

# Statement of Basis For Title V Permit

<b>Part I - General</b>	
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)?	<b>Yes</b>
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.	<b>No</b>
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)	<b>N/A</b>
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)	<b>N/A</b>
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)	<b>N/A</b>
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)	<b>See explanation of changes below.</b>

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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)		40 CFR Part 61 Subparts A & M	N	N	Y	N	N	Y	N	Y	N	N	NA	Additional T&Cs A.I.2.b through A.I.2.i
		20-06	31-05 (A)(3)												

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		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.