



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

2/28/2013

CONNIE DALL
BOBMEYER ROAD SANITARY LANDFILL
5092 ABER RD
WILLIAMSBURG, OH 45176

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409030593
Permit Number: P0112891
Permit Type: Renewal
County: Butler

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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 PTIO 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 Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: SWOQA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
BOBMEYER ROAD SANITARY LANDFILL**

Facility ID:	1409030593
Permit Number:	P0112891
Permit Type:	Renewal
Issued:	2/28/2013
Effective:	2/28/2013
Expiration:	2/28/2023



Division of Air Pollution Control
Permit-to-Install and Operate
for
BOBMEYER ROAD SANITARY LANDFILL

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Final Permit-to-Install and Operate
BOBMEYER ROAD SANITARY LANDFILL
Permit Number: P0112891
Facility ID: 1409030593
Effective Date: 2/28/2013

Authorization

Facility ID: 1409030593
Application Number(s): A0046745
Permit Number: P0112891
Permit Description: PTIO Renewal permit for Closed MSW/CDD Landfill with Gas Collection System and Enclosed Flare.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 2/28/2013
Effective Date: 2/28/2013
Expiration Date: 2/28/2023
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

BOBMEYER ROAD SANITARY LANDFILL
2841 BOBMEYER RD
FAIRFIELD, OH 45014

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

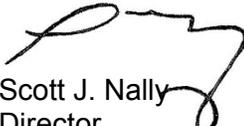
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Final Permit-to-Install and Operate
BOBMEYER ROAD SANITARY LANDFILL
Permit Number: P0112891
Facility ID: 1409030593
Effective Date: 2/28/2013

Authorization (continued)

Permit Number: P0112891

Permit Description: PTIO Renewal permit for Closed MSW/CDD Landfill with Gas Collection System and Enclosed Flare.

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

Emissions Unit ID:	P001
Company Equipment ID:	Closed Landfill Gas Collection System
Superseded Permit Number:	P0096749
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
BOBMEYER ROAD SANITARY LANDFILL
Permit Number: P0112891
Facility ID: 1409030593
Effective Date: 2/28/2013

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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



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

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

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

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

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

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



Final Permit-to-Install and Operate
BOBMEYER ROAD SANITARY LANDFILL
Permit Number: P0112891
Facility ID: 1409030593
Effective Date: 2/28/2013

B. Facility-Wide Terms and Conditions



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



Final Permit-to-Install and Operate
BOBMEYER ROAD SANITARY LANDFILL
Permit Number: P0112891
Facility ID: 1409030593
Effective Date: 2/28/2013

C. Emissions Unit Terms and Conditions



1. P001, Closed Landfill Gas Collection System

Operations, Property and/or Equipment Description:

Closed MSW/CDD Landfill with Gas Collection System and Enclosed Flare - Modification

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(5), d)(6), d)(7) and d)(8).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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)	Particulate emissions (PE) shall not exceed 0.80 pound per hour and 3.5 tons per year. Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 0.80 pound per hour and 3.5 tons per year. Sulfur dioxide (SO2) emissions shall not exceed 0.85 pound per hour and 3.7 tons per year. Nitrogen oxides (NOx) emissions shall not exceed 3.1 pounds per hour and 13.4 tons per year. Carbon monoxide (CO) emissions shall not exceed 15.3 pounds per hour and 67



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		tons per year. Volatile organic compound (VOC) emissions shall not exceed 0.97 pound per hour and 4.2 tons per year. Hydrogen chloride (HCl) emissions shall not exceed 0.59 pound per hour and 2.6 tons per year. See terms and conditions b)(2)a, through b)(2)c. and c)(1) through c)(4). Visible particulate emissions from the flare shall not exceed 10 percent opacity, as a six-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-19, OAC rule 3745-20-07 and 40 CFR Part 61, Subpart M.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-19	See c)5.
d.	40 CFR Part 61, Subpart M and OAC rule 3745-20-07	See terms b)(2)e and b)(2)f.

