



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:

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

06/10/08

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77
permit**

15-76-18-1541
American Landfill Inc
Chad Able
7916 Chapel Street, SE
Waynesberg, OH 44688

Dear Chad Able:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Canton Division of Air Pollution Control within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Canton Division of Air Pollution Control.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Canton Division of Air Pollution Control
Pennsylvania
West Virginia



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/10/08	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 15-76-18-1541 to:
 American Landfill Inc
 7916 Chapel Street, S.E.
 Sandy Township, Stark County, OH 44688

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

F001 (Paved and Unpaved Roadways and parking areas) Fugitive dust from vehicle traffic on landfill roadways and parking areas	P902 (MSW Landfill) Land disposal of municipal solid waste (including asbestos) and destruction of NMOC in MSW landfill gas
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You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Canton Division of Air Pollution Control
 420 Market Avnue N.
 Canton, OH 44702-1544
 (330) 489-3385

Ohio Environmental Protection Agency

Chris Korleski
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided

in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written 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.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office

or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- iv. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. 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, reopening 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed

under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

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

5. Permit Transfers

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
2. The following insignificant emissions unit is located at this facility:

G001 - gasoline and diesel dispensing facility (PTI 15-744)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - leachate storage tanks, 250,000 gal and one 8,000 gal condensate tank;
Z002 - solidification process;
Z004 - propane boiler, 1.2 MMBtu/hr;
Z005 - emissions from three (3) 3-inch pumps;
Z006 - emissions from three (3) 6-inch pumps;
Z007 - emissions from de-rimmer engine, 14-hp diesel engine;
Z009 - emissions from three (3) light plants, 15-hp diesel engine;
Z010 - used oil tank, 550 gal outside fueling area;
Z011 - gasoline tank, 550 gal outside fueling area;
Z012 - diesel tank, 4,000 gal outside fueling area;
Z013 - diesel tank, 6,000 gal outside fueling area
Z014 - gear oil tank, 275 gal in tank room;
Z015 - transmission oil tank, 550 gal in tank room;
Z016 - hydraulic oil 10-wt tank, 550 gal in tank room;
Z017 - hydraulic oil 46 tank, 275 gal in tank room;
Z018 - new lube oil tank, 550 gal in tank room;
Z019 - new lube oil tank, 550 gal.
2. The permittee shall not cause or allow any open burning in violation of OAC Chapter 3745-19 at this facility.
3. The permittee shall not initiate or allow any salvage operations to be conducted at this location without prior written approval of the Ohio EPA.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paved and Unpaved Roadways and parking areas (F001)

Activity Description: Fugitive dust from vehicle traffic on landfill roadways and parking areas

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Roadways and Parking Areas. This Title V Renewal incorporates the chapter 31 modification requirements of PTI 15-303 (F001) issued January 29, 1986 which is being superceded upon issuance of an administrative modification to correct the references in PTI 15-01601, for F001 and P902. See Section A.I.2.a.	OAC rule 3745-31-05(A)(3) (PTI 15-01601 issued 07/20/06)	Fugitive particulate emissions (PE) from all paved and unpaved roadways and parking areas shall not exceed 834 TPY Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust See A.I.2.d through A.I.2.o. below.
paved roadways and parking areas See A.I.2.b. below.	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-31-05(A)(3) (PTI 15-01601 issued 07/20/06)	See A.I.2.p. below. See A.I.2.p below. No visible particulate emissions except for one (1) minute during any 60-minute period for all paved roadways and parking areas.
unpaved roadways and parking areas See A.I.2.c. below.	OAC rule 3745-31-05(A)(3) (PTI 15-01601 issued 07/20/06)	No visible particulate emissions except for three (3) minutes during any 60-minute period for all unpaved roadways and parking areas.

2. Additional Terms and Conditions

2.a This emissions unit consists of the facility roadways and parking areas and the operation of vehicles on the facility roadways and parking areas. These vehicles include trucks associated with: (1) waste hauling; (2) trucks associated with the transporting of daily and intermediate cover materials; (3) trucks associated with the transporting of sand and gravel; and, (4) trucks associated with earthmoving. The emissions associated with this emissions unit do not include the emissions from the combustion of fuels in the engines of the trucks.

2.b The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways (for transporting materials obtained from off-site):

The section of Chapel Street S.E. which is west of State Route 44 and leads to the facility, and, the section of paved roadway which extends from the end of Chapel Street S.E. to the facility scales

paved parking areas:

Paved parking lots

2.c The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways (for transporting materials obtained from off-site and on-site):

All unpaved roadways

unpaved parking areas:

Unpaved parking lots

2.d The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water and vacuum-sweeping at sufficient treatment frequencies to ensure compliance and enforce a 25 mph posted speed limit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with watering and/or a dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.f The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to enforcing a 10 mph posted speed limit and committed to treating the unpaved roadways and parking areas with water spray and/or a dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.g The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area, that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2. Additional Terms and Conditions (continued)

- 2.h** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.i** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.j** Open-bodied vehicles transporting materials likely to become airborne as fugitive dust shall have such materials covered at all times after the vehicle reaches the scale house until the point of disposal if the control measure is necessary for the materials being transported.
- 2.k** The tires and bodies of all heavy-duty vehicles shall be washed with high pressure water prior to leaving the facility to minimize the carryover of dust or mud to public roadways. This washing shall not be required in freezing weather.
- 2.l** If dust or mud is carried onto the public roadways, it shall be removed, at the latest, by the end of the working day.
- 2.m** This facility shall not remove a paved roadway or parking area and replace it with an unpaved roadway or parking area.
- 2.n** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- 2.o** The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of Ohio Administrative Code (OAC) rule 3745-15-07.
- 2.p** There are no applicable emission limitations/control measures from OAC rules 3745-17-08(B) and 3745-17-07(B) because the facility is not located in an Appendix A area as specified in OAC rule 3745-17-08.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- 1.** Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas, in accordance with the following frequencies:

paved roadways/ parking areas	minimum inspection frequency
Paved roadways and parking areas	daily
unpaved roadways/ parking areas	minimum inspection frequency
Unpaved roadways and parking areas as defined in section A.1.2.b.	daily
- 2.** The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic/operating conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed during the next inspection pursuant to the minimum inspection frequency.

III. Monitoring and/or Record Keeping Requirements (continued)

- 3.** The permittee shall maintain records of information concerning inspections and control measures.
- 3.a** The permittee shall maintain daily records of the following information:
 - i. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - ii. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures; and
 - iii. the dates the control measures were implemented.

This information shall be kept separately for the paved roadways and parking areas and for the unpaved roadways and parking areas.

- 3.b** The permittee shall maintain quarterly records of the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures. This record shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- 4.** The permittee shall maintain semi-annual records of (1) the distance in yards that a typical vehicle will travel on the permittee's paved roadways and parking areas in one round trip and (2) the distance in yards that a typical vehicle will travel on the permittee's unpaved roadways and parking areas in one round trip for purposes of calculating actual annual particulate emissions. The records shall be maintained individually for each of the four purposes that trucks serve when traveling on the permittee's roadways and parking areas. These four purposes are: waste hauling, transporting of daily and intermediate cover materials, transporting of sand and gravel, and transporting of earth. The distance records for the paved roadways and parking areas shall be recorded to the nearest 10 yards. The distance records for the unpaved roadways and parking areas shall be recorded to the nearest 150 yards.

IV. Reporting Requirements

- 1.** The permittee shall submit deviation reports that identify any of the following occurrences:
 - 1.a** each day during which an inspection was not performed by the required frequency, excluding an inspection that was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - 1.b** each instance when a control measure that was to be implemented as a result of an inspection was not implemented.
- 2.** The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions.
- 3.** The permittee shall submit annual reports that include the annual PE emission rate. These reports shall be submitted by April 15 of each year. These reporting requirements may be satisfied by including and identifying the annual operating hours and specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

No visible emissions except for one (1) minute during any 60-minute period, for paved roadways and parking areas

No visible emissions except for three (3) minutes during any 60-minute period, for unpaved roadways and parking areas

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources", as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC Rule 3745-17-03.

No visible emission observations are specifically required to demonstrate compliance with the visible emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

1.b Emission Limitation:

Fugitive PE from all paved and unpaved roadways and parking areas shall not exceed 834 tons per year (TPY)

Applicable Compliance Method:

In summary, the maximum controlled emission rate (834 TPY) for paved/unpaved roadways and parking areas was calculated using a worst case calculation based upon all landfill roads being used to support the 15,000 tons per day (TPD) waste acceptance rate (Allowable Maximum Daily Waste Receipt, AMDWR), using a mean vehicle weight based upon vehicles used for a particular purpose using landfill roads, and the assumed control efficiencies.

Compliance shall be demonstrated by calculation of the annual fugitive emissions from the plant roadways and parking areas, total annual particulate emissions (TAPE), using the actual annual vehicle miles traveled (VMT) and comparing the calculated emissions with the emissions limitation.

V. Testing Requirements (continued)

Calculation of the uncontrolled PTAPE

The uncontrolled total annual particulate emissions from the paved roadways and parking areas is the uncontrolled PTAPE. It shall be calculated using Equation 2 in chapter 13.2.1 of AP-42, Compilation of Air Pollution Emissions Factors, Volume I: Stationary Point and Area Sources; Fifth Edition, (12/03) to obtain an uncontrolled emission factor with units of pounds of particulate emissions per vehicle mile traveled and multiplying this uncontrolled emission factor by the annual VMT on paved roadways and parking areas.

$$\text{Eq. 2: } E = k \times (sl/2) \exp 0.65 \times (W/3) \exp 1.5 \times (1 - P) / 4N$$

where E = Uncontrolled emission factor in units of lbs of particulate emitted per VMT

k = Particle size multiplier which is equal to 0.082

sl = Road surface silt loading in grams per square meter

W = Average weight in tons of the vehicles traveling the road

P = Number of days in the year with at least 0.01 inches of precipitation

N = Number of days in the averaging period

The permittee has selected a value of 7.4 grams per meter for "sl" which is the average value for "sl" for a Municipal Solid Waste Landfill from Table 13.2.1- 4 of AP-42. If a value of "sl" becomes available which is more representative of the actual landfills soils, the permittee shall use the more representative value in the calculation. A separate value of "W" shall be calculated for each group of trucks which perform one of the four functions at the landfill (section A.I.2.a). The permittee shall calculate the value of "W" based on the best historical truck usage data available from this facility. The value of "P" which was selected is 140 days from Table 13.2.1- 2 of the same section of AP-42. If a new version of section 13.2.1 is published by USEPA with a new Table 13.2.1- 2, the new value of "P" shall be used in the calculation. The value of "N" used is the number of days the facility was open in the year.

