



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

06/30/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

15-76-00-1579
Countywide Recycling and Disposal Facility
Tim Vandersall
3619 Gracemont Street Southwest
East Sparta, OH 44626

Dear Tim Vandersall:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Canton Division of Air Pollution Control within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

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 or comments concerning this draft Title V permit, please contact Canton Division of Air Pollution Control.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Canton Division of Air Pollution Control
Pennsylvania
West Virginia



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 06/30/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Countywide Recycling and Disposal Facility
3619 Gracemont Avenue Southwest
East Sparta, OH 44626

of a Title V permit for Facility ID: 15-76-00-1579

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

F001 (Facility Roadways)

Vehicle travel on facility roadways

F002 (Landfill Operations)

Landfill operation including the generation of gas in the landfill, waste compaction, and material handling associated with overburden and daily cover.

F004 (Solid Waste Storage Piles)

Sawdust or other suitable mixing agent and select solid wastes storage piles associated with emissions unit F005

F005 (Liquid Waste Solidification)

Mixing of non-hazardous liquid wastes with absorbent solid wastes in the mixing tank to produce solid wastes

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 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, 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.
- 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting

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

- 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 are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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.

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.

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. 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.

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.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency 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 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.

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.

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).

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.

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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. 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 quarterly, i.e., 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.)

3. 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.

4. 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.

5. 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).

6. 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.

7. 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.

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

If no 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

G001 - diesel fuel dispensing facility
T001 - dust suppressant storage tank, 1,700 gallons
T002 - hydraulic oil storage tank, 650 gallons
T003 - engine oil storage tank, 650 gallons
T004 - hydraulic oil storage tank, 650 gallons
T005 - engine oil storage tank, 650 gallons
T006 - hydraulic oil storage tank, 490 gallons
T007 - anti-freeze storage tank, 490 gallons
T008 - waste oil storage tank, 490 gallons
L001 - solvent metal cold cleaner
Z003 - leachate storage

Each individual insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations/control requirements contained within a Permit To Install for the emissions unit.

2. The permittee shall not initiate or allow any salvage operations to be conducted at this location without prior written approval of the Ohio EPA.
3. The permittee shall not accept any asbestos or asbestos-containing waste material that is subject to the provisions of the NESHAP, 40 CFR Part 61, Subpart M. No such asbestos or asbestos-containing waste material may be accepted without first applying for and obtaining a Permit to Install from the Ohio EPA.
4. The permittee shall not cause or allow any open burning in violation of OAC Chapter 3745-19 at this facility.
5. The owner or operator of this facility shall not install any air contaminant source, including a landfill gas-fired boiler or generator, without first obtaining a Permit to Install from the Ohio EPA.
6. 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 such an odor is detected at the property line, the permit holder and operator shall institute reasonable mitigation measures. Odor mitigation measures deemed appropriate by the Director to protect the comfort, repose, health or safety of the public shall be implemented by the permit holder upon the written request of the City of Canton Health Department, Air Pollution Control Division.
7. 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: Facility Roadways (F001)
Activity Description: Vehicle travel on facility roadways

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paved (Entrance Road) and unpaved roadways (Haul Roads) and parking areas (Fugitive Emissions)	None	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a There are no applicable emissions limitations/control measures from OAC rule 3745-17-08 because the facility is not located in an Appendix A area as defined in this rule.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paved (Entrance Road) and unpaved roadways (Haul Roads) and parking areas (Fugitive Emissions)	OAC 3745-31-05 PTI 15-679 issued 08/21/91	15.5 TPY PM See the following Additional Terms and Conditions.

