State of Ohio Environmental Protection Agency

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

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

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

11/17/06

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

16-67-01-0007
BFI of Ohio / Willowcreek Landfill
Dan Titus
43502 Oberlin-Elyria Road
Oberlin, OH 44074

Dear Dan Titus:

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 Akron 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 Akron Air Pollution Control.

Sincerely,

Michael W. Ahern

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

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

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 11/17/06	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 16-67-01-0007 to:

BFI of Ohio / Willowcreek Landfill
1043 State Route 225
Atwater, OH 44201

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

F002 (Existing MSW Landfill) MSW Landfill with gas collection and control system.		

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:

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308
(330) 375-2480

OHIO ENVIRONMENTAL PROTECTION AGENCY

Joseph P. Koncelik
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 <u>Federally Enforceable</u> 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. The following insignificant emissions units are located at this facility:

F001 - clay storage piles
F003 - roadways and parking areas

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 a 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/or 3745-21.

B. State Only Enforceable Section

1. The permittee shall not cause or allow any open burning in violation of OAC Chapter 3745-19 at this facility.

2. The permittee shall not initiate or allow any salvage operation to be conducted at this location without prior approval of the Ohio EPA. This excludes recycling or energy recovery, unless Ohio EPA approval is needed.

3. The permittee shall operate this facility in such a manner that it does not become offensive or objectionable to the public in violation of OAC rule 3745-15-07. If an odor resulting from construction activities is detected at the property line, the permittee shall institute all available mitigation measures. Odor mitigation measures deemed appropriate by the Director to protect the comfort, repose, health or safety of the public shall be implemented upon request.

4. Authority to Enter: Pursuant to the authority in OAC rule 3745-77-07(C)(2) or ORC Section 3704.03 (L), any representative of the Director may, upon presentation of proper identification, enter at any reasonable time upon any portion of the property where this landfill is located, including any improvements thereon, to make inspections, take samples, conduct tests and examine records or reports pertaining to any emissions of air contaminants and any monitoring equipment, emissions control equipment or methods. No operator or agent of this landfill shall act in any manner to refuse, hinder, or thwart this legal right of entry.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Existing MSW Landfill (F002)

Activity Description: MSW Landfill with gas collection and control system.

A. State and Federally 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Closed municipal solid waste (MSW) landfill (no longer accepting waste) equipped with an active gas collection and control system (enclosed flare)	OAC rule 3745-31-05(C)	See A.I.2.j below.
	OAC rule 3745-21-08	See A.I.2.a below.
	OAC rule 3745-76-07	See A.I.2.c below.
	OAC rule 3745-17-07(A)	See A.I.2.f below.
	OAC rule 3745-17-11(B)	Particulate emission (PE) shall not exceed 0.551 pound per hour.
	40 CFR 60.18(c)(1)	no visible emissions from the flare, except as provided by rule
	40 CFR 60 Subpart Cc	See A.I.2.c below.
	40 CFR, Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills	See A.I.2.c, A.I.2.g, A.I.2.h, and A.I.2.k below
	40 CFR, Part 63, Subpart A, General provisions, and 40 CFR, Part 63, Subpart AAAA, National Emissions Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills	See A.I.2.i below.
	OAC rule 3745-31-05(A)(3) (PTI 16-1155) (PTI 16-1103)	2.18 lbs/hr of NMOC 5.92 lbs/hr of NOx 3.24 lbs/hr of SO2 0.01 lb/hr of benzene 0.03 lb/hr of vinyl chloride (refers to control system) 2.0 tpy of particulate matter 0.059 ton of particulate matter per acre of cell per year (refers to landfill cells)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		See A.I.2.b, A.I.2.m and A.I.2.n below.

2. Additional Terms and Conditions

2.a The permittee shall minimize the carbon monoxide emissions from this emissions unit by the use of the best available control techniques and operating practices in accordance with best current technology.

2.b Design, construction and siting of the gas extraction wells and gas collection system shall be in accordance with Ohio's Chapter 111(d) plan as approved by the US EPA, BFI's gas collection and control system design plan submitted pursuant to Chapter 111(d), and standard industry methods and practices currently in use. In addition, the gas collection system shall:

i. be designed to handle the maximum expected gas flow rate over the lifetime of the gas control or treatment system equipment from the entire area of the landfill that warrants control over the equipment lifetime; and

ii. collect gas at a sufficient extraction rate.