The maximum annual VMT shall be calculated for each four values of "W" noted above, the VMTW. For each value of "W", mileages shall be calculated utilizing the semi-annual records of the distance a typical truck will travel in one round trip from section A.III.4 above and the best available information for the actual number of trucks that traveled that distance and summed to obtain the maximum annual VMTW. The four values of the maximum annual VMTW shall be summed to obtain the maximum annual VMT for the paved roadways and parking areas.

Calculation of the uncontrolled UTAPE

The uncontrolled total annual particulate emissions from the unpaved roadways and parking areas is the uncontrolled UTAPE. The uncontrolled UTAPE shall be calculated using Equation 2 in chapter 13.2.2 of AP-42, Compilation of Air Pollution Emissions Factors, Volume I: Stationary Point and Area Sources; Fifth Edition, (12/03) to obtain an uncontrolled emission factor with units of pounds of particulate emissions per vehicle mile traveled and multiplying this uncontrolled emission factor by the annual VMT on unpaved roadways and parking areas.

$$\text{Eq. 2: } E = k \times (s/12) \exp 0.7 \times (W/3) \exp 0.45 \times (1 - P) / 4N$$

where E = Uncontrolled emission factor in units of lbs of particulate emitted per VMT

k = Particle size multiplier which is equal to 4.9

s = Surface material silt content, percentage

W = Average weight in tons of the vehicles traveling the road

P = Number of days in the year with at least 0.01 inches of precipitation

N = Number of days in the averaging period

V. Testing Requirements (continued)

The permittee has selected a value of 6.4% for "s" which is the average value for "s" for a Municipal Solid Waste Landfill from Table 13.2.2 - 1 of AP - 42. If a value of "s" becomes available which is more representative of the actual landfills soils, the permittee shall use the more representative value in the calculation. A separate value of "W" shall be calculated for each group of trucks which perform one of the four functions at the landfill (section A.I.2.a). The permittee shall calculate the value of "W" based on the best historical truck usage data available from this facility. The value of "P" which was selected is 140 days from Figure 13.2.2 - 1 of the same section of AP - 42. If a new version of section 13.2.2 is published by USEPA with a new Figure 13.2.2 - 1, the new value of "P" shall be used in the calculation. The value of "N" used is the number of days the facility will be open in the year.

The maximum annual VMT shall be calculated for each four values of "W" noted above, the VMTW. For each value of "W", mileages shall be calculated utilizing the semi-annual records of the distance a typical truck will travel in one round trip from section A.III.4 above and the best available information for the actual number of trucks that traveled that distance and summed to obtain the maximum annual VMTW. The four values of the maximum annual VMTW shall be summed to obtain the maximum annual VMT for the unpaved roadways and parking areas.

1.c Calculation of the total annual particulate emissions (TAPE)

TAPE, in tons, is equal to the sum of the total annual particulate emissions from the paved roadways and parking areas (PTAPE) in tons plus the total annual particulate emissions from the unpaved roadways and parking areas (UTAPE) in tons.

$$\text{TAPE} = \text{PTAPE} + \text{UTAPE}$$

$$\text{PTAPE} = (\text{uncontrolled PTAPE}) \times (1 - \text{fractional control efficiency})$$

$$\text{UTAPE} = (\text{uncontrolled UTAPE}) \times (1 - \text{fractional control efficiency})$$

The fractional control efficiency of all the control methods used on the paved roadways and parking areas is assumed to be 0.85.

The fractional control efficiency of all the control measures used on the unpaved roadways and parking areas is assumed to be 0.85.

$$\text{TAPE} = 0.15 \times (\text{PTAPE} + \text{UTAPE})$$

If the calculated value of TAPE is less than or equal to 834 tons, compliance will be shown.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: MSW Landfill (P902)

Activity Description: Land disposal of municipal solid waste (including asbestos) and destruction of NMOC in MSW landfill gas

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P902 - MSW landfill operations with asbestos disposal.	OAC rule 3745-31-05(A)(3) PTI 15-01601 issued 07/20/06.	Fugitive emissions of non-methane organic compounds (NMOC) shall not exceed 167.0 TPY
This Title V Renewal incorporates the Chapter 31 modification of PTI 15-303 (F002) issued January 29, 1986, PTI 15-991 (F004) issued February 18, 1993 and PTI 15-1244 (P001 and P901) issued December 24, 1996; all of which are superceded upon issuance of an administrative modification to correct the references in PTI 15-01601, for F001 and P902.		Fugitive emissions of methane (CH4) shall not exceed 26,057 TPY
		Fugitive emissions of volatile organic compounds (VOC) shall not exceed 65.0 TPY.
		Fugitive emissions of hazardous air pollutants (HAP) shall not exceed 23.71 TPY.
See Section A.I.2.a. for additional information.		Fugitive particulate emissions (PE) from the MSW landfill operations shall not exceed 1.64 tons per year.
		Visible fugitive PE from non-asbestos operations shall not exceed 10 percent opacity as a six-minute average.
		Best available control measures shall be used for non-asbestos operations that are sufficient to minimize or eliminate visible emissions of fugitive dust.
		See A.I.2.w. through A.I.2.z. below.
		The requirements established pursuant to this rule are equivalent to the requirements of OAC Chapter 3745-20; 40CFR Part 61, Subparts A and M; 40 CFR Part 60, Subpart WWW; 40 CFR Part 63, Subpart AAAA and OAC Chapter 3745-19.

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

Control Device(s) Emissions
 This Title V Renewal incorporates the Chapter 31 Modification to PTI 15-1244 (P001) issued December 24, 1996; which is superceded upon the issuance of an administrative modification to PTI 15-01601.

See Section A.I.2.a for additional information.

OAC rule 3745-20, 40 CFR Part 61, Subpart A and W
 40 CFR Part 60 Subpart WWW
 40 CFR Part 63, Subpart AAAA
 OAC rule 3745-17-07(B)(1)
 OAC rule 3745-17-08(B)
 OAC rule 3745-19
 OAC rule 3745-31-05(A)(3)
 PTI 15-01601 issued 07/20/06.

See A.I.2.a through A.I.2.i below.
 See A.I.2. j through A.I.2.t and Part II.A.3 through 11 below.
 See A.I.2.v.below.
 See A.I.2.v. below.
 See A.II.2 below.
 Emissions from the control devices(s) shall not exceed the following:
 7.6 lbs of PM10/hour and 33.5 tons of PM10/year
 53.7 lbs of CO/hour and 235.3 tons of CO/year
 11.2 lbs of NOx/hour and 49.2 tons of NOx/year
 7.2 lbs of SO2/hour and 31.4 tons of SO2/year
 2.3 lbs of NMOC/hour and 10.1 tons of NMOC/year
 0.9 lbs of VOC/hour and 4.0 tons of VOC/year
 3.5 lb of HCl/hour and 15.2 tons of HCl/year
 See Section II.10 below.

2. Additional Terms and Conditions

- 2.a** i. This Title V Renewal deleted emissions units Material Handling (F002), Storage Piles (F004) and MSW Landfill Flare #1 (P001) that were replaced by implementing applicable requirements for emissions unit MSW Landfill Operations (P902) in accordance with PTI 15-01601 and Solid Waste PTI 02-12954. The main modifications include:
- (a). increase the design capacity of the landfill to approximately 124,000,000 cubic yards;
 - (b). establish a particulate emissions (PE) annual allowable emissions limitation;
 - (c). revise emissions limits associated with fugitive landfill gas emissions;
 - (d). the permit allows the facility to install control device(s) in the future as the landfill gas generation increases; and
 - (e). to limit the volume of landfill gas fed to the flare to 2,226 million scf per year and to incorporate the open flare emissions into the landfill emissions unit.
- ii. The landfill gas generated on the facility and captured and collected by the facility's landfill gas collection and control system is currently being routed to an on-site gas treatment system owned and operated by Toro Energy, LLC that processes the collected gas for subsequent use as pipeline quality gas. Currently, the landfill gas flare functions a back up control system which is only used when the off-site gas treatment system is not operating properly or if the off-site gas treatment system is taken off-line for maintenance.
- 2.b** [OAC 3745-20-06 (B)(1)]
 There shall be no visible emissions from asbestos-containing materials during on-site transportation, transfer, unloading, deposition or compacting operations.

2. Additional Terms and Conditions (continued)

- 2.c** [OAC 3745-20-06 (B)(2)]
Deposition and burial operations shall be conducted in a careful manner that prevents asbestos-containing materials from being broken up or dispersed before the materials are buried.
- 2.d** [OAC 3745-20-06 (B)(4)]
During the unloading, deposition, burial and initial compaction of asbestos-containing waste materials, the owner or operator of the active waste disposal site shall establish a restricted area adequate to deter the unauthorized entry of the general public and any unauthorized personnel from any location within one hundred feet of the operations.
- 2.e** [OAC 3745-20-06 (B)(5)]
A hazard warning shall be displayed on signs not less than 20 x 14 inches in size, posted so they are visible before entering an area with asbestos waste disposal operations in progress; or, alternatively, mark vehicles used to transport asbestos-containing waste materials with 20 x 14 inch signs so that the signs are displayed in such a manner and location that a person can easily read the legend. Display the following legend in the lower panel with letter sizes and styles of a visibility at least equal to those specified in this paragraph.

Legend:

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

Notation:

2.5 cm (1 inch) Sans Serif, Gothic or Block (lines # 1 - 2, above)
1.9 cm (¾ inch) Sans Serif, Gothic or Block (line # 3 above)
14 Point Gothic

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

- 2.f** The permittee shall cover and compact asbestos wastes in accordance with the following:
- i. [OAC 3745-20-06 (B)(3)]
As soon as practical after the placement of friable asbestos, but no later than the end of each working day, the asbestos-containing waste materials deposited at the site during the operating day shall be covered with at least 12 inches of non-asbestos-containing materials. Once the asbestos-containing materials are covered, the area may be compacted.
 - ii. [OAC 3745-31-05(A)(3)]
Care shall be taken to ensure that disposed asbestos shall not be re-excavated in subsequent operations. Any accidentally exposed material shall be immediately recovered in accordance with the provisions of condition (d)(i) above.
- 2.g** [OAC 3745-31-05(A)(3)]
The permittee shall implement and maintain an "Asbestos Disposal Operating Procedure and Spill Contingency Plan" ("Plan") consisting of: authorized personnel training, inspection and disposal operating procedures, non-conforming load response procedures, inventory and maintenance procedures for safety and emissions control equipment, record keeping procedures, and emergency notification procedures. Authorized personnel shall be knowledgeable in the procedures, and the Plan shall be available for inspection at this facility at all times.
- 2.h** [OAC 3745-31-05(A)(3)]
Emissions control equipment shall be available for wetting and containing asbestos in the event of a release or non-conforming load disposal. All equipment required to implement the Plan shall be maintained in accordance with good engineering practices to ensure that the equipment is in a ready-to-use condition and in an appropriate location for use.