2. Additional Terms and Conditions

- 2.a Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times.
- 2.b If mud or dirt is deposited onto Gracemont Street, it shall be removed and disposed of properly as soon as possible, but at least by the end of each workday.
- 2.c The facility's permanent entrance road shall include at least 2700 feet of paved roadway with rumble strips.
- 2.d A maximum speed limit of 25 miles per hour shall be posted and enforced on the paved roadways and parking areas of the property, and also on the paved facility-controlled access roads.
- 2.e All paved roadways and parking areas shall be flushed with water and swept to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic.
- 2.f The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.g A maximum speed limit of 25 miles-per-hour shall be posted and enforced on the unpaved roadways and parking areas of the property, and also on the unpaved facility-controlled access roads.
- 2.h The permittee shall apply dust suppressants to the unpaved roadways and parking areas to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic. Water or dust suppressant solutions shall be used as the dust suppressant, and the following equipment shall be used for the periodic applications: company operated and maintained truck mounted spray system.
- 2.i A wheel and undercarriage washing station shall be operated on the permanent entrance road. The tires and undercarriages of all vehicles exiting unpaved landfill roadways shall be washed, as necessary, with high pressure water, prior to leaving the facility to prevent the carryover of dust or mud onto paved roadways.
- 2.j The unpaved shoulders of all paved roadways shall be treated with water and/or any other suitable dust suppression chemicals to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic.
- 2.k Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be considered as a paved roadway or parking area, and controlled with the control measure specified above for paved surfaces.

2. Additional Terms and Conditions (continued)

- 2.1 The control measures in Additional Terms and Conditions B.1.2.2b, B.1.2.2e, B.1.2.2f, B.1.2.2h, B.1.2.2i, and B.1.2.2j of emissions unit F001 above shall be implemented at frequencies that will minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic, and the needed frequencies of implementation shall be determined by the permittee's inspections. For the above Additional Terms and Conditions, if a particular inspection reveals a condition for which a corrective action is required, the corrective action shall be completed on the same day as the inspection was performed. It is further understood that on any specific day implementation of the control measures in Additional Terms and Conditions B.1.2.2e, B.1.2.2f, B.1.2.2h, B.1.2.2i (for B.1.2.2i, only if the roadways are covered with snow and/or ice), B.1.2.2j, and B.1.2.2k of emissions unit F001 above shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

Paved roadways and parking areas:

(by group or individually)

Minimum inspection frequency:

Daily, by 12:00 Noon, on days of operation only.

Unpaved roadways and parking areas:

(by group or individually)

Minimum inspection frequency:

Twice daily, by 12:00 Noon and by the end of the day, on days of operation only.

The purpose of the inspections is to determine the need for implementing the control measures in Additional Terms and Conditions B.1.1.2.2a, B.1.1.2.2b, B.1.2.2e, B.1.2.2f, B.1.2.2h, B.1.2.2i, and B.1.2.2j of emissions unit F001 above. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic, except for Additional Term and Condition B.1.1.2.2b of emissions unit F001. 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.

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 minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.

2. The permittee shall maintain records of the following information:
- 2.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;
- 2.b the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

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

- 2.c** the dates the control measures were implemented, the control measures that were implemented, and an identification of the sections of the paved and unpaved roadways and parking lots on which the control measures were implemented; and
- 2.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.

The information required in B.III.2.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- 3.** The permittee shall maintain daily records of the following information (for use in proving compliance with the annual, allowable, PM emission limitation of 15.5 TPY):
 - 3.a** for vehicle travel on paved surfaces, the number of miles traveled per day by each of the following size/type of vehicles: 4-wheeled gasoline powered; 10-wheeled gasoline powered; 12-wheeled diesel powered; and, 18-wheeled diesel powered; and,
 - 3.b** for vehicle travel on unpaved surfaces, the number of miles traveled per day by each of the following sizes of vehicles: 4-wheeled gasoline powered; 10-wheeled gasoline powered; 12-wheeled diesel powered; and 18-wheeled diesel powered.