2.c The collected gas shall be routed to a control system designed and operated within the parameters demonstrated in the performance test to reduce NMOCs 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 NMOC concentration shall be determined by Method 25A.

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 §60.756;

2.d All landfill gas collected shall be directed to the flare station.

2.e The equipment that constitutes the gas collection and control system shall be properly maintained and kept in good operating condition at all times.

2.f The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart 60.18(C)(1).

2.g The active lfg collection system shall satisfy the following requirements, as specified in 40 CFR Part 60.752(b)(2)(ii)(A):

i. 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.

ii. The system shall collect gas at a sufficient extraction rate.

iii. The system shall be designed to minimize off-site migration of subsurface gas.

2.h The collection and control system may be capped or removed provided that all of the following conditions, as specified in 40 CFR Part 60.752(b)(2)(v), are met:

i. The landfill shall no longer be accepting solid waste and shall be permanently closed (pursuant to 40 CFR Part 258.60).

ii. The collection and control system shall have been in operation a minimum of 15 years.

iii. The calculated NMOC gas produced by the landfill shall be less than 55 TPY on three successive test dates. The test dates shall be no less than 90 days apart, and no more than 180 days apart.

2. Additional Terms and Conditions (continued)

2.i 40 CFR Part 63, National Emissions Standards for Hazardous Air Pollutants:

i. Subpart AAAA establishes national emission standards for hazardous air pollutants for existing and new municipal solid waste (MSW) landfills. This subpart requires all landfills described in Section 63.1935 to meet the requirements of 40 CFR Part 60, Subpart Cc or WWW and requires timely control of bioreactors. This subpart also requires such landfills to meet the startup, shutdown, and malfunction (SSM) requirements of the general provisions of this part and provides that compliance with the operating conditions shall be demonstrated by parameter monitoring results that are within the specified ranges. It also includes additional reporting requirements.

ii. Municipal solid waste landfill or MSW landfill means an entire disposal facility in a contiguous geographical space where household waste is placed in or on land. A municipal solid waste landfill may also receive other types of RCRA Subtitle D wastes (see Section 257.2 of this chapter) such as commercial solid waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial solid waste. Portions of a municipal solid waste landfill may be separated by access roads. A municipal solid waste landfill may be publicly or privately owned. A municipal solid waste landfill may be a new municipal solid waste landfill, an existing municipal solid waste landfill, or a lateral expansion.

iii. This MSW landfill is an existing affected source. The facility is an existing source for Subpart AAAA because this MSW landfill has not commenced construction or reconstruction after November 7, 2000. The facility is an affected source for Subpart AAAA as defined in 40 CFR 63.1935(a)(3) because the facility has a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year NMOC as calculated according to Section 60.754(a) of Subpart WWW of the New Sorce Performance Standards,

iv. The permittee shall comply with this subpart by January 16, 2004. The permittee is no longer required to comply with this subpart when controls are no longer required by 40 CFR 60.752(b)(2)(v) of Subpart WWW.

v. As defined in Subpart AAAA, 40 CFR 63.1955, this MSW landfill is subject to the requirements of 40 CFR Part 60, Subpart WWW, the Subpart AAAA requirements in 40 CFR 63.1960 through 63.1985, and the following sections of 40 CFR Part 63 Subpart A, the General Provisions of the National Emissions Standards for Hazardous Air Pollutants for Source Categories (NESHAPS):

63.1(a), 63.1(b), 63.1(e), 63.2, 63.4, 63.5(b), 63.6(e), 63.6(f), 63.10(b)(2)(i) through 63.10(b)(2)(v), 63.10(d)(5), 63.12(a), and 63.15.

vi. For approval of collection and control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, record keeping or reporting provisions, the permittee must follow the procedures in 40 CFR 60.752(b)(2). If alternatives have already been approved under 40 CFR Part 60 Subpart WWW or the federal plan, or EPA approved and effective State or tribal plan, these alternatives can be used to comply with this subpart, except that all affected sources must comply with the SSM requirements in Subpart A of this part as specified in Table 1 of this subpart and all affected sources must submit compliance reports every 6 months as specified in Section 63.1980(a) and (b), including information on all deviations that occurred during the 6-month reporting period.

vii. General and Continuing Compliance Requirements

Compliance is determined in the same way it is determined for 40 CFR Part 60, Subpart WWW, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence. In addition, continuous parameter monitoring data, collected under 40 CFR 60.756(b)(1), (c)(1), and (d) of Subpart WWW, are used to demonstrate compliance with the operating conditions for control systems. If a deviation occurs, the permittee has failed to meet the control device operating conditions described in this subpart and has deviated from the requirements of this subpart. Finally, the permittee must develop and implement a written SSM plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the SSM plan must be maintained on site. Failure to write, implement, or maintain a copy of the SSM plan is a deviation from the requirements of this Subpart.