2. Additional Terms and Conditions (continued)

- 2.i** OAC 3745-20-06 (E)
If this emissions unit is permanently closed, the permittee shall comply with all of the applicable provisions of OAC rule 3745-20-07.
- 2.j** The requirements of 40 CFR, Part 63, Subpart AAAA also include compliance with the requirements of 40 CFR, Part 60, Subpart WWW.
- 2.k** [40 CFR 60.752(b)(2)(ii)(A)]
The calculated NMOC emission rate for this facility is greater than 50 megagrams per year (Mg/yr), therefore the permittee shall operate a collection and control system that captures the gas generated within the landfill as required below. The active collection system shall satisfy the following requirements:
- i. The system shall be designed to handle the maximum expected gas 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. The system shall collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active, or 2 years or more if closed or at final grade.
 - iii. The system shall collect gas at a sufficient extraction rate.
 - iv. The system shall be designed to minimize off-site migration of subsurface gas.
- 2.l** [40 CFR 60.752(b)(2)(i)(C)]
If the permittee seeks to demonstrate compliance with A.I.2.k. through the use of a collection system not conforming to the specifications provided in A.I.2.o. through A.I.2.q., the permittee shall provide information satisfactory to the Canton City Health Department, Air Pollution Control Division to demonstrate that off-site migration is being controlled.
- 2.m** [40 CFR 60.752(b)(2)(i)(A, B and D)]
The design plan required in this section has been submitted to the Canton City Health Department, Air Pollution Control Division. The design plan included appropriate alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions of Sections 60.753 through 60.758 proposed by the permittee. The collection and control system design plan conforms with specifications for active collection systems in 60.759 and is approved.
- Many site-specific factors must be taken into consideration in landfill gas system design and alternative systems may be necessary. Therefore, the permittee must notify the Canton City Health Department, Air Pollution Control Division when an alternative design is determined to be necessary to meet the requirements of this section.
- 2.n** 40 CFR 60.755(b)]
The permittee shall place each well or design component as specified in the approved design plan. Each well shall be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of 5 years or more if active; or 2 years or more if closed or at final grade.

2. Additional Terms and Conditions (continued)

2.o [40 CFR 60.759(a)]

The permittee shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas using the following procedures unless alternative procedures have been approved by the Director:

i. [40 CFR 60.759(a)(1)]

The collection devices within the interior and along the perimeter areas shall be certified to achieve comprehensive control of surface gas emissions by a professional engineer. The following issues shall be addressed in the design: depths of refuse, refuse gas generation rates and flow characteristics, cover properties, gas system expandability, leachate and condensate management, accessibility, compatibility with filling operations, integration with closure end use, air intrusion control, corrosion resistance, fill settlement, and resistance to the refuse decomposition heat.

ii. [40 CFR 60.759(a)(2)]

The sufficient density of gas collection devices determined in A.I.2.o.i shall address landfill gas migration issues and augmentation of the collection system through the use of active or passive systems at the landfill perimeter or exterior.

2.p [40 CFR 60.759(a)(3)]

The placement of gas collection devices shall control all gas producing areas, except as provided by i and ii below:

i. [40 CFR 60.759(a)(1)(i)]

Any segregated area of non-degradable material may be excluded from collection if documented as provided under A.III.15. The documentation shall provide the nature, date of deposition, location and amount of non-degradable material deposited in the area, and shall be provided to the Canton City Health Department, Air Pollution Control Division and Director upon request.

ii. [40 CFR 60.759(a)(1)(ii)]

Any non-productive area of the landfill may be excluded from control, provided that the total of all excluded areas can be shown to contribute less than 1% of the total amount of NMOC emissions from the landfill. The amount, location, and age of the material shall be documented and provided to the Canton City Health Department, Air Pollution Control Division and Director upon request. A separate NMOC emissions estimate shall be made for each section proposed for exclusion, and the sum of all such sections shall be compared to the NMOC emissions estimate for the entire landfill.

Emissions from each section shall be computed using the following equation:

$$Q_i = 2 \times k \times L_o \times M_i \times (e^{-kt_i} \times C_{nmoc}) \times (3.6 \times 10^{-9})$$

2. Additional Terms and Conditions (continued)

where:

Q_i = NMOC emission rate from the i th section, in megagrams per year

k = methane generation rate constant, in year⁻¹

L_0 = methane generation potential, in cubic meters per megagram solid waste

M_i = mass of the degradable solid waste in the i th section, in megagram

t_i = age of the solid waste in the i th section, in years

C_{nmoc} = concentration of nonmethane organic compounds, in parts per million by volume

3.6×10^{-9} = conversion factor

iii. [40 CFR 60.759(a)(1)(iii)]

The values for k , L_0 , and C_{nmoc} determined in field testing shall be used, if field testing has been performed in determining the NMOC emission rate or the radii of influence. If field testing has not been performed, the default values for k , L_0 and C_{nmoc} are provided below:

$k^* = 0.05$ per year

$L_0 = 170$ cubic meters per megagram

$C_{nmoc} = 4,000$ parts per million by volume as hexane

* For landfills located in geographical areas with a thirty-year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year.

2.q

iii. [40 CFR 60.759(b)(3)]

Collection devices may be connected to the collection header pipes below or above the landfill surface. The connector assembly shall include a positive closing throttle valve, any necessary seals and couplings, access couplings and at least one sampling port. The collection devices shall be constructed of PVC, HDPE, fiberglass, stainless steel, or other nonporous material of suitable thickness.

[40 CFR 60.759(b)]

When the permittee constructs new gas collection devices, the permittee shall use the following equipment or procedures:

i. [40 CFR 60.759(b)(1)]

The landfill gas extraction components shall be constructed of polyvinyl chloride (PVC), high density polyethylene (HDPE) pipe, fiberglass, stainless steel, or other nonporous corrosion resistant material of suitable dimensions to: convey projected amounts of gases; withstand installation, static, and settlement forces; and withstand planned overburden or traffic loads. The collection system shall extend as necessary to comply with emission and migration standards. Collection devices such as wells and horizontal collectors shall be perforated to allow gas entry without head loss sufficient to impair performance across the intended extent of control. Perforations shall be situated with regard to the need to prevent excessive air infiltration.

ii. [40 CFR 60.759(b)(2)]

Vertical wells shall be placed so as not to endanger underlying liners and shall address the occurrence of water within the landfill. Holes and trenches constructed for piped wells and horizontal collectors shall be of sufficient cross-section so as to allow for their proper construction and completion including, for example, centering of pipes and placement of gravel backfill. Collection devices shall be designed so as not to allow indirect short circuiting of air into the cover or refuse into the collection system or gas into the air. Any gravel used around pipe perforations should be of a dimension so as not to penetrate or block perforations.

2. Additional Terms and Conditions (continued)

2.r [40 CFR 60.752(b)(2)(v)]

The collection and control system may be capped or removed provided that all of the following conditions are met:

- i. The landfill shall be a closed landfill as defined in 40 CFR 60.751. A closure report shall be submitted to the Canton City Health Department, Air Pollution Control Division as provided in 40 CFR 60.757(d);
- ii. The collection and control system shall have been in operation a minimum of 15 years.
- iii. Following the procedures specified in 40 CFR 60.754(b), the calculated NMOC gas produced by the landfill shall be less than 50 megagrams per year (55.1 TPY) on 3 successive test dates. The test dates shall be no less than 90 days apart, and no more than 180 days apart.

2.s [40 CFR 60.752(b)(2)(v)(A)]

If this emissions unit is permanently closed, a closure notification, as provided for in 40 CFR Part 60.757(d), shall be submitted to the Canton City Health Department, Air Pollution Control Division.

2.t [40 CFR 60.752(b)(2)(iii)]

The collected gas shall be routed to a control system that complies with one of the following options:

- i. [40 CFR 60.752(b)(2)(iii)(A), 40 CFR 60.18(c)]
an open flare designed and operated as follows:

- (a). the flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes, during any 2 consecutive hours;
- (b). the flare shall be operated with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f); and
- (c) The permittee shall comply with either the requirements in sections A.I.2.t.i.(c).(i) and A.I.2.t.i.(c).(ii) or the requirements in section A.I.2.t.i.(c).(iii):
 - (i). Flares shall be used only with the net heating value of the gas being combusted being 11.2MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted, or with the net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater if the flare is non-assisted. The net heating value of the gas being combusted shall be determined as follows or by utilizing methods approved by the Canton City Health Department, Air Pollution Control Division in accordance with 40 CFR Part 60, Subpart WWW:

$H_t = k \times (\text{the summation of } C_i H_i \text{ for } i=1 \text{ through } i=n)$

where:

H_t = net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 degrees C and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 degrees C;

k = constant, 1.740×10 to the minus seven degree (1/ppm)(g mole/scm) (MJ/kcal) where the standard temperature for (g mole/scm) is 20 degrees C;

C_i = concentration of sample component i in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-77; and

H_i = net heat of combustion of sample component i , kcal/g mole at 25 degrees C and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 (incorporated by reference as specified in 40 CFR 60.17) if published values are not available or cannot be calculated.

2. Additional Terms and Conditions (continued)

(ii). A steam-assisted and non-assisted flare shall be designed for and operated with an exit velocity of less than 18.3 m/sec. (60 ft/sec), except:

[a]. steam-assisted and non-assisted flare shall be designed for and operated with an exit velocity of equal to or greater than 18.3 m/sec. (60 ft/sec), but less than 122 m/sec (400 ft/sec) are allowed if the net heating value of the gas being combusted is greater than 37.3 MJ/scm (1,000 Btu/scf); and

[b]. steam-assisted and non-assisted flare shall be designed for and operated with an exit velocity of less than the velocity, V_{max} , and less than 122 m/sec (400 ft/sec) are allowed, as determined by $\text{Log}_{10}(V_{max}) = (Ht + 28.8)/31.7$ where:

V_{max} = maximum permitted velocity, M/sec;

28.8 = constant;

31.7 = constant; and

Ht = the net heating value as determined in section A.I.2.t.i.(c).(i). above.