IV. Reporting Requirements

- 1.** The permittee shall submit deviation reports that identify any of the following occurrences:
 - 1.a** each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation;
 - 1.b** each instance when a control measure that was to be implemented as a result of an inspection was not implemented; and
 - 1.c** each instance when a control measure was not implemented which is required by Additional Term and Condition B.I.2.2a, B.I.2.2b, B.I.2.2e, B.I.2.2f, or B.I.2.2.h, B.I.2.2.i, and B.I.2.2.j.
- 2.** The deviation reports shall be submitted in accordance with paragraph B.2.b. of the General Terms and Conditions.
- 3.** If there are no deviations during a calendar quarter that must be reported pursuant to Section B.IV., the permittee shall submit a quarterly report, in accordance with paragraph B.8 of the General Terms and Conditions, which states that no deviations occurred during that quarter.
- 4.** The permittee shall submit annual PM emissions reports by January 31 of every year covering the previous calendar year's PM emissions. Each report shall contain:
 - 4.a** a title and the calendar year which the report covers;
 - 4.b** the actual, annual PM emissions in TPY from the paved surfaces;
 - 4.c** the actual, annual PM emissions in TPY from the unpaved surfaces;
 - 4.d** the actual, annual PM emissions in TPY from all the surfaces;
 - 4.e** the number of miles traveled on paved surfaces during the calendar year by 4-wheeled, gasoline-powered vehicles;
 - 4.f** the number of miles traveled on paved surfaces during the calendar year by 10-wheeled, gasoline-powered vehicles;
 - 4.g** the number of miles traveled on paved surfaces during the calendar year by 12-wheeled, diesel-powered vehicles;

IV. Reporting Requirements (continued)

- 4.h the number of miles traveled on paved surfaces during the calendar year by 18-wheeled, diesel-powered vehicles;
- 4.i the number of miles traveled on unpaved surfaces during the calendar year by 4-wheeled gasoline powered vehicles;
- 4.j the number of miles traveled on unpaved surfaces during the calendar year by 10-wheeled gasoline powered vehicles;
- 4.k the number of miles traveled on unpaved surfaces during the calendar year by 12-wheeled diesel powered vehicles; and
- 4.l the number of miles traveled on unpaved surfaces during the calendar year by 18-wheeled diesel powered vehicles.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation:
15.5 TPY PM

Applicable Compliance Method:
Total Emissions = Paved Emissions + Unpaved Emissions

Paved Emissions:
The emission factor is a function of the size and type of the vehicle.

The controlled emission factors for 4-wheeled, gasoline-powered vehicles, 10-wheeled, gasoline-powered vehicles, 12-wheeled, diesel-powered vehicles, and 18-wheeled, diesel-powered vehicles are respectively, 0.0022, 0.0056, 0.0068, and 0.0099 lb PM emitted/vehicle mile traveled. The sum of the emission factor times the number of vehicle miles that each of the 4 types of vehicles traveled on paved surfaces per calendar year is equal to the paved emissions in lbs PM emitted/year.

The emission factors were developed from the Ohio EPA publication, Reasonably Available Control Measures for Fugitive Dust Sources (RACM), Supplement #1, 1983, Equation 1, on page 2-8, the exhaust emissions from Table 2.1.1-1 on page 2-9, and a control efficiency for weekly water flushing of 80% from page 2-15.

V. Testing Requirements (continued)

Unpaved Emissions:

The emission factor is a function of the number of tires on the vehicle, T.

The controlled emission factor is equal to $0.1556 \times T$, with units of lbs PM emitted per vehicle mile traveled. The controlled emissions for 4-wheeled vehicles in units of lbs PM emitted per calendar year is equal to $0.1556 \times 4 \times$ the number of vehicle miles traveled by 4-wheeled vehicles in the calendar year. The controlled emissions for the 10-, 12-, and 18-wheeled vehicles are calculated similarly to the 4-wheeled vehicles. The sum of the controlled emissions for the 4-, 10-, 12-, and 18-wheeled vehicles is equal to the unpaved emissions in lbs PM emitted per calendar year.

The controlled emission factor equation was developed from the Ohio EPA publication, RACM, Supplement #1, 1983, Equation 2, on page 2-10, with P, the fraction of particulate which will remain suspended, equal to 0.62 for a gravel roadbed; with s, the silt content of the roadbed material, equal to 6.4% (from AP-42, EPA's Compilation of Air Pollution Emission Factors, Fifth Edition, Table 13.2.2-1, page 13.2.2-2, for municipal solid waste landfills); with S, the average vehicle speed, equal to 20 mph; with W, the number of days with more than 0.01 inch of precipitation per year, equal to 153, from NWS data from the Akron-Canton Regional Airport, and with a control efficiency for watering of 50% from Table 2.2.2-3 on page 2-16.