2. Additional Terms and Conditions (continued)

viii. Deviations

(a) Emissions limitation means any emission limit, opacity limit, operating limit, or visible emissions limit.

(b) Deviation means any instance in which an affected source subject to this Subpart, or an owner or operator of such a source:

(i) fails to meet any requirement or obligation established by this subpart, including, but not limited to, any emissions limitation (including any operating limit) or work practice standard;

(ii) fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or

(iii) fails to meet any emission limitation (including any operating limit), or work practice standard in this Subpart during SSM, regardless of whether or not such failure is permitted by this Subpart.

(c) For the purposes of the landfill monitoring and SSM plan requirements, a deviation occurs when the control device operating parameter boundaries described in 40 CFR 60.758(c)(1) of Subpart WWW are exceeded, or, when an SSM plan is not developed, implemented, or maintained on site.

ix. Implementation and enforcement

This Subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or tribal agency. If the EPA Administrator has delegated authority to a State, local, or tribal agency, then that agency as well as the U.S. EPA has the authority to implement and enforce this Subpart. Contact the applicable EPA Regional Office to find out if this Subpart is delegated to a State, local, or tribal agency.

In delegating implementation and enforcement authority of this Subpart to a State, local, or tribal agency under Subpart E of this part, the authority to approve alternatives to the standards in Section 63.1955 are retained by the EPA Administrator and are not transferred to the State, local, or tribal agency. Where these standards reference another subpart, the cited provisions will be delegated according to the delegation provisions of the referenced subpart.

2.j The permittee shall emit no more than 2.26 lbs/hr of hydrochloric acid (HCl) and 21.7 lbs/hr of carbon monoxide (CO).

Annual emissions from the enclosed flare shall not exceed 9.9 tpy of HCl and 95.0 tpy of CO as rolling, 12-month summations.

The permittee has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid being classified as a major source.

2. Additional Terms and Conditions (continued)

2.k When a MSW landfill subject to this subpart is closed, the owner or operator is no longer subject to the requirement to maintain an operating permit under part 70 or 71 of chapter 40 for the landfill if the landfill is not otherwise subject to the requirements of either part 70 or 71 and if the following condition is met:

The owner or operator meets the conditions for control system removal specified in paragraph (b)(2)(v) of section 60.752 of 40 CFR Part 60:

The collection and control system may be capped or removed provided that all the conditions of paragraphs (b)(2)(v) (A), (B), and (C) of this section are met:

(A) The landfill shall be a closed landfill as defined in §60.751 of this subpart. A closure report shall be submitted to the Administrator as provided in §60.757(d);

(B) The collection and control system shall have been in operation a minimum of 15 years; and

(C) Following the procedures specified in §60.754(b) of this subpart, the calculated NMOC gas produced by the landfill shall be less than 50 megagrams per year on three successive test dates. The test dates shall be no less than 90 days apart, and no more than 180 days apart.

2.l The landfill cells that are covered by this permit are listed below:

existing landfill cells

2.m The permittee shall employ reasonably available control measures for wind erosion from area surfaces associated with the landfill cells 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 landfill cells with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.n The above-mentioned control measures shall be employed for wind erosion from each area if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a landfill 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.

II. Operational Restrictions

1. 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 §60.756;

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60.752(b)]

2. The total quantity of landfill gas burned in the flare system shall not exceed 3.91 million cubic feet per day.

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

3. If the temperature monitor detects a no flame condition which cannot be immediately restarted, the system shall automatically shut down the flow of landfill gas.

