosphere [see c)(4), c)(5), d)(5) and d)(6) above] during compliance demonstration of the RTO to demonstrate compliance with the requirement that the closed-vent system be maintained under negative pressure.

The testing shall be conducted while emissions units vented to the closed-vent system and RTO are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emissions test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

(4) An initial compliance demonstration test, which included operation of the emissions units contained in this permit, that fulfilled the requirements of f)(3), was conducted on August 14, 2012. Future testing of the closed-vent system and RTO will be determined by the Ohio EPA District Office or local air agency in the TV permit and other PTIs when required.

g) Miscellaneous Requirements

(1) Emissions units P040, T117 and T118 contained in this permit were not a part of the Consent Decree (Civil Action No. 3:04 CV 00418) entered and filed on 2/12/2008, in the United States District Court for Southern District of Ohio Western Division. The installation and permitting of these emissions units do not change the permitting status of the facility or the Consent Decree.