To obtain the calculated, annual PM emissions in tons per year (Total Emissions), sum the paved emissions and the unpaved emissions (both in units of lbs PM emitted/year) and multiply this sum by 1 Ton/2000 lbs. The Total Emissions must be less than or equal to 15.5 TPY PM for compliance to be met.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Landfill Operations (F002)

Activity Description: Landfill operation including the generation of gas in the landfill, waste compaction, and material handling associated with overburden and daily cover.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Material handling operations for the landfill disposal of Municipal Solid Waste (MSW) (fugitive emissions). The following operations pertaining to the landfill gases: the active collection of landfill gases, disposal of landfill gases with an open flare, and the routing of the collected gas to a treatment system that processes the collected gas for subsequent sale or use.	40 CFR Part 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills.	See A.I.2.a through c. below.

2. Additional Terms and Conditions

- 2.a The active 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.b The collected gas shall be vented to an open flare designed and operated as follows:
 - i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
 - ii. The flare shall be operated with a flame present at all times.
 - iii. The permittee shall comply with either the requirements in paragraphs (a) and (b) or the requirements in paragraph (c) below:

2. Additional Terms and Conditions (continued)

(a) Flares shall be used only with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or with the net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater if the flare is non-assisted. The net heating value of the gas being combusted shall be determined as follows:

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

Where

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

k = constant, 1.740×10^{-7} (1/ppm) (g mole/scm) (MJ/kcal)
where the standard temperature for (g mole/scm) is 20 degrees C.

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

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

2. Additional Terms and Conditions (continued)

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

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

(ii) a steam-assisted and non-assisted flare shall be designed for and operated with an exit velocity of less than the velocity, V_{max} , and less than 122 m/sec (400 ft/sec) are allowed; as determined by

$$\text{Log}_{10}(V_{max}) = (Ht + 28.8)/31.7$$

where

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

28.8 = constant

31.7 = constant

Ht = the net heating value as determined in section A.I.2.2.b.iii.a. above

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

$$V_{max} = (X_{h2} - K1) * K2$$

where:

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

K1 = constant, 6.0 volume-percent hydrogen

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

X_{h2} = the volume-percent of hydrogen, on a wet basis, as calculated by using the American Society for Testing and Materials (ASTM) Method D1946-77

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

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

where

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

8.706 = constant

0.7084 = constant

Ht = the net heating value as determined in section A.I.2.2.b.iii.a. above

2. Additional Terms and Conditions (continued)

- 2.c** 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 be no longer 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.

II. Operational Restrictions

1. The permittee shall operate the collection system such that gas 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.
2. 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.)
 - 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.)
3. 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 or significantly inhibit anaerobic decomposition by killing methanogens.
4. 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.
5. The permittee shall operate the collection system such that all collected gases are vented to a control system designed and operated in compliance with A.1.2.2.b. 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.
6. The permittee shall operate the flare at all times when the collected gas is routed to the system.
7. A pilot flame shall be maintained at all times in the flare's pilot light burner.
8. The permittee shall not accept or dispose of any "asbestos material" as defined in OAC 3745-20-01 or asbestos-containing waste material as defined in 40 CFR 61.141 containing more than 1 percent asbestos as determined using the methods specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy. The receipt or disposal of any asbestos or asbestos-containing waste without proper approval of the Ohio EPA is a violation of the NESHAPS for asbestos and the Ohio EPA Permit to Install rules.