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

4. All recording devices shall be synchronized based on the time of day.

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

II. Operational Restrictions (continued)

5. The skin temperature of the flare shroud within four feet of all the source test ports shall not exceed 250 degrees Fahrenheit. If a heat shield is required to meet the requirement, its design shall be approved by the Ohio EPA prior to its construction. The heat shield, if required to meet the temperature requirement, shall be in place whenever a source test is conducted for the Ohio EPA.

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

6. The gas collection system shall be operated at negative pressure to ensure that all landfill gas is directed to the flare station as required by A.I.2.d above.

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

7. The emissions from this emissions unit shall not exceed 9.9 tpy for HCl and 95.0 tpy for CO, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable emissions levels specified in the following table:

Maximum Allowable Cumulative Emissions of Month(s)	Maximum Allowable Cumulative Emissions of HCl (tons)	CO (tons)
1	0.9	7.9
1-2	1.8	15.8
1-3	2.7	23.8
1-4	3.6	31.7
1-5	4.5	39.6
1-6	5.4	47.5
1-7	6.3	55.4
1-8	7.2	63.3
1-9	8.1	71.3
1-10	9.0	79.2
1-11	9.9	87.1
1-12	9.9	95.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide annual emission limitations for HCl and CO shall be based upon a rolling 12-month summation of the monthly emissions.

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

8. The permittee shall operate the collection system such that gas shall be collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for 5 years or more if active, or for 2 years or more if closed or at final grade.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60.753(a)]

II. Operational Restrictions (continued)

9. 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 permittee shall record instances when positive pressure occurs in efforts to avoid a fire);
B. use of a geomembrane or synthetic cover (the permittee shall develop acceptable pressure limits in the design plan); or
C. a decommissioned well (a well may experience a static positive pressure after shutdown to accommodate for declining flows).

All design changes shall be approved by the Director of Ohio EPA.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60.753(b)]

10. The permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius and with either a nitrogen level less than 20% or an oxygen level less than 5%. The permittee 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 nor significantly inhibit anaerobic decomposition by killing methanogens.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60.753(c)]

11. 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60.753(d)]

12. The permittee shall operate the collection system such that all collected gases are vented to a control system designed and operated in compliance with section A.I.2.e. 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 one hour.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60.753(e)]

13. The permittee shall operate the flare at all times when the collected gas is routed to the system.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60.753(f)]

14. A pilot flame shall be maintained at all times in the flare's pilot light burner.

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

15. The equipment associated with this emissions unit shall be operated and maintained by personnel properly trained in its operation.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all periods of operation during which the average combustion temperature was more than 28 oC below the average combustion temperature during the most recent performance test at which compliance with §60.752(b)(2)(iii) was determined; and

b. a log of the downtime for the control device and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-1155 and 40 CFR Part 60.758(c)]

2. This facility shall operate and maintain a continuous gas flow monitor and recorder which measures and records the gas flow to the control device at least every 15 minutes. The gas flow monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record, on a daily basis, the total volume of landfill gas burned in the flare system.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-1155]

3. The permittee shall install a sampling port at each well and measure and record the gauge pressure in the gas collection header on a monthly basis.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-1155]

4. The permittee shall, upon each visit to this closed facility, and at a minimum of once per month, during normal operating conditions visually inspect the flare and record whether or not any visible emissions are present.

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

5. The gas collection and control system shall be equipped with an auto-dial communication mechanism incorporated into it so that should a malfunction develop with the flare and/or blower system, the gas system technician will automatically be paged by phone.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The permittee shall on a monthly basis, calculate and record for this emissions unit the HCl and CO emission rates, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. After the installation of a collection and control system in compliance with 40 CFR Part 60.755, the permittee shall calculate and maintain records of 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).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60.754(b)]

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

8. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from landfill surfaces associated with each cell in accordance with the following frequencies:

landfill cell identification	minimum wind erosion inspection frequency
existing landfill cells	weekly

The above-mentioned inspection frequency shall only be performed on a monthly basis as long as all existing cells have a complete vegetation cover.