(iii). Flares shall be used that have a diameter of 3 inches or greater, are nonassisted, have a hydrogen content of 8.0 percent (by volume) or greater, and are designed for and operated with an exit velocity less than 37.2 m/sec (122 ft/sec) and less than the velocity, V_{max} , as determined by the following equation:

$$V_{max} = (Xh^2 - K1) * K2$$

where:

V_{max} = maximum permitted velocity, m/sec;

K1 = constant, 6.0 volume-percent hydrogen;

K2 = constant, 3.9 (m/sec)/volume-percent hydrogen; and

Xh² = the volume-percent of hydrogen, on a wet basis, as calculated by using the American Society for Testing and Materials (ASTM) Method D1946-77, or utilizing methods approved by the Canton City Health Department, Air Pollution Control Division in accordance with 40 CFR Part 60, Subpart WWW.

(iv). Air-assisted flare shall be designed for and operated with an exit velocity of less than the velocity, V_{max} , as determined by the following equation:

$$V_{max} = 8.706 + 0.7084 (Ht)$$

where:

V_{max} = maximum permitted velocity, m/sec;

8.706 = constant;

0.7084 = constant; and

Ht = the net heating value as determined in section A.I.2.t.i.(c).(i). above.

ii. [40 CFR 60.752(b)(2)(iii)(B)]

A control system designed and operated to reduce NMOC by 98 weight-percent, or, when an enclosed combustion device is used for control, to either reduce NMOC by 98 weight percent or reduce the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen. The reduction efficiency or parts per million by volume shall be established by an initial performance test to be completed no later than 180 days after the initial startup of the approved control system using the test methods specified in 60.754(d) (See section V below).

(a). If a boiler or process heater is used as the control device, the landfill gas stream shall be introduced into the flame zone.

(b). The control device shall be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in 40 CFR 60.756;

iii. [40 CFR 60.752(b)(2)(iii)(C)]

Route the collected gas to a treatment system that processes the collected gas for subsequent sale or use. All emissions from any atmospheric vent from the gas treatment system shall be subject to the requirements of paragraph (b)(2)(iii) (A) or (B) of this section.

2. Additional Terms and Conditions (continued)

- 2.u** The emission limitations for the control device(s) has (have) been established based upon the landfill's potential to emit as predicted by USEPA's Landfill gas estimation program (LANDGEM), AP-42 emission factors, and standard industry assumptions. These maximum emissions are expected to occur after the year 2016 if the facility were to accept its authorized maximum daily waste each day. The facility is currently sending all landfill gas off-site to a treatment facility which processes the landfill gas and prepares it for subsequent sale. Alternate control device(s) is (are) being permitted as a back-up control method in the event that the off-site processing plant is inoperable. Based upon the above, the facility has committed to the following:
- i. The facility shall install additional control device(s), as necessary, to maintain compliance with the requirements in 40 CFR 60.752(b)(2)(iii) and the emission limitations contained in Part III, A.I.1. This will be accomplished by selecting and installing new replacement and/or additional control device(s) when the capacity of the current control method(s)/device(s) will no longer control the volume of gas emitted by the landfill.
 - ii. The selected control device(s) must be capable of demonstrating compliance based upon the calculations contained in Part III.A.V. of this permit.
- 2.v** There are no applicable emission limitations/control measures from OAC rules 3745-17-08(B) and 3745-17-07(B) because the facility is not located in an Appendix A area as specified in OAC rule 3745-17-08.
- 2.w** [OAC 3745-31-05(A)(3)]
The permittee shall ensure that solid wastes are deposited, spread, and compacted in such a manner as to minimize or prevent visible emissions of dust. All truckloads of solid waste shall be unloaded in a manner which will minimize the drop height of the solid wastes. Any dusty construction materials, soils or wastes likely to become airborne shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate visible emissions of fugitive dust. Watering shall be conducted in such a manner as to avoid the pooling of liquids and runoff. No dusty material shall be dumped during periods of high wind speed, unless the material has been treated to prevent fugitive dust emissions from becoming airborne.
- 2.x** i. The non-asbestos material handling activities that are covered by this permit and subject to the above-mentioned annual fugitive mass PE limitation and the visible fugitive PE limitation for non-asbestos operations are listed below:
- waste handling (depositing, spreading, and compacting)
landfill daily and intermediate cover handling
wind erosion from landfill surfaces
general earthmoving and soil handling during landfill construction
landfill aggregate handling during landfill construction.
- ii. The asbestos-containing material handling activities that are covered by this permit and subject to the above-mentioned visible fugitive PE limitation for asbestos-containing materials operations are listed below:
- on-site transportation, transfer, unloading, deposition, and compacting operations of asbestos-containing materials.
- 2.y** [OAC 3745-31-05(A)(3)]
The permittee shall employ best available control measures on all activities listed in 2.w. and 2.x. for the purpose of ensuring compliance with the above-mentioned applicable requirements (particulate emission limitations). In accordance with the permittee's permit application, the permittee has committed to covering the active storage piles or spraying them with water or a surfactant solution as necessary to control fugitive dust. Also in accordance with the permittee's permit application, the permittee has committed to covering the inactive storage piles with vegetation or another type of cover or spraying them with water or a surfactant solution as necessary to control fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2. Additional Terms and Conditions (continued)

2.z [OAC 3745-31-05(A)(3)]

The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary if there is snow and/or ice cover or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements (particulate emission limitations). Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.zz [OAC 3745-31-05(A)(3)]

Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

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

ii. The permittee shall employ control measures, including the application of best available technology (BAT), for the purpose of ensuring compliance with OAC rule 3745-15-07.

II. Operational Restrictions

1. [OAC 3745-31-05(A)(3)]

The permittee shall be limited to accepting for disposal no more than 4,605,000 tons of waste material per calendar year.

2. There shall be no open burning in violation of OAC Rule 3745-19 at this facility.

3. [40 CFR 60.753(a)]

The permittee shall operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for:

- a. 5 years or more if active; or
- b. 2 years or more if closed or at final grade.

4. [40 CFR 60.753(b)]

The permittee shall operate the collection system with negative pressure at each wellhead except under the following conditions:

- a. A fire or increased well temperature. The owner or operator shall record instances when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the annual reports as provided in 40 CFR 60.757(f)(1);
- b. Use of a geomembrane or synthetic cover. The permittee shall develop acceptable pressure limits in the design plan; and
- c. A decommissioned well. A well may experience a static positive pressure after the shutdown to accommodate for declining flows. All design changes shall be approved by the Canton City Health Department, Air Pollution Control Division.

II. Operational Restrictions (continued)

5. [40 CFR 60.753(c)]

The permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees C and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

a. The nitrogen level shall be determined using Method 3C, unless an alternative test method is established as allowed by 60.752(b)(2)(i).

b. Unless an alternative test method is established as allowed by 60.752(b)(2)(i), the oxygen shall be determined by an oxygen meter using Method 3A except that:

i. The span shall be set so that the regulatory limit is between 20 and 50 percent of the span;

ii. A data recorder is not required;

iii. Only two calibration gases are required, a zero and span, and ambient air may be used as the span;

iv. A calibration error check is not required;

v. The allowable sample bias, zero drift, and calibration drift are ± 10 percent.

6. [40 CFR 60.753(d)]

The permittee shall operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the owner or operator shall conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The owner or operator may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan shall be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30 meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.[40 CFR 60.753(e)]

The permittee shall operate the system such that all collected gases are vented to a control system designed and operated in compliance with 40 CFR 60.752(b)(2)(iii) unless the collected gas is routed to a treatment system that processes the collected gas for subsequent sale. In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour.

7. [40 CFR 60.753(e)]

The permittee shall operate the system such that all collected gases are vented to a control system designed and operated in compliance with 40 CFR 60.752(b)(2)(iii) unless the collected gas is routed to a treatment system that processes the collected gas for subsequent sale. In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour.

8. [40 CFR 60.753(f)]

The permittee shall operate the control or treatment system at all times when the collected gas is routed to the system.

9. [40 CFR 60.753(g)]

If monitoring demonstrates that the operational requirements in sections A.II.4, A.II.5, or A.II.6 of this section are not met, corrective action shall be taken as specified in 40 CFR 60.755(a)(3) through (5) or 40 CFR 60.755(c) of this subpart (See section V.1.c through f. and V.2 through V.3 of this permit). If corrective actions are taken as specified in 40 CFR 60.755, the monitored exceedance is not a violation of the operational requirements in this section.

II. Operational Restrictions (continued)

10. [OAC 3745-31-05(A)(3)]
The facility's current open flare shall be limited to inputting less than or equal to 2,226 million scf of landfill gas per year. The permittee shall demonstrate compliance upon PTI issuance by using past records of monthly landfill gas input rates. Upon replacement of the current open flare, the permittee shall comply with condition A.1.2.u above.
11. [40 CFR 60.755(e)]
The provisions of Subpart WWW apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction shall not exceed 5 days for collection systems and shall not exceed 1 hour for treatment or control devices.

III. Monitoring and/or Record Keeping Requirements

1. [OAC 3745-31-05(A)(3)]
The permittee shall inspect each load of asbestos-containing material delivered to the facility. The inspection shall consist of a visual examination to ensure that each shipment of asbestos-containing materials is received in intact, leak-tight containers labeled with appropriate hazard warning labels, the name of the waste generator, and the location of waste generation. The inspection also shall determine whether the waste shipment records accompany the consignment and accurately describe the waste material and quantity.

If, on the basis of the inspection, the waste material is found to be improperly received, the load shall be disposed of in accordance with the procedures in the "Asbestos Spill Contingency Plan," and the discrepancy shall be noted on the waste shipment records.
2. [OAC 3745-20-06(C)]
The permittee shall maintain records of the following information:
 - a. the waste shipment record form for each shipment of asbestos-containing materials; and
 - b. the location, depth and area, and quantity in cubic yards of all asbestos-containing materials within the disposal site, on a map or a diagram of the disposal area.
3. [40 CFR 60.758(a)]
Except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator of an MSW landfill subject to the provisions of 40 CFR 60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report which triggered 40 CFR 60.752(b), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.
4. [40 CFR 60.756(a)]
Except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator seeking to comply with 40 CFR 60.752(b)(2)(ii)(A) for an active gas collection system shall install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and:
 - a. Measure the gauge pressure in the gas collection header (at each wellhead) on a monthly basis as provided in 40 CFR 60.755(a)(3);
 - b. Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis as provided in 40 CFR 60.755(a)(5); and
 - c. Monitor temperature of the landfill gas on a monthly basis as provided in 40 CFR 60.755(a)(5).
5. [40 CFR 60.756(b)]
Each owner or operator seeking to comply with 60.752(b)(2)(iii) using an enclosed combustor shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:
 - 5.a A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ± 1 percent of the temperature being measured expressed in degrees Celsius or ± 0.5 degrees Celsius, whichever is greater. A temperature monitoring device is not required for boilers or process heaters with design heat input capacity equal to or greater than 44 megawatts.