III. Monitoring and/or Record Keeping Requirements

1. For the active gas collection system, the permittee shall install a sampling port and a thermometer or other temperature measuring device at each wellhead and record the following information on a monthly basis:
 - a. the gauge pressure in the gas collection header at each individual well;
 - b. the nitrogen or oxygen concentration in the landfill gas; and
 - c. the temperature of the landfill gas.
2. The permittee shall monitor surface concentrations of methane on a quarterly basis as follows:
 - a. Monitor surface concentrations of methane along the entire perimeter of the collection area and along a serpentine pattern spaced 30 meters apart (or a site-specific established spacing) for each collection area.
 - b. The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.
 - c. Surface emission monitoring shall be performed in accordance with section 4.3.1 of Method 21 of Appendix A of 40 CFR Part 60, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.
 - d. Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the actions specified below shall be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements listed in A.II.4.:
 - i. The location of each monitored exceedance shall be marked and the location recorded.
 - ii. Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be remonitored within 10 calendar days of detecting the exceedance.
 - iii. If the remonitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be monitored again within 10 days of the second exceedance. If the remonitoring shows a third exceedance for the same location, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Ohio EPA for approval. No further monitoring of that location is required until the action specified has been taken.
 - iv. Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day remonitoring specified above shall be remonitored 1 month from the initial exceedance. If the 1-month remonitoring shows a concentration less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month remonitoring shows an exceedance, the actions specified above shall be taken.
3. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:
 - a. a heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame; and
 - b. a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes.
4. If a gas flow rate measuring device is not installed, then the permittee shall secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

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

5. The permittee shall maintain the following information for the life of the control equipment as measured during the initial performance test or compliance demonstration:

a. The maximum expected gas generation flow rate as calculated based on the following:

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

$$Q_m = 2L_o \times R \times \{(e \text{ to the power } -kc) - (e \text{ to the power } -kt)\}$$

where,

Q_m = maximum expected gas generation flow rate, cubic meters per year

L_o = methane generation potential, cubic meters per megagram solid waste

R = average annual acceptance rate, megagrams per year

k = methane generation rate constant, per year

t = age of the landfill, in years, at equipment installation plus the time the owner or operator intends to use the gas mover equipment or active life of the landfill, whichever is less (If the equipment is installed after closure, t is the age of the landfill at installation)

c = time since closure, years (for an active landfill $c = 0$ and $(e \text{ to the power } -kc) = 1$)

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

$$Q_m = \text{Summation of } 2kL_oM_i \times (e \text{ to the power } -kt_i \text{ for } i=1 \text{ through } i=n)$$

where,

Q_m = maximum expected gas generation flow rate, cubic meters per year

k = methane generation rate constant, per year

L_o = methane generation potential, cubic meters per megagram solid waste

M_i = mass of solid waste in the i 'th section, megagrams

t_i = age of the i 'th section, years

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

- iii. If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, the equations in paragraphs A.III.5.i. and ii. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using the equations in paragraphs A.III.5.i. or ii or other methods shall be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment. (The permittee may use another method to determine the maximum gas generation flow rate if the method has been approved by the Ohio EPA.);
 - b. the density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR Part 60.759(a)(1);
 - c. the flare type (i.e., steam-assisted, air-assisted, or non-assisted);
 - d. all visible emission readings;
 - e. heat content determinations of the gas;
 - f. flow rate or bypass flow rate measurements;
 - g. exit velocity determinations made during the performance test as specified in 40 CFR Part 60.18; and
 - h. continuous records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the flare pilot flame or flare flame is absent.
6. The permittee shall properly install, operate, and maintain a device to continuously monitor the flare pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record the following information each day:

- a. all periods during which there was no pilot flame;
 - b. the downtime for the flare and monitoring equipment when the collection and control system is in operation.
7. The permittee shall maintain, for the life of the collection system, an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector.
8. The permittee shall keep for at least 5 years, up-to-date, readily accessible, on-site records of the maximum design capacity of the landfill, the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either hardcopy or electronic formats are acceptable. These records may also be required by the OEPA, Division of Solid and Infectious Waste Management, and shall satisfy this permit condition.
9. The permittee shall conduct surface testing around the perimeter of the collection area along a pattern that traverses the landfill at 30-meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover.

IV. Reporting Requirements

1. Any breakdown or malfunction of the landfill gas collection and control system resulting in the emission of raw landfill gas emissions to the atmosphere shall be reported to the Canton City Health Department, Air Pollution Control Division, 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.