[Authority for term: OAC rule 3745-77-07(C)(1)]

9. No inspection shall be necessary for wind erosion from the surface of a cell when the cell is covered with snow and/or ice and for any landfill cell activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for term: OAC rule 3745-77-07(C)(1)]

10. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

[Authority for term: OAC rule 3745-77-07(C)(1)]

11. The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Any breakdown or malfunction of the landfill gas flare resulting in the emission of raw landfill gas from the gas collection and control system shall be reported to the Ohio EPA within one hour after the occurrence, or as soon as reasonably possible, and immediate remedial measures shall be undertaken to correct the problem and prevent further emissions to the atmosphere.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-1155]

2. In the event of a potential emergency, such as a fire within the landfill, wells affected may be temporarily shut off, which could result in a positive gauge pressure. The Ohio EPA field office shall be notified within one working day of any shutdowns of any wells.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit semi-annual reports which include an identification of any record showing that visible emissions were present. The reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.I.c.iii of this permit..

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit deviation (excursion) reports which include the following information:

a. an identification of each month during which the gauge pressure in the gas collection header gave a positive pressure reading and the actual gauge pressure reading for each such month;

b. an identification of each period during which the temperature in the combustion device was more than 28 oC below the average combustion temperature during the most recent performance test at which compliance with §60.752(b)(2)(iii) was determined, and a copy of the recorded chart for each such period; and

c. an identification of each day during which the total volume of landfill gas burned by the flare exceeded 3.91 million cubic feet, and the actual total volume of landfill gas burned for each such day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-1155 and 40 CFR Part 60.757(f)]

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for CO and HCl and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. These deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

7. The permittee shall submit annual reports which specify the HCl and CO emissions, in tons. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

8. NSPS WWW Collection System Requirements:

The permittee shall submit annual reports in accordance with 40 CFR 60.757(f), including paragraphs (f)(1) through (f)(6), except as indicated in A.IV.9. This report is to document the performance of the active gas collection system as required in 60.752(b)(2)(ii)(A).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60.757(f)]

IV. Reporting Requirements (continued)

9. Part 63 NESHAP Requirements:

a. The permittee shall keep records and submit reports as specified in the general provisions of 40 CFR Part 60 and Subpart WWW except that the permittee shall submit the annual report described in 40 CFR 60.757(f) every 6 months. These reports shall be submitted following the timing required by 40 CFR 60.757(f) but shall be submitted semiannually and shall cover the previous 6 months as follows:

Reporting Period	Report Submittal Date
January 1 through June 30	September 30
July 1 through December 31	March 30

By maintaining compliance with this term and condition, compliance is also maintained with A.IV.8 above.

B. The permittee shall keep records and submit reports as specified in 40 CFR Part 63, Subpart AAAA.

C. The permittee shall keep records and submit reports as specified in the following sections of the general provisions, Subpart A, of 40 CFR Part 63. These sections include 63.1(a), 63.1(b), 63.1(e), 63.2, 63.4, 63.5(b), 63.6(e), 63.6(f), 63.10(b)(2)(i) through 63.10(b)(2)(v), 63.10(d)(5), 63.12(a), and 63.15 (Sections 63.4, 63.5(b), 63.6(e), 63.10(b)(2)(i) through 63.10(b)(2)(v), and 63.10(d)(5) should be examined especially closely.). Applicable records in the general provisions of 40 CFR Part 63 include items such as SSM plans and the SSM plan reports.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 (sections listed above)]

10. Review notification procedures for malfunction and maintenance.
Any breakdown or malfunction resulting in the emission of raw landfill gas shall be reported to the Akron Air Pollution Control District within one hour after the occurrence, or as soon as reasonably possible, and immediate remedial measures shall be taken to correct the problem and prevent further emission to the atmosphere.

[Authority for term: OAC rule 3745-77-07(C)(1)]

11. The permittee shall submit deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[Authority for term: OAC rule 3745-77-07(C)(1)]

12. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.I.c of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

13. If no active landfill cells remain at this facility, then the permittee can discontinue the monitoring requirements of III.A.III.8, record keeping requirements of III.A.III.11, and reporting requirements of III.A.IV.11 and III.A.IV.12 above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NMOC, HCl, and CO.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for NMOC - Method 25A of 40 CFR Part 60, Appendix A;
for CO - Method 10 of 40 CFR Part 60, Appendix A; and
for HCl - Method 26 or 26A of 40 CFR, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. Personnel from the appropriate Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

5.a Emission Limitation:

no visible emissions, except as provided by rule

Applicable Compliance Method:

Compliance with the visible PE limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(4).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

5.b Emission Limitation:

Particulate emission (PE) shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5.c Emission Limitation:

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

Applicable Compliance Method:

Compliance with the destruction efficiency requirement for NMOC shall be determined based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Method 25A.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5.d Emission Limitation:

2.26 lbs/hr of HCl

Applicable Compliance Method:

Compliance with the allowable hourly HCl emission limitation shall be determined based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 26 or 26A.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5.e Emission Limitation:

9.90 tpy of HCl

Applicable Compliance Method:

The annual allowable HCl emission limitation was developed by multiplying the hourly allowable HCl emission limitation from above by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5.f Emission Limitation:

21.7 lbs/hr of CO

Applicable Compliance Method:

Compliance with the allowable hourly CO emission limitation shall be determined based on the results fo emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 10.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

5.g Emission Limitation:

95.0 tpy of CO

Applicable Compliance Method:

The annual allowable CO emission limitation was developed by multiplying the hourly allowable CO emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

6. The nitrogen level shall be determined using Method 3C of 40 CFR Part 60, Appendix A, unless an alternative test method is established as allowed by 40 CFR Part 60.752(b)(2)(i).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60.753(c)(1)]

7. The oxygen level shall be determined by an oxygen meter using Method 3A of 40 CFR Part 60, Appendix A, unless an alternative test method is established as allowed by 40 CFR Part 60.752(b)(2)(i), except that:

a. the span shall be set so that the regulatory limit is between 20 and 50% of the span;

b. a data recorder is not required;

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

d. a calibration error check is not required; and

e. the allowable sample bias, zero drift, and calibration drift are plus or minus 10%.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60.753(c)(2)]

8. Emission Limitation:

2.18 lbs/hr of NMOC

Applicable Compliance Method:

Compliance with the allowable mass emission rate for NMOC shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 25A.

[Authority for term: OAC rule 3745-77-07(C)(1)]

9. Emission Limitation:

5.92 lbs/hr of NOx

Applicable Compliance Method:

If required, compliance with the allowable mass emission rate for NOx shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 7 or 7E.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

10. Emission Limitation:

3.24 lbs/hr of SO2

Applicable Compliance Method:

If required, compliance with the allowable mass emission rate for SO2 shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 6 or 6C.

[Authority for term: OAC rule 3745-77-07(C)(1)]

11. Emission Limitation:

0.01 lb/hr of benzene

Applicable Compliance Method:

If required, compliance with the allowable mass emission rate for benzene shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18.

[Authority for term: OAC rule 3745-77-07(C)(1)]

12. Emission Limitation:

0.03 lb/hr of vinyl chloride

Applicable Compliance Method:

If required, compliance with the allowable mass emission rate for vinyl chloride shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18.

[Authority for term: OAC rule 3745-77-07(C)(1)]

13. Emission Limitation:

2.0 tpy of particulate matter

Applicable Compliance Method:

Multiply the RACM, Table 2.1.2-5, particulate emission factor of 0.048 ton of particulates per acre per year by the maximum number of acres worked per year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

14. Emission Limitation:

0.059 tons of particulate matter per acre of cell per year

Applicable Compliance Method:

Compliance shall be demonstrated by the RACM, Table 2.1.2-5, particulate emission factor of 0.048 tons of particulates per acre of cell worked per year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

15. 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 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).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60.754(b)]

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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

****

THIS IS THE LAST PAGE OF THE PERMIT

****

Statement of Basis For Title V Permit

Part I - General	
Company Name	BFI of Ohio/Willowcreek Landfill
Premise Number	1667010007
What makes this facility a Title V facility?	Design capacity of greater than 2.5 million megagrams per 40 CFR Part 60.752(c)
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)	F002 - addition of MACT 40 Part 63 Subpart AAAA, NSPS 40 CFR Part 60 Subpart WWW, along with OAC rule 3745-17-07(A) limiting visible emisions

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	31-03		list of insignificant emissions units F through Z053
B.1	19		open burning prohibited
B.2		N	salvage operations probitited
B.3	15-07		odor mitigation required
B.4	77-07		authorization for agency representatives entry to property

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	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													