III. Monitoring and/or Record Keeping Requirements (continued)

- 5.b** A device that records flow to or bypass of the flare. The owner or operator shall either:
- i. Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or
 - ii. Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.
- 6.** [40 CFR 60.756(c)]
Each owner or operator seeking to comply with 60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:
- a. A heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.
 - b. A device that records flow to or bypass of the flare. The owner or operator shall either:
 - i. Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or
 - ii. Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.
- 7.** [40 CFR 60.756(f)]
Except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator seeking to demonstrate compliance with 40 CFR 60.755(c), shall monitor surface concentrations of methane according to the instrument specifications and procedures provided in 40 CFR 60.755(d). Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring.
- 8.** [40 CFR 60.758(b)(1) and (b)(4)]
Except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator of a controlled landfill shall keep up-to-date, readily accessible records, for the life of the control equipment, of the data listed in 8.a. below as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the control device vendor specifications shall be maintained until removal.
- 8.a** Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with 40 CFR 60.752(b)(2)(ii):
- i. The maximum expected gas generation flow rate as calculated in 40 CFR 60.755(a)(1) (See section A.V.). The owner or operator may use another method to determine the maximum gas generation flow rate, if the method has been approved by the Canton City Health Department, Air Pollution Control Division.
 - ii. The density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR 60.759(a)(1).
- 8.b** Where an owner or operator subject to the provisions of this subpart seeks to demonstrate compliance with 60.752(b)(2)(iii)(A) through use of an open flare, the flare type (i.e., steam-assisted, air-assisted, or nonassisted), all visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations made during the performance test as specified in 60.18; continuous records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the pilot flame of the flare flame is absent.

III. Monitoring and/or Record Keeping Requirements (continued)

- 9.** [40 CFR 60.758(c)(1) through (c)(4)]
Except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator of a controlled landfill subject to the provisions of this subpart shall keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in 40 CFR 60.756 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.
- 9.a** a. The following constitute exceedances that shall be recorded and reported under §§ 60.757(f):
- i. For enclosed combustors except for boilers and process heaters with design heat input capacity of 44 megawatts (150 million British thermal unit per hour) or greater, all 3-hour periods of operation during which the average combustion temperature was more than 28 degrees C below the average combustion temperature during the most recent performance test at which compliance with §§ 60.752(b)(2)(iii) was determined.
- ii. For boilers or process heaters, whenever there is a change in the location at which the vent stream is introduced into the flame zone as required under paragraph (b)(3) of this section.
- 9.b** Each owner or operator subject to the provisions of this subpart shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under 40 CFR 60.756.
- 9.c** Each owner or operator subject to the provisions of this subpart who uses a boiler or process heater with a design heat input capacity of 44 megawatts or greater to comply with §§ 60.752(b)(2)(iii) shall keep an up-to-date, readily accessible record of all periods of operation of the boiler or process heater. (Examples of such records could include records of steam use, fuel use, or monitoring data collected pursuant to other State, local, Tribal, or Federal regulatory requirements.)
- 9.d** Each owner or operator seeking to comply with the provisions of this subpart by use of an open flare shall keep up-to-date, readily accessible continuous records of the flame or flare pilot flame monitoring specified under 60.756(c), and up-to-date, readily accessible records of all periods of operation in which the flame or flare pilot flame is absent.
- 10.** [40 CFR 60.758(d)]
Except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator subject to the provisions of this subpart shall keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector.
- 10.a** Each owner or operator subject to the provisions of this subpart shall keep up-to-date, readily accessible records of the installation date and location of all newly installed collectors as specified under 40 CFR 60.755(b).
- 10.b** Each owner or operator subject to the provisions of this subpart shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in 40 CFR 60.759(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in 40 CFR 60.759(a)(3)(ii).
- 11.** [40 CFR 60.758(e)]
Except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator subject to the provisions of this subpart shall keep for at least 5 years up-to-date, readily accessible records of all collection and control system exceedances of the operational standards in 40 CFR 60.753, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.
- 12.** [OAC 3745-31-05(A)(3) and [40 CFR 60.756(c)]
This facility shall maintain monthly records of the amount of landfill gas, in scf, produced by the landfill, amount of landfill gas, in scf, input to the open flare(s) and/or the enclosed combustor(s), the number of hours that the open flare(s) and/or enclosed combustor(s) was (were) operated and the amount of landfill gas, in scf, input to the treatment system that processes the gas for subsequent sale or use.

III. Monitoring and/or Record Keeping Requirements (continued)

- 13.a** [OAC 3745-31-05(A)(3)]
The permittee shall perform daily inspections to observe the following non asbestos material handling activities when the activity(ies) is (are) being conducted:
- waste handling (depositing, spreading and compacting)
 - landfill daily and intermediate cover handling
 - wind erosion from landfill surfaces
 - general earthmoving and soil handling during landfill construction
 - landfill aggregate handling during landfill construction
- 13.b** For the material handling activities (on-site transportation, transfer, unloading, deposition, and compacting operations) of asbestos-containing materials, the permittee shall perform daily inspections to observe the activities when the activities are being conducted.
- 13.c** The inspections shall be documented and recorded as required in condition A.III.16 below.
- 14.** [OAC 3745-31-05(A)(3)]
No inspection shall be necessary when the non-asbestos material handling activity(ies) is (are) not being conducted, when there is snow and/or ice cover, and/or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned visible fugitive PE limitation. Any required inspection that is not performed due to any of the above identified events shall be performed during the next inspection pursuant to the minimum inspection frequency.
- 15.a** [OAC 3745-31-05(A)(3)]
The purpose of the non-asbestos material handling activity(ies) inspections is to determine the need for implementing the control measures specified in this permit to minimize and eliminate visible emissions of fugitive dust from the activities. The inspections shall be performed during representative, normal landfill operating conditions.
- 15.b** The purpose of the asbestos-containing material handling activity(ies) inspections is to determine the need for implementing the control measures specified in this permit to eliminate visible emissions of fugitive dust from the activities. The inspections shall be performed during representative, normal landfill operating conditions.
- 16.** [OAC 3745-31-05(A)(3)]
The permittee shall maintain a daily operations log which lists all of the above landfill activities (Note that if the records required in this Term and Condition exactly duplicate any records required under the facility's Division of Solid and Infectious Waste Management (DSIWM) permit, the DSIWM record will suffice to meet this Term and Condition). The daily operations log shall clearly indicate/contain the following:
- 16.a** the date and whether an inspection was performed and, if not performed, the reason why the inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - 16.b** the activities which were in operation;
 - 16.c** each activity where it was determined by the person conducting the inspection that it was necessary to implement the control measures to meet the above-mentioned visible fugitive PE limitation;
 - 16.d** whether control measures were employed to minimize or eliminate visible emissions of fugitive dust; and
 - 16.e** with regards to the waste handling activities, the amount, in tons, of waste material accepted for disposal.
- 17.** The permittee shall maintain an annual cumulative (calendar year) record to be updated quarterly:
- 17.a** of days inspections were not performed by the required frequency, and
 - 17.b** of days in which control measures were determined to be necessary by an inspector, but were not implemented.

IV. Reporting Requirements

1. [OAC 3745-31-05(A)(3)]
The permittee shall submit quarterly reports summarizing the asbestos disposal activities. The reports shall contain the following information:
 - 1.a the name, address and location of the facility, the calendar period covered by the report, and any changes in the methods of storage or the disposal operations; and
 - 1.b a list of all asbestos-containing waste consignments received including: the date received, the name of the waste generator, the name and location of the facility where the load originated, the quantity of asbestos, and any discrepancy or non-conformity discovered.

These quarterly reports shall be submitted to the Canton City Health Department, Air Pollution Control Division no later than January 31, April 30, July 31 and October 31 and shall cover the previous calendar quarters.

2. [OAC 3745-31-05(A)(3)]
As soon as possible and no longer than 30 days after receipt of the asbestos waste, the permittee shall send a copy of the signed waste shipment record to the waste generator.
3. [OAC 3745-31-05(A)(3)]
Upon discovery of a discrepancy between the quantity of asbestos waste designated on a waste shipment record and the quantity actually received, the permittee shall attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the State, local, district, or USEPA regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the Canton City Health Department, Air Pollution Control Division. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report.
4. [40 CFR 61 Subpart M]
The permittee shall submit, upon closure of the facility, a copy of the records of the asbestos waste disposal locations and quantities.
5. [OAC 3745-20-07(D)]
The permittee shall notify the Canton City Health Department, Air Pollution Control Division, 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:
 - 5.a scheduled starting and completion dates;
 - 5.b reason for disturbing the waste;
 - 5.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); and
 - 5.d location of any temporary storage site and the final disposal site.
6. [OAC 3745-31-05(A)(3)]
The permittee shall notify the Canton City Health Department, Air Pollution Control Division of any load of asbestos-containing material which is rejected, or any non-conforming load disposed of in accordance with the "Asbestos Spill Contingency Plan." Notification shall be provided as soon as possible by a phone contact, followed in writing by the next working day. The written notification shall provide a copy of the waste shipment record ("WSR"), if available, or when waste is not shipped with a WSR, provide available information concerning vehicle identification, source of the load, a description of the load, nature of discrepancy, and the location of disposal. If possible, non-conforming loads of suspect friable material shall be detained, or the location of disposal protected from damage, until the Canton City Health Department, Air Pollution Control Division is informed and provided the opportunity to inspect.

IV. Reporting Requirements (continued)

7. [OAC 3745-31-05(A)(3)]

The permittee shall submit an annual report by April 15th of each year, covering the previous calendar year, of the amount in tons of waste material accepted for disposal in that calendar year.

8.a Reporting Requirements for Landfill Gas Operations

[40 CFR 60.757(a)]

The permittee shall submit any and all reports in accordance with the Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 60.757, except as indicated in this and the following term and condition.

The reports shall be submitted to:

The Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, OH 44702-1544.