IV. Reporting Requirements (continued)

2. The permittee shall submit an NMOC annual emission rate report to the Canton City Health Department, Air Pollution Control Division. The report shall include all the data, calculations, sample reports and measurements used to estimate the annual emissions.
3. The permittee shall submit a closure report to the Canton City Health Department, Air Pollution Control Division, within 30 days of waste acceptance cessation. The Canton City Health Department, Air Pollution Control Division may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR Part 258.60. If a closure report has been submitted to the Canton City Health Department, Air Pollution Control Division, no additional wastes may be placed into the landfill without filing a notification of modification as described in 40 CFR Part 60.7(a)(4).
4. The permittee shall submit an equipment removal report to the Canton City Health Department, Air Pollution Control Division, 30 days prior to removal or cessation of operation of the control equipment. The equipment removal report shall contain the information specified in 40 CFR Part 60.757(e)(1). The Canton City Health Department, Air Pollution Control Division, may request additional information as may be necessary to verify that all of the conditions for removal in 40 CFR Part 60.752(b)(2)(v) have been met.
5. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. any record which indicates that the gauge pressure in the gas collection header at each individual well was positive;
 - b. any record which indicates that the nitrogen or oxygen concentration in the landfill gas was greater than 20% or 5%, respectively;
 - c. any record which indicates that the temperature of the landfill gas was greater than 55 degrees Celsius;
 - d. any record which indicates that the surface concentration of methane was greater than 500 parts per million above background;
 - e. all periods during which the flare pilot flame was not functioning properly (the reports shall include the date, time, and duration of each such period); and
 - f. all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow or any record which indicates that the bypass line valve was not maintained in the closed position.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

6. The permittee shall submit annual reports which include the following:
 - a. all periods when the collection system was not operating in excess of 5 days; and
 - b. any record indicating the date of installation and the location of each well or collection system expansion added pursuant to 40 CFR Part 60.755(a)(3), (b), and (c)(4).

These reports shall be submitted by January 31 of each year.

IV. Reporting Requirements (continued)

7. The permittee shall submit the following information with the initial performance test report required pursuant to 40 CFR Part 60.8:
 - a. a diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for the future collection system expansion;
 - b. the data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based;
 - c. the documentation of the presence of asbestos or nondegradable material for each area from which collection wells have been excluded based on the presence of asbestos or nondegradable material;
 - d. the sum of the gas generation flow rate for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area;
 - e. the provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill; and
 - f. the provisions for the control of off-site migration.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emissions Limitation:
No visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:
Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.
 - 1.b 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).
 - 1.c 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:
 - i. the span shall be set so that the regulatory limit is between 20 and 50% of the span;
 - ii. a data recorder is not required;
 - iii. only two calibration gases are required, a zero and span, and ambient air may be used as the span;
 - iv. a calibration error check is not required; and
 - v. the allowable sample bias, zero drift, and calibration drift are plus or minus 10%.
2. The permittee shall conduct or have conducted, within 90 days after the installation of the collection and control system, an initial performance test to demonstrate that the flare can operate in conformance with the requirements specified in 40 CFR Part 60.18. The net heating value of the gas being combusted in the flare and the actual exit velocity of the flare shall be determined in accordance with the procedures and methods specified in 40 CFR Part 60.18. The visible emission evaluation shall be conducted in accordance with the procedures specified in Section A.V.1.a.

V. Testing Requirements (continued)

3. 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).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Material handling operations for the landfill disposal of Municipal Solid Waste (MSW) (fugitive emissions). The following operations pertaining to the landfill gases: the active collection of landfill gases, disposal of landfill gases with an open flare, and the routing of the collected gas to a treatment system that processes the collected gas for subsequent sale or use.	OAC 3745-31-05 PTI # 15-679 issued 8/21/91	5.0 TPY PM The landfill areas that are covered by this permit and subject to PTI 15-679 emissions limitations and control measures consist of all landfill areas where MSW is deposited.
	OAC 3745-31-05 PTI # 15-1305 issued 02/04/98	Use of reasonably available control measures, as defined in additional terms and conditions B.1.2.a, 2.b, 2.c, 2.d and 2.e to minimize or eliminate the emissions of fugitive dust. 36.7 lbs CO/Hr 161 TPY CO 6.49 lbs NOx/Hr 28.5 TPY NOx 0.53 lb SO2/Hr 2.30 TPY SO2 2.52 lbs HCl/Hr 11.1 TPY HCl 1.10 lbs NMOC/Hr 4.80 TPY NMOC 0.30 PM/Hr 1.31 TPY PM