F002	best available control techniques to minimize CO emissions	21-08		n	y	y	n	n	y	n	y	n	y	n	OR - CAM is not aplicable. The permittee shall maintain a flare temperature that is not more than 28 degrees Celcius below the average combustion temperature during the most recent performance test at which compliance with 40 CFR Part 60.752(b)(2)(iii) was determined. Negative pressure shall be maintained in the gas collection system. Flare temperature shall be continuously monitored and recorded, and the permittee shall submit deviation reports to show compliance with the flare temperature requirements. Gas flow shall be continuously monitored and recorded on a daily basis. The permittee shall submit deviation reports to show compliance with the negative pressure requirements.
F002	no visible emissions from flare		NSPS 40 CFR Part 60.18 (c)(1)	n	n	y	n	n	y	n	y	n	n	n	OR - CAM is not applicable. A minimum of monthly visible emissions inspections will be conducted, their results recorded, and excursion reports submitted to show compliance with the particulate limitation. ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
F002	98% reduction of NMOC	76-07	NSPS 40 CFR Part 60 Subpart Cc and 40 CFR Part 60 Subpart WWW	n	y	y	n	n	y	n	y	n	y	n	OR - CAM is not applicable. The permittee shall maintain a flare temperature that is not more than 28 degrees Celcius below the average combustion temperature during the most recent performance test at which compliance with 40 CFR Part 60.752(b)(2)(iii) was determined. Negative pressure shall be maintained in the gas collection system. Flare temperature shall be continuously monitored and recorded, and the permittee shall submit deviation reports to show compliance with the flare temperature requirements. Gas flow shall be continuously monitored and recorded on a daily basis. The permittee shall submit deviation reports to show compliance with the negative pressure requirements.

F002	minimize off-site migration of subsurface gas		40 CFR Part 60 Subpart WWW	n	y	y	n	n	y	n	y	n	n	n	OR - The gas collection system shall be operated at negative pressure to ensure that all landfill gas is directed to the flare station, and if the temperature monitor detects a no flame condition which cannot be immediately restarted, the system shall automatically shut down the flow of landfill gas. ET - Emission testing is not required. Compliance shall be demonstrated through the operational restrictions, monitoring and record keeping requirements.
F002	2.26 pounds of hydrochloric acid (HCl) per hour		self imposed by permittee in order to limit the potential to emit	n	y	y	n	n	y	n	y	n	y	n	OR - CAM is not applicable. The permittee shall operate the collection system such that all collected gases are vented to a control device which shall be operated within the parameter ranges established during the initial or most recent performance test. 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 the venting of the gas to the atmosphere shall be closed within one hour. Permittee must comply with a rolling 12-month summation of the monthly emissions for Hcl and CO. These limits were requested by the applicant to be imposed in order to limit the potential to emit, and avoid being classified as a major source.
F002	21.7 pounds of carbon monoxide (CO) per hour		self imposed by permittee in order to limit the potential to emit	n	y	y	n	n	y	n	y	n	y	n	**OR - CAM is not applicable. The permittee shall operate the collection system such that all collected gases are vented to a control device which shall be operated within the parameter ranges established during the initial or most recent performance test. 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 the venting of the gas to the atmosphere shall be closed within one hour. Permittee must comply with a rolling 12-month summation of the monthly emissions for Hcl and CO. These limits were requested by the applicant to be imposed in order to limit the potential to emit, and avoid being classified as a major source.**

F002	9.9 TPY of HCl		self imposed by permittee in order to limit the potential to emit	n	y	y	n	n	y	n	y	n	y	n	**OR - CAM is not applicable. The permittee shall operate the collection system such that all collected gases are vented to a control device which shall be operated within the parameter ranges established during the initial or most recent performance test. 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 the venting of the gas to the atmosphere shall be closed within one hour. Permittee must comply with a rolling 12-month summation of the monthly emissions for Hcl and CO. These limits were requested by the applicant to be imposed in order to limit the potential to emit, and avoid being classified as a major source.**
F002	95.0 TPY of CO		self imposed by permittee in order to limit the potential to emit	n	y	y	n	n	y	n	y	n	y	n	**OR - CAM is not applicable. The permittee shall operate the collection system such that all collected gases are vented to a control device which shall be operated within the parameter ranges established during the initial or most recent performance test. 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 the venting of the gas to the atmosphere shall be closed within one hour. Permittee must comply with a rolling 12-month summation of the monthly emissions for Hcl and CO. These limits were requested by the applicant to be imposed in order to limit the potential to emit, and avoid being classified as a major source.**

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

- **Instructions for Part III:**

  - 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.

- 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 <u>all</u> 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.