(2) Additional Terms and Conditions

a. Gas Collection System

Design, construction, and siting of the gas extraction wells and collection system shall be in accordance with the Bobmeyer Road Landfill PTI application submitted March 8, 1994, and the standard industry methods and practices currently in use. In addition, the gas collection system shall:

- i. Be designed to handle the maximum expected flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment;
- ii. Collect gas from each area of the landfill in which refuse has been placed for a period of 2 years or more when the adjacent gas monitoring probes indicate offsite migration; and



- iii. Collect gas at a sufficient extraction rate.
- b. Control System

All landfill gas collected shall be routed to the control system (enclosed smokeless flare) designed and operated, within the parameter ranges demonstrated in the initial performance test or the most recent performance test that demonstrated compliance, to reduce NMOCs by 98 weight-percent or to reduce outlet NMOC concentration to 20 ppm (as hexane) by volume at three percent oxygen, or less.
- c. The equipment that constitutes the gas collection and control system shall be properly maintained and kept in good operating condition at all times. The equipment shall be operated and maintained by personnel properly trained in its operation.
- d. The hourly emission limitations outlined in b)(1). are based on the emission unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- e. The permittee shall comply with one of the following requirements for this inactive waste disposal site containing asbestos:
 - i. discharge no visible emissions from the inactive waste disposal site; or
 - ii. cover the asbestos-containing waste material with at least six inches of compacted nonasbestos-containing material, and grow and maintain a cover of vegetation on the area adequate to prevent exposure of the asbestos-containing waste material; or
 - iii. cover the asbestos-containing waste material with at least two feet of compacted nonasbestos-containing material, and maintain the cover to prevent exposure of the asbestos-containing waste material.
- f. Unless a natural barrier adequately deters access by the general public to the inactive asbestos waste disposal site, the permittee shall install and maintain warning signs and fencing as follows, or comply with OAC rule 3745-20-07(A)(2) or (A)(3) of this rule:
 - i. Display warning signs at all entrances and at intervals of three hundred feet or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited. The warning signs must:
 - (a) be posted in such a manner and location that a person can easily read the legend; and
 - (b) conform to the requirements for a twenty-inch by fourteen-inch upright format warning sign and display the following legend in the lower panel with letter sizes of at least one inch sans serif.



Spacing between any two lines must be at least equal to the height of the upper of the two lines:

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

- ii. Fence the perimeter of the site in a manner adequate to deter access by the general public.
 - g. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a gas collection system with an enclosed flare.
- c) Operational Restrictions
- (1) Whenever the enclosed flare is in operation, a temperature of at least 1400 degrees Fahrenheit (or the temperature during the most recent compliance test which demonstrated compliance with the NMOC limits) must be maintained.
 - (2) In the event the control system detects a no flame condition which cannot be immediately restarted, the gas collection system shall automatically shut down the flow of landfill gas.
 - (3) The skin temperature of the flare shroud within four feet of all the source test ports shall not exceed 250 degrees Fahrenheit. If a heat shield is required to meet the requirement, its design shall be approved by the appropriate Ohio EPA District Office or local air agency prior to its construction. The heat shield, if required to meet the temperature requirement, shall be in place whenever a source test is conducted for the OhioEPA.
 - (4) Any section of landfill material exposed during construction shall be covered as soon as possible once construction of that section is complete.
 - (5) The permittee shall not cause or allow any open burning at this location in violation of OAC Chapter 3745-19.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the flare when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature 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. Recording devices shall be synchronized based on the time of day.



The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the enclosed flare, when the emissions unit was in operation, was less than 1400 degrees Fahrenheit; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (2) The permittee shall maintain monthly records of the total emissions, in tons, for NO_x, PE/PM₁₀, CO, SO₂, VOC, and HCl in order to monitor compliance with the annual emission limitations.
 - (3) The permittee shall operate and maintain a temperature monitor and recorder which measures and records the skin temperature of the flare shroud when emissions testing is being conducted for the flare. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
 - (4) The permittee shall maintain records of the location, depth and area, and quantity in cubic yards of all asbestos-containing waste materials within the disposal site, on a map or diagram of the disposal area.
 - (5) The permit to install for this emissions unit P001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrogen chloride

TLV (ug/m³): 2200

Maximum Hourly Emission Rate (lbs/hr): 0.59

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.45

MAGLC (ug/m³): 52.4

Pollutant: Toluene

TLV (ug/m³): 188,400

Maximum Hourly Emission Rate (lbs/hr): 0.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.28