2. Additional Terms and Conditions

2.a The permittee shall ensure that solid wastes are deposited, spread and compacted in such a manner as to minimize or prevent visible emissions of dust. All vehicles hauling wastes shall be closed, covered, or tarped entering or leaving the facility in order to minimize or eliminate load loss. All truckloads of solid waste shall be unloaded in a manner which shall minimize the drop height of the solid wastes. Any dusty materials or wastes likely to become airborne shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate visible emissions of fugitive dust. Watering shall be conducted in such a manner as to avoid the pooling of liquids and runoff. No dusty material shall be dumped during periods of high wind speed (>20 MPH), unless the material has been treated to prevent fugitive dust emissions from becoming airborne.

In accordance with the permittee's permit application, the permittee has committed to minimizing drop heights and watering of dusty materials, either prior to dumping or during dumping, and good operating practices to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b The "Dusty Load Handling Procedures" described in the January 31, 1995 letter from Mr. Greg Terwilliger of Countywide Recycling and Disposal facility to Mr. Rick Miller of the Canton City Health Department, Air Pollution Control Division shall be employed to minimize or eliminate fugitive dust emissions.

Any dusty material to be stored prior to disposal shall be watered, as necessary, or have a temporary soil cover in order to minimize or eliminate visible emissions of fugitive dust.

2.c The above-mentioned control measures shall be employed for each MSW landfill cell 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 minimize or eliminate fugitive dust emissions. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.

2.d The permittee shall employ reasonably available control measures for wind erosion from the surface of the landfill 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 watering, as necessary, to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The above-mentioned control measures shall be employed for wind erosion from the landfill if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to minimize or eliminate fugitive dust emissions. Implementation of the control measure(s) shall not be necessary for the landfill cell that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate fugitive dust emissions.

2.f Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of PTI 15-679, issued 08/21/91.

2.g All landfill areas where solid wastes are deposited are subject to the above-mentioned requirements.

II. Operational Restrictions

- 1.** The permittee shall be limited to inputting to the flare less than or equal to 3,500 dscf of landfill gas per minute and 1,840 million dscf of landfill gas per year.
- 2.** If an alternate use of the landfill gas becomes available, the flare shall be maintained as a backup landfill gas system after any necessary permits are obtained in accordance with general term and condition B.1.

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall maintain a wind speed indicator to determine whether the wind is in excess of the 20 MPH limit.
- 2.** The permittee shall maintain monthly records of the amount of landfill gas, in scf, inputted to the flare and the number of hours that the flare was operated.

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

3. The permittee shall maintain monthly records of any malfunctions when unburned landfill gas was released from the flare.
4. The records required under the preceding three paragraphs shall be maintained in a bound logbook at the facility for a period of five years and shall be available for review by the Administrator, the Director, or their representatives during normal business hours at the facility.
5. Except as otherwise provided in this section, the permittee shall perform inspections of the landfill operation areas in accordance with the following frequencies:

landfill areas	minimum inspection frequency
all landfill areas	daily

6. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for PM. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a landfill operating area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
7. The permittee may, upon receipt of written approval from the Canton City Health Department, Air Pollution Control Division, 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.
8. 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.

The information required in 8.d. shall be kept separately for (i) the solid waste load-in operations, (ii) the surface working operations, and (iii) the cell surface (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. An annual report shall be submitted by this facility to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544. This report shall be submitted by February 1 of each year and shall address the data obtained during the previous year. This report shall contain the amount of landfill gas input to the flare and the actual, annual NMOC emissions in TPY. The report shall include all the data, calculations, sample reports, and measurements used to estimate the actual, annual emissions.

IV. Reporting Requirements (continued)

2. Drawings of the landfill gas collection system, as built, shall be submitted to the Canton City Health Department, Air Pollution Control Division within 90 days of the date of the issuance of this permit, and such drawings shall also be maintained at the facility. The drawings shall include locations of the wells and trenches, well depths, pipe lengths, pipe diameters, condensate traps, the layout of the system, and any other relevant information.
3. The permittee shall submit deviation reports that identify any of the following occurrences:