8.b [40 CFR 60.757(a)]

Each owner or operator subject to the requirements of this subpart shall submit an initial design capacity report to the Canton City Health Department, Air Pollution Control Division ninety days after the date of commenced construction, modification, or reconstruction for landfills that commence construction, modification, or reconstruction on or after March 12, 1996. The initial design capacity report shall contain the following information:

i. A map or plot of the landfill, providing the size and location of the landfill, and identifying all areas where solid waste may be landfilled according to the permit issued by the State, local, or tribal agency responsible for regulating the landfill.

ii. The maximum design capacity of the landfill. Where the maximum design capacity is specified in the permit issued by the State, local, or tribal agency responsible for regulating the landfill, a copy of the permit specifying the maximum design capacity may be submitted as part of the report. If the maximum design capacity of the landfill is not specified in the permit, the maximum design capacity shall be calculated using good engineering practices. The calculations shall be provided, along with such parameters as part of the report. The State, Tribal, local agency or Canton City Health Department, Air Pollution Control Division may request other reasonable information as may be necessary to verify the maximum design capacity of the landfill.

8.c [40 CFR 60.757(c)]

This facility has fulfilled the requirement to submit the initial collection and control system design plan. Therefore, the permittee is not subject to submitting the collection and control system design plan in 40 CFR 60.752(b)(2)(i) and in 40 CFR 60.757(c) except that this facility shall submit a report certifying that the collection and control system either conforms with the specifications for active collection systems in 40 CFR 60.759 or include a demonstration to the Canton City Health Department, Air Pollution Control Division's satisfaction of the sufficiency of the alternative provisions to 40 CFR 60.759.

8.d [40 CFR 60.757(d)]

Each owner or operator of a controlled landfill shall submit a closure report to the Canton City Health Department, Air Pollution Control Division within 30 days of waste acceptance cessation. The Canton City Health Department, Air Pollution Control Division may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR 258.60. If a closure report has been submitted to the Canton City Health Department, Air Pollution Control Division, no additional wastes may be placed into the landfill without filing a notification of modification as described under 40 CFR 60.7(a)(4).

IV. Reporting Requirements (continued)

8.e [40 CFR 60.757(e)]

Each owner or operator of a controlled landfill shall submit an equipment removal report to the Canton City Health Department, Air Pollution Control Division 30 days prior to removal or cessation of operation of the control equipment.

i. the equipment removal report shall contain all of the following items:

(a). a copy of the closure report submitted in accordance with 40 CFR 60.757(d);

(b). a copy of the initial performance test report demonstrating that the 15 year minimum control period has expired; and

(c). dated copies of three successive NMOC emission rate reports demonstrating that the landfill is no longer producing 50 megagrams or greater of NMOC per year.

ii. The Canton City Health Department, Air Pollution Control Division may request such additional information as may be necessary to verify that all of the conditions for removal in 40 CFR 60.752(b)(2)(v) have been met.

8.f 40 CFR 60.757(f)]

By January 31st and July 31st of each year, each owner or operator of a landfill seeking to comply with 40 CFR 60.752(b)(2) using an active collection system designed in accordance with 40 CFR 60.752(b)(2)(ii) shall submit to the Canton City Health Department, Air Pollution Control Division semi-annual reports, in accordance with Part II.A.5, of the recorded information in sections i. through vi. below. For enclosed combustion devices and flares, reportable exceedances are defined under 40 CFR 60.758(c).

i. value and length of time for exceedance of applicable parameters monitored under 40 CFR 60.756(a), (b), (c) and (d);

ii. description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under 40 CFR 60.756;

iii. description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not operating;

iv. all periods when the collection system was not operating in excess of 5 days;

v. the location of each exceedance of the 500 parts per million methane concentration as provided in 40 CFR 60.753(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month; and

vi. the date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3) and (5), and (c)(4) of 40 CFR 60.755.

IV. Reporting Requirements (continued)

- 8.g** [40 CFR 60.757(g)]
The permittee shall submit the following information with the initial performance test report required pursuant to 40 CFR 60.8, if not already completed:
- i. a diagram of the collection system showing collection system positioning, including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for the future collection system expansion;
 - ii. the data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based;
 - iii. the documentation of the presence of asbestos or nondegradable material for each area from which collection wells have been excluded based on the presence of asbestos or nondegradable material;
 - iv. the sum of the gas generation flow rate for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area;
 - v. the provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill; and
 - vi. the provisions for the control of off-site migration.
- 9.** [OAC 3745-31-05(A)(3)]
By April 15th of each year, the permittee shall submit an annual report covering the previous calendar year detailing the amount of landfill gas, in scf, produced by the landfill, amount of landfill gas, in scf, input to the open flare(s) and/or the enclosed combustor(s), the number of hours that the open flare(s) and/or enclosed combustor(s) was (were) operated and the amount of landfill gas, in scf, input to the treatment system that processes the gas for subsequent sale or use. These reporting requirements may be satisfied by including and identifying this information in the annual Fee Emissions Report.
- 10.** [OAC 3745-31-05(A)(3)]
By January 31 of each year, the permittee shall submit an annual report that identifies any of the following occurrences relating to inspections of landfill activities during the previous year:
- 10.a** each day during which an inspection was not performed by the required frequency; and
 - 10.b** each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

V. Testing Requirements

- 1.** [40 CFR 60.755(a)]
Except as provided in 40 CFR 60.752(b)(2)(i)(B), the specified methods in paragraphs 1.a. through 1.f. of this section shall be used to determine whether the gas collection system is in compliance with 40 CFR 60.752(b)(2)(ii).

V. Testing Requirements (continued)

1.a For the purposes of calculating the maximum expected gas generation flow rate from the landfill to determine compliance with 40 CFR 60.752(b)(2)(ii)(A)(1), one of the following equations shall be used. The k and Lo kinetic factors should be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42) or other site specific values demonstrated to be appropriate and approved by the Canton City Health Department, Air Pollution Control Division. If k has been determined as specified in 40 CFR 60.754(a)(4), the value of k determined from the test shall be used. A value of no more than 15 years shall be used for the intended use period of the gas mover equipment. The active life of the landfill is the age of the landfill plus the estimated number of years until closure.

i. For sites with unknown year-to-year solid waste acceptance rate:

$$Q_m = 2Lo R (e^{-kc} - e^{-kt})$$

where:

Q_m = maximum expected gas generation flow rate, cubic meters per year;
Lo = methane generation potential, cubic meters per megagram solid waste;
R = average annual acceptance rate, megagrams per year;
k = methane generation rate constant, year⁻¹;

t = age of the landfill at equipment installation plus the time the owner or operator intends to use the gas mover equipment or active life of the landfill, whichever is less. If the equipment is installed after closure, t is the age of the landfill at installation, years; and
c = time since closure, years (for an active landfill c = 0 and e^{-kc} = 1).

ii. For sites with known year-to-year solid waste acceptance rate:

$$QM = \text{the summation of } 2 \times k \times Lo \times Mi \times (e^{-kt} - e^{-k(t-i)}) \text{ for } i=1 \text{ through } i=n$$

where:

QM=maximum expected gas generation flow rate, cubic meters per year;
k=methane generation rate constant, year⁻¹;
Lo=methane generation potential, cubic meters per megagram solid waste;
Mi=mass of solid waste in the ith section, megagrams; and
ti=age of the ith section, years.

iii. If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, the equations in paragraphs V.1.a.i. and V.1.a.ii. of this section. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using the equations in paragraphs V.1.a.i. or V.1.a.ii. or other methods shall be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment.

1.b [40 CFR 60.755(a)(2)]

For the purposes of determining sufficient density of gas collectors for compliance with 40 CFR 60.752(b)(2)(ii)(A)(2), the owner or operator shall design a system of vertical wells, horizontal collectors, or other collection devices, satisfactory to the Canton City Health Department, Air Pollution Control Division, capable of controlling and extracting gas from all portions of the landfill sufficient to meet all operational and performance standards.

V. Testing Requirements (continued)

- 1.c** [40 CFR 60.755(a)(3)]
For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with 40 CFR 60.752(b)(2)(ii)(A)(3), the owner or operator shall measure gauge pressure in the gas collection header at each individual well, monthly. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under 40 CFR 60.753(b). If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Canton City Health Department, Air Pollution Control Division for approval.
- 1.d** [40 CFR 60.755(a)(4)]
Owners or operators are not required to expand the system as required in paragraph V.1.c. of this section during the first 180 days after gas collection system startup.
- 1.e** [40 CFR 60.755(a)(5)]
For the purpose of identifying whether excess air infiltration into the landfill is occurring, the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in 40 CFR 60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Canton City Health Department, Air Pollution Control Division for approval.
- 1.f** [40 CFR 60.755(a)(6)]
An owner or operator seeking to demonstrate compliance with 40 CFR 60.752(b)(2)(ii)(A)(4) through the use of a collection system not conforming to the specifications provided in 40 CFR 60.759 shall provide information satisfactory to the Canton City Health Department, Air Pollution Control Division as specified in 40 CFR 60.752(b)(2)(i)(C) demonstrating that off-site migration is being controlled.
- 2.** [40 CFR 60.755(c)]
The following procedures shall be used for compliance with the surface methane operational standard as provided in 40 CFR 60.753(d).
- 2.a** After installation of the collection system, the owner or operator shall monitor surface concentrations of methane along the entire perimeter of the collection area and along a pattern that traverses the landfill at 30 meter intervals (or a site-specific established spacing) for each collection area on a quarterly basis using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in paragraph 3 of this section.
- 2.b** The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.
- 2.c** Surface emission monitoring shall be performed in accordance with section 4.3.1 of Method 21 of appendix A of this part, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.

V. Testing Requirements (continued)

- 2.d** Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the actions specified in paragraphs d.i. through d.v. of this section shall be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements of 40 CFR 60.753(d).
- i. The location of each monitored exceedance shall be marked and the location recorded.
 - ii. Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be re-monitored within 10 calendar days of detecting the exceedance.
 - iii. If the re-monitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be monitored again within 10 days of the second exceedance. If the re-monitoring shows a third exceedance for the same location, the action specified in paragraph d.v. of this section shall be taken, and no further monitoring of that location is required until the action specified in paragraph d.v. has been taken.
 - iv. Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day re-monitoring specified in paragraph d.ii. or d.iii. of this section shall be re-monitored 1 month from the initial exceedance. If the 1-month re-monitoring shows a concentration less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month re-monitoring shows an exceedance, the actions specified in paragraph d.iii. or d.v. shall be taken.
 - v. For any location where monitored methane concentration equals or exceeds 500 parts per million above background three times within a quarterly period, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Canton City Health Department, Air Pollution Control Division for approval.
- 2.e** The owner or operator shall implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.[40 CFR 60.755(d)]
- 3.** [40 CFR 60.755(d)]
Each owner or operator seeking to comply with the provisions in A.V.2. shall comply with the following instrumentation specifications and procedures for surface emission monitoring devices:
- 3.a** The portable analyzer shall meet the instrument specifications provided in section 3 of Method 21 of appendix A of this part, except that "methane" shall replace all references to VOC.
 - 3.b** The calibration gas shall be methane, diluted to a nominal concentration of 500 parts per million in air.
 - 3.c** To meet the performance evaluation requirements in section 3.1.3 of Method 21 of appendix A of this part, the instrument evaluation procedures of section 4.4 of Method 21 of appendix A of this part shall be used.
 - 3.d** The calibration procedures provided in section 4.2 of Method 21 of appendix A of this part shall be followed immediately before commencing a surface monitoring survey.
- 4.** Fugitive landfill emissions resulting from the biological breakdown of organic wastes shall not exceed the values shown in Section A.I.1 which are based on calculations described below. These calculations represent the highest emission rates which could occur based on landfill gas emission rates predicted by a maximum annual rate of waste material accepted for disposal of 4,605,00 tons, USEPA's Landfill estimation program (LANDGEM), AP-42 and other emission factors, a capture efficiency of 75% (the AP-42 default value) for the gas collection and control system, an assumption that 25% of the wastes disposed are inert and are not broken down to create landfill gas, and other assumptions contained in the application.

