

## Statement of Basis For Title V Permit

Company Name	Akron Regional Landfill	
Premise Number	16-77-01-0976	
What makes this facility a Title V facility?	40 CFR Part 60 Subpart WWW applicability	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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)	PTI 16-02162 allowed for an increase in waste dumping prior to the landfill closing date. PTI 16-02128 - new insignificant leachate storage tank. Added authority citations. PTI 16-1480 replaced by PTI 16-02162. All BAT terms moved to the State/federal side. Added Air Toxics language. Revised insignificant emissions unit language.	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	

A.1	77-07(A)(13)		Insignificant emissions unit T001 has an applicable PTI.

**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.

<b>Part III (Requirements Within the State &amp; Federally Enforceable Section)</b>															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
F002	200 tpy particulate	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	<p>M, R, Rp: The annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.</p> <p>Et: This is a fugitive emissions source, only way to demonstrate compliance would be through calculations using AP-42 emission factors.</p>

F002	no visible emissions except for one minute during any 60-minute period (paved roadways)	31-05(A)(3)		N	N	Y	N	N	N	N	Y	N	N	N	Et: None normally required for opacity alone.
F002	no visible emissions except for 3 minutes during any 60-minute period (unpaved roadways)	31-05(A)(3)		N	N	Y	N	N	N	N	Y	N	N	N	Et: None normally required for opacity alone.
P902	7.73 tpy non methane organic compounds NMOC (fugitive)	31-05(A)(3)		N	N	N	N	N	Y	N	Y	N	N	N	M: Compliance with the limitation is demonstrated using US EPA's "Landfill Gas Emissions Model" software.  Et: Fugitive emissions source. Compliance with the limitation is demonstrated using US EPA's "Landfill Gas Emissions Model" software.
P902	1,282 tpy methane (CH <sub>4</sub> ) (fugitive)	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, Et: Compliance with the limitation is demonstrated using US EPA's "Landfill Gas Emissions Model" software.
P902	6.18 tpy VOC (fugitive)	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, Et: Compliance with the limitation is demonstrated using US EPA's "Landfill Gas Emissions Model" software. Fugitive VOC emission rate is equal to 80% of the NMOC emissions.
P902	1.16 tpy combined HAPs (fugitive)	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, Et: Compliance with the limitation is demonstrated using US EPA's "Landfill Gas Emissions Model" software. Fugitive HAP emission rate is equal to 15% of the NMOC emissions.
P902	91 tpy TSP (fugitive)	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, Et: The annual fugitive emission limitation was established in the PTI to represent potential emissions of an open landfill using AP-42 emission factors. Landfill is now closed and cells are covered with vegetation.

P902	29 tpy PM-10 (fugitive)	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, Et: The annual fugitive emission limitation was established in the PTI to represent potential emissions of an open landfill using AP-42 emission factors. Landfill is now closed and cells are covered with vegetation.
P902	0.18 lb/hr NMOC (flare) 0.79 tpy NMOC (flare)	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	Et: Initial stack test was conducted to demonstrate compliance with 40 CFR 60.18. NMOC emissions can be predicted using USEPA Landfill Emissions Model (LandGEM).
P902	33.2 lbs/hr CH <sub>4</sub> (flare) 145.4 tpy CH <sub>4</sub> (flare)	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	Et: Initial stack test was conducted to demonstrate compliance with 40 CFR 60.18. NMOC emissions can be predicted using USEPA Landfill Emissions Model (LandGEM).
P902	0.24 lb/hr VOC (flare) 1.04 tpy VOC (flare)	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	Et: Initial stack test was conducted to demonstrate compliance with 40 CFR 60.18. NMOC emissions can be predicted using USEPA Landfill Emissions Model (LandGEM).
P902	0.85 lbs/hr PM-10 (flare) 3.75 tpy PM-10 (flarE)	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	Et: None - per Ohio EPA Engineering Guide 16
P902	1.05 lb/hr sulfur dioxide (SO <sub>2</sub> ) (flare) 4.60 tpy SO <sub>2</sub> (flare)	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	Et: None - per Ohio EPA Engineering Guide 16, mass balance calculation can calculate the emissions based upon the sulfur concentration available to react in the landfill.
P902	3.71 lb/hr NO <sub>x</sub> (flare) 16.26 tpy NO <sub>x</sub> (flare)	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	Et: Nitrogen level was determined in an initial stack test using Method 3C of 40 CFR Part 60 Appendix A. Emission factors then used to calculate emission rate.

P902	20.2 lb/hr CO (flare)  88.48 tpy CO (flare)	31- 05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	Et: Emission rate can be calculated based on the design methane concentration of the landfill and the heating value of methane.
P902	0.60 lb/hr HCL (flare)  2.61 tpy HCL (flare)	31- 05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	Et: None - per Ohio EPA Engineering Guide 16, mass balance calculation can calculate the emissions based upon the chlorine concentration available to react in the landfill.
P902	methane concentrati on from the collection system shall be less than 500 ppm above backgroun d at the surface of the landfill		40 CFR Part 60, Subp art WW W	N	N	Y	N	N	Y	N	Y	N	Y	N	
P902	no visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecuti ve hours		40 CFR Part 60, Subp art WW W	N	N	Y	N	N	Y	N	Y	N	N	N	Et: None normally required for opacity alone.

EU = emissions unit ID

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

OR = operational restriction

M = monitoring requirements

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

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements  
Rp = reporting requirements  
ET = emission testing requirements (not including compliance method terms)  
Misc = miscellaneous requirements

C **Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

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

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

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. 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.