MAGLC (ug/m³): 4486



- (6) Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (7) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
- (8) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.



e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall include in the PER any temperature deviations reports which identify all 3-hour blocks of time during which the average flare temperature is less than 1400 degrees Fahrenheit (or the temperature during the most recent compliance test which demonstrated compliance). This report shall contain, at a minimum, the date, time of occurrence, cause, explanation, and corrective actions taken for any times when the temperature falls below the limit established during the initial performance test. If no deviation has occurred, the permittee shall submit a statement to that effect.
- (4) The permittee shall submit annual reports that specify the total PE/PM10, SO₂, NO_x, CO, VOC, and HCl emissions from this emissions unit for the previous calendar year to the Southwest Ohio Air Quality Agency. These reports shall be submitted by January 31st of each year.
- (5) The permittee shall submit, upon closure of the facility, a copy of the records of the asbestos waste disposal locations and quantities to the appropriate Ohio EPA District Office or local air agency.
- (6) The permittee shall notify the appropriate Ohio EPA District Office or local air agency in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided at least 10 working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. The following information shall be included in the notice:
 - a. Scheduled starting and completion dates.
 - b. Reason for disturbing the waste.
 - c. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. (If deemed necessary, the Director may require changes in the proposed emission control procedures).
 - d. Location of any temporary storage site and the final disposal site.



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:

PE shall not exceed 0.80 pound per hour;
PM10 emissions shall not exceed 0.80 pound per hour;
SO2 emissions shall not exceed 0.85 pound per hour;
NOx emissions shall not exceed 3.1 pounds per hour;
CO emissions shall not exceed 15.3 pounds per hour;
VOC emissions shall not exceed 0.97 pound per hour; and
HCl emissions shall not exceed 0.59 pound per hour.

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and the permittee's emissions data and technical analysis found in the application for PTI 14-03423, submitted November 19, 2004.

The permittee demonstrated compliance with the hourly CO, VOC, and HCl emission limitation based upon the results of the initial emission testing required in Section E.2 below. If required, the permittee shall demonstrate compliance with the hourly CO, VOC, and HCl emission limits through additional emission tests performed in accordance to the methods specified in Section E.2.

If required, the permittee shall demonstrate compliance with the hourly PE/PM10 emission limitation through emission tests performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation through emission tests performed in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

If required, the permittee shall demonstrate compliance with the hourly SO2 emission limitation through emission tests performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

Emission Limitations:

PE shall not exceed 3.5 tons per year;
PM10 emissions shall not exceed 3.5 tons per year;
SO2 emissions shall not exceed 3.7 tons per year;
NOx emissions shall not exceed 13.4 tons per year;
CO emissions shall not exceed 67 tons per year;
VOC emissions shall not exceed 4.2 tons per year; and
HCl emissions shall not exceed 2.6 tons per year.

Applicable Compliance Method:



Compliance with the annual NO_x, CO, VOC, PE/PM₁₀, and SO₂ emission limitations specified above shall be determined by the record keeping requirements specified in Section C.2.

Emissions Limitation:

Visible PE from the flare shall not exceed 10 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9.

- (2) The permittee has conducted initial emission testing for this emissions unit in accordance with the following requirements:
 - a. Emission testing shall be conducted within 90 days of commencing operation of the gas collection system and enclosed flare (initial performance testing was conducted June 4, 1998).
 - b. Emission testing shall be conducted to demonstrate compliance with the CO emission limits, HCl emission limits, VOC emission limits, and the NMOC control efficiency requirement.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for carbon monoxide, Method 10 of 40 CFR Part 60, Appendix A; for hydrogen chloride, Method 26 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.
 - d. The following test method shall be employed to demonstrate compliance with the VOC emission limit and NMOC control efficiency: Method 25C or 18 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.
 - e. Tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit 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 Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).



Personnel from the Southwest Ohio Air Quality 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 unit and the testing procedures provide a valid characterization of the emissions from the emissions unit 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 Southwest Ohio Air Quality 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 Southwest Ohio Air Quality Agency.

- g) Miscellaneous Requirements
 - (1) None.