V. Testing Requirements (continued)

4.a The resulting emissions were predicted:

Emission Limitation:

Fugitive emissions of non-methane organic compounds (NMOC) shall not exceed 167 TPY

Applicable Compliance Method:

NMOC: Emissions were predicted by USEPA's LANDGEM model.

4.b Emission Limitation:

Fugitive emissions of methane (CH₄) shall not exceed 26,057 TPY

Applicable Compliance Method:

CH₄: Emissions were predicted by USEPA's LANDGEM model and AP-42, Section 2.4.

4.c Emission Limitation:

Fugitive emissions of volatile organic compounds (VOC) shall not exceed 65.0 TPY.

Applicable Compliance Method:

VOC : Emissions were calculated based on predictions from USEPA's LANDGEM model and AP-42 equations.

4.d Emission Limitation:

Fugitive emissions of hazardous air pollutants (HAP) shall not exceed 23.71 TPY.

Applicable Compliance Method:

HAP: Emissions were calculated based on predictions from USEPA's LANDGEM model and AP-42 equations.

5. Emission Limitation:

Particulate emissions (PE) from the MSW landfill operations shall not exceed 1.64 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by employing the emission factors derived from the equations in AP-42, Compilation of Air Pollution Emission Factors, Chapter 13.2.4 (January 1995), for all material handling and storage piles.

Maximum potential uncontrolled emission rates for material handling and storage piles were calculated by using worst case calculations contained in the application based upon material handling being performed to support 15,000 tons per day (TPD) waste acceptance rate (Allowable Maximum Daily Waste Receipt).

6. Emission Limitation:

Visible fugitive particulate emissions from non-asbestos operations shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method:

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

No visible emission observations are specifically required to demonstrate compliance with the visible emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

V. Testing Requirements (continued)

7. Emission Limitation:

There shall be no visible emissions from asbestos-containing materials during on-site transportation, transfer, unloading, deposition or compacting operations of asbestos-containing materials.

Applicable Compliance Method:

Compliance with the no visible emissions requirement specified in section A.1.2.b shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

No visible emission observations are specifically required to demonstrate compliance with the visible emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

8.a The following emission limitations are applicable to landfill gas control device(s):

Emission Limitation

7.6 lbs of particulate matter emissions equal to or less than an aerodynamic diameter of nominally 10 microns (PM10) per hour and 33.5 tons of PM10/year

Applicable Compliance Method

Initial compliance with the above hourly emission limitation may be determined by multiplying the (maximum landfill gas generation rate of 13138 dscfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (17 lbs of PM/1,000,000 dscf methane*) x (60 minutes/hour) = 7.6 lb/hr

*AP-42, Section 2.4, Municipal Solid Waste Landfills [11/98] (all PM is assumed to be PM10)

Compliance with the hourly emission limitation shall be determined by multiplying the (maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in dscfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (17 lbs of PM/1,000,000 dscf methane*) x (60 minutes/hour) = result in lb/hr

The permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

No Method 1-5 testing is specifically required to demonstrate compliance with the hourly emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

The actual annual emissions shall be calculated by multiplying the calculated hourly emission rate by the hours of operation per year and dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

- 8.b** Emission Limitation
53.7 lbs of Carbon Monoxide (CO) per hour and 235.3tons of CO/year

Applicable Compliance Method

Initial compliance with the above hourly emission limitation has been determined by multiplying the maximum landfill gas generation rate of 14280 scfm, 0.50 cubic ft methane/cubic ft of landfill gas, 1000 BTU/cubic ft of methane, 0.125 lbs of CO/1,000,000 BTU*, and 60 minutes/hour = 53.7 lb/hr

*This value has been established based upon a manufacturer's performance guarantee.

Compliance with the hourly emission limitation shall be determined by multiplying the (maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (1000 BTU/cubic ft of methane) x (emissions factor of control equipment or the most recent value determined by stack testing in lbs of CO/1,000,000 BTU) x (60 minutes/hour) = result in lb/hr

The permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

No Method 1-4 and Method 10 tests are specifically required to demonstrate compliance with the hourly emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

The actual annual emissions shall be calculated by multiplying the calculated hourly emission rate by the hours of operation per year and dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

- 8.c** Emission Limitation
11.2 lbs of Oxides of Nitrogen (NOx) per hour and 49.2 tons of NOx/year

Applicable Compliance Method

Initial compliance with the above hourly emission limitation has been determined by multiplying the maximum landfill gas generation rate of 14280 scfm, 0.50 cubic ft methane/cubic ft of landfill gas, 1000 BTU/cubic ft of methane, 0.040 lbs of NOx/1,000,000 BTU*, and 60 minutes/hour = 11.2 lb/hr

*This value has been established based upon a manufacturer's performance guarantee.

Compliance with the hourly emission limitation shall be determined by multiplying the (maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (1000 BTU/cubic ft of methane) x (emissions factor of control equipment or the most recent value determined by stack testing in lbs of NOx/1,000,000 BTU) x (60 minutes/hour) = 17.1 lb/hr

The permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

No Method 1-4 and Method 7 tests are specifically required to demonstrate compliance with the hourly emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

The actual annual emissions shall be calculated by multiplying the calculated hourly emission rate by the hours of operation per year and dividing by 2000 lbs/ton

V. Testing Requirements (continued)

- 8.d** Emission Limitation
7.2 lbs of Sulfur Dioxide (SO₂) per hour and 31.4 tons of SO₂/year

Applicable Compliance Method

Initial compliance with the above hourly emission limitation shall be determined by using AP-42, Municipal Solid Waste Landfills [11/98] and the following equation:

$((\text{the maximum landfill gas generation rate of } 14280 \text{ scfm}) \times (49.6 \text{ *ppmv}/1000000 \text{ MMscf/scf})) \times (64.066 \text{ molecular weight of SO}_2)/((0.7302 \text{ universal gas constant} \times 520 \text{ Temp}) \times 60 \text{ min/hr}) = 7.2 \text{ lb/hr}$

*Sulfur concentration in the exhaust gas from AP-42 = 49.6 ppmv based upon 99.7% landfill gas control efficiency (represents worst-case emissions for SO₂)

Compliance with the hourly emission limitation shall be determined by the following equation:

$((\text{maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm}) \times (49.6 \text{ *ppmv}/1000000 \text{ MMscf/scf})) \times (64.066 \text{ molecular weight of SO}_2)/((0.7302 \text{ universal gas constant} \times 520 \text{ Temp}) \times 60 \text{ min/hr}) = \text{result}$

The permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

No Method 1-4 and Method 7 tests are specifically required to demonstrate compliance with the hourly emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

The actual annual emissions shall be calculated by multiplying the calculated hourly emission rate by the hours of operation per year and dividing by 2000 lbs/ton

- 8.e** Emission Limitation
2.3 lbs of NMOC/hour and 10.1 tons of NMOC/year

Applicable Compliance Method

Initial compliance with the above hourly emission limitation may be determined by using AP-42, Municipal Solid Waste Landfills [11/98] and the following equation:

$((\text{the maximum landfill gas generation rate of } 14280 \text{ scfm}) \times (595 \text{ *ppmv}/1000000 \text{ MMscf/scf}) \times (86.18 \text{ molecular weight of NMOC \{as hexane\}})/((0.7302 \text{ universal gas constant} \times 520 \text{ Temp})) \times (60 \text{ min/hr}) \times (1 - 0.98 \text{ control efficiency of the control device(s)}) = 2.31 \text{ lb/hr}$

V. Testing Requirements (continued)

*Default NMOC concentration in inlet gas from AP-42 = 595 ppmv.

Compliance with the hourly emission limitation shall be determined by the following equation:

$$\left(\frac{\text{the maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm} \times (595 \text{ ppmv}/1000000 \text{ MMscf/scf}) \times (86.18 \text{ molecular weight of NMOC \{as hexane\}})}{(0.7302 \text{ universal gas constant} \times '520 \text{ Temp})} \right) \times (60 \text{ min/hr}) \times (1-0.98 \text{ control efficiency of the control device(s)}) = \text{result in lb/hr}$$

*Default NMOC concentration in inlet gas from AP-42 = 595 ppmv.

The permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 18 of 40 CFR Part 60, Appendix A.

No Method 1-4 and Method 18 tests are specifically required to demonstrate compliance with the hourly emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

The actual annual emissions shall be calculated by multiplying the calculated hourly emission rate by the hours of operation per year and dividing by 2000 lbs/ton.

8.f Emission Limitation

0.9 lbs of VOC/hour and 4.0 tons of VOC/year

Applicable Compliance Method

Initial compliance with the above hourly emission limitation may be determined by using AP-42, Municipal Solid Waste Landfills [11/98] and the following equation:

$$\left(\frac{\text{the maximum landfill gas generation rate of 14280 scfm} \times (595 \text{ ppmv}/1000000 \text{ MMscf/scf}) \times (.39 \text{ percentage of VOC in landfill gas from AP-42}) \times (86.18 \text{ molecular weight of NMOC \{as hexane\}})}{(0.7302 \text{ universal gas constant} \times '520 \text{ Temp})} \right) \times (60 \text{ min/hr}) \times (1-0.98 \text{ control efficiency of the control device(s)}) = 0.9 \text{ lb/hr}$$

*Default NMOC concentration in inlet gas from AP-42 = 595 ppmv.

Compliance with the hourly emission limitation shall be determined by the following equation:

$$\left(\frac{\text{the maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm} \times (595 \text{ ppmv}/1000000 \text{ MMscf/scf}) \times (.39 \text{ percentage of VOC in landfill gas from AP-42}) \times (86.18 \text{ molecular weight of NMOC \{as hexane\}})}{(0.7302 \text{ universal gas constant} \times '520 \text{ Temp})} \right) \times (60 \text{ min/hr}) \times (1-0.98 \text{ control efficiency of the control device(s)}) = \text{result in lb/hr}$$

*Default NMOC concentration in inlet gas from AP-42 = 595 ppmv.

V. Testing Requirements (continued)

The permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 18 of 40 CFR Part 60, Appendix A.

No Method 1-4 and Method 18 tests are specifically required to demonstrate compliance with the hourly emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

The actual annual emissions shall be calculated by multiplying the calculated hourly emission rate by the hours of operation per year and dividing by 2000 lbs/ton.

8.g Emission Limitation

3.5 lb of Hydrogen Chloride (HCl) per hour and 15.2 tons of HCl/year

Applicable Compliance Method

Initial compliance with the above hourly emission limitation shall be determined by using AP-42, Municipal Solid Waste Landfills [11/98] and the following equation:

$$\left(\frac{\text{(the maximum landfill gas generation rate of 14280 scfm)} \times \text{(42.0 *ppmv/1000000 MMscf/scf)} \times \text{(36.5 molecular weight of HCl)}}{\text{(0.7302 universal gas constant} \times \text{520 Temp)} \times \text{60 min/hr}} \right) = 3.5 \text{ lb/hr}$$

*Sulfur concentration in the exhaust gas from AP-42 = 42.0 ppmv based upon 99.7% landfill gas control efficiency (represents worst-case emissions for HCl)

Compliance with the hourly emission limitation shall be determined by the following equation:

$$\left(\frac{\text{(maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm)} \times \text{(42.0 *ppmv/1000000 MMscf/scf)} \times \text{(36.5 molecular weight of HCl)}}{\text{(0.7302 universal gas constant} \times \text{520 Temp)} \times \text{60 min/hr}} \right) = \text{result in lb/hr}$$

*HCl concentration in the exhaust gas from AP-42 = 42.0 ppmv based upon 99.7% landfill gas control efficiency (represents worst-case emissions for HCl)

The permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 265 or 26A of 40 CFR Part 60, Appendix A.

No Method 1-4 and Method 265 or Method 26A tests are specifically required to demonstrate compliance with the hourly emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

The actual annual emissions shall be calculated by multiplying the calculate

V. Testing Requirements (continued)

*HCl concentration in the exhaust gas from AP-42 = 42.0 ppmv based upon 99.7% landfill gas control efficiency (represents worst-case emissions for HCl)

The permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 265 or 26A of 40 CFR Part 60, Appendix A.

No Method 1-4 and Method 265 or Method 26A tests are specifically required to demonstrate compliance with the hourly emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

The actual annual emissions shall be calculated by multiplying the calculated hourly emission rate by the hours of operation per year and dividing by 2000 lbs/ton.

8.h Emission Limitation:

No visible emissions from the open flare, except for periods not to exceed a total of 5 minutes, during any 2 consecutive hours.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.

No Method 22 tests are specifically required to demonstrate compliance with the visible emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

9. No testing is specifically required as part of this permit to install, the initial performance testing has been conducted to demonstrate that the current control device can operate in conformance with the requirements specified in 40 CFR Part 60.18.

However, if subsequently required or if the permittee installs an additional open flare(s) and/or an enclosed combustor(s) to control the additional predicted landfill gas volume, the permittee shall conduct or have conducted, additional performance test(s) to demonstrate that the flare(s) and/or enclosed combustor(s) can operate in conformance with the requirements specified below:

9.a The testing for any new control equipment installation shall be conducted within 180 days of start up.

9.b The total emissions from all control equipment shall comply with the limits contained in III.A.I.1.

9.c For an open flare, a performance test shall be conducted to demonstrate compliance with the requirements specified in 40 CFR 60.18. The net heating value of the gas being combusted in the flare and the actual exit velocity of the flare shall be determined in accordance with the procedures and methods specified in 40 CFR Part 60.18. The visible emission evaluations shall be conducted in accordance with the procedures specified in section A.V.8.h.

V. Testing Requirements (continued)

- 9.d** For the performance test required in 60.752(b)(2)(iii)(B), Method 25C or Method 18 of 40 CFR 60 Appendix A shall be used to determine compliance with 98 weight-percent efficiency or the 20 ppmv outlet concentration level, unless another method to demonstrate compliance has been approved by the Administrator as provided by 60.752(b)(2)(i)(B). If using Method 18 of appendix A of this part, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The following equation shall be used to calculate efficiency:

Control Efficiency = $(\text{NMOC}_{\text{in}} - \text{NMOC}_{\text{out}}) / (\text{NMOC}_{\text{in}})$
where,

NMOC_{in} = mass of NMOC entering control device

NMOC_{out} = mass of NMOC exiting control device

- 10.** After the installation of a collection and control system in compliance with 40 CFR Part 60.755, the permittee shall calculate the NMOC emission rate for the purposes of determining when the system can be removed as provided in 40 CFR Part 60.752(b)(2)(v) in accordance with the equation and procedures specified in 40 CFR Part 60.754(b), (b)(1), and (b)(2). The permittee may use another method to determine landfill gas flow rate and NMOC concentration if the method has been approved by the Ohio EPA as provided in 40 CFR Part 60.752(b)(2)(i)(B).

VI. Miscellaneous Requirements

- 1. None**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P902 - MSW landfill operations with asbestos disposal.	OAC rule 3745-31-05(A)(3) PTI 15-01601 issued 07/20/06.	Air Toxics Policy
<p>This Title V Renewal incorporates the Chapter 31 modification of PTI 15-303 (F002) issued January 29, 1986, PTI 15-991 (F004) issued February 18, 1993 and PTI 15-1244 (P001 and P901) issued December 24, 1996; all of which are superceded upon issuance of an administrative modification to correct the references in PTI 15-01601, for F001 and P902.</p>		

2. Additional Terms and Conditions

1. **None**

II. Operational Restrictions

1. **None**

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit P902 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrogen Chloride
 TLV (mg/m3): 2.99 mg/m3
 Maximum Hourly Emission Rate (lbs/hr): 3.46 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.44 ug/m3

MAGLC (ug/m3): 71.2 ug/m3

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes 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 Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used 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, changes in emission unit location, etc.).

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.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, location of the emission unit, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where 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.

IV. Reporting Requirements

1. **None**

V. Testing Requirements

1. **None**

VI. Miscellaneous Requirements

1. **None**

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	AMERICAN LANDFILL, INC.
Premise Number	15-76-18-1541
What makes this facility a Title V facility?	NSPS 40 CFR Part 60, Subpart WWW, NESHAP 40 CFR Part 63, Subpart AAAA, and Section 112 HCl > 10 TPY
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	See explanation of changes below.

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15-76-00-0378
Title V Renewal - Explanation of Changes.

Background

American Landfill, Inc. (ALI) facility has a calculated NMOC emission rate of greater than 50 megagrams per year (Mg/yr), and has submitted an acceptable design plan. ALI operates a landfill Gas Collection and Control System(GCCS) that is currently routed to an off-site gas treatment system for subsequent use as pipeline quality gas. The GCCS also routes the LFG to a open utility gas flare system that functions as a backup control system.

Only two (2) non-insignificant emissions units, F001 - Roadways and Parking Areas, and P902 - MSW landfill operations with asbestos disposal are currently operational based upon permit modifications. P901 - Tire Shredder and Z008 - Diesel Engine of PTI 15-01496 permit were shutdown and deleted before being incorporated into Title V renewal permit.

Deleted emissions units F002 - Material Handling, P001 - MSW Landfill Flare # 1, and F004 - Soil/Aggregate Stockpiles, and replaced them with emissions unit P902 - MSW Landfill Operations, in accordance with a **soon to be issued 'administrative modification'** to correct references in the PTI 15-01601, which was initially issued 07/20/06 for F001 and P902.

Facilitywide

Part II.B. IEU's were updated. One of the Part II.B. IEU's with applicable federal regulations was moved to the Part II.A. State and Federally Enforceable Section. IEU Z003 - LFG Fired Boiler was deleted. Z001 - leachate storage tanks, and Z002 - solidification process

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.	25-03		Emergency episode plan requirement
A.2.	77-07 (A)(13)		Identification of IEUs with applicable requirements.

C

Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
F001	No VE's RACM		31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	NA	OR - None, see BAT requirements in the Additional Terms and Conditions required to demonstrate compliance. M, R and Rp - Daily monitoring and recording. Records available for inspection upon request. ET - annual fugitive PE limit compliance demonstrated by calculation of the annual fugitive emissions from plant roadways and parking areas, total annual particulate emissions(TAPE) from both paved and unpaved areas using AP-42 formulas.
F001	No applicable limitation	17-07 (B)(1) 17-08 (B)		Y	N	N	N	N	N	N	N	N	N	NA	No limits since facility not located in an Appendix A area.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P902	10% Opacity 167.0 tons NMOC / yr 26,057 tons CH4 / yr 65.0 tons VOC / yr 23.71 tons HAP / yr 1.64 tons PE / yr (LFG)		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	BAT fugitive emissions requirement to limit visible PE, NMOC, CH4, VOC, HAP and PE. OR - annual MSW upper limit for disposal per Solid Waste; changes in design capacity; annual particulate emissions and fugitive gas emissions allowable; landfill gas control device options and limits; in accordance with NEDO Solid Waste PTI 02-12954 and CCHD APCD PTI 15-01601. Best available control measures shall be used. (See A.I.2.w through A.II.1.)
P902	LFG limitations		40 CFR Part 60 Subpart WWW (NSPS) and 40 CFR Part 63 Subpart AAAA (NESHAP)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - as stated in A.II.3 through A.II.11; see also A.I.2.j through A.I.2.u, M, R, Rp and ET: see sections A.III through A.V.
P902	No VEs (Asbestos)	20-06	40 CFR Part 61 Subparts A & M 31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	N	NA	Additional T&Cs A.I.2.b through A.I.2.i

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P902	LFG Flare limitations		40 CFR Part 60.18 40 CFR Part 60.752	N	N	Y	N	N	Y	N	Y	N	Y	Y	General requirements for a flare. Y for Misc: 40 CFR Part 60.752, which sites certain sections of 40 CFR 60.18 that must be followed.
P902	No applicable limitation	17-07 (B)(1) 17-08 (B)		Y	N	N	N	N	N	N	N	N	N	NA	No limits since this facility is not located in an Appendix A area.
P902	No open burning	19		N	Y	N	N	N	N	N	N	N	N	NA	OR - yes for no open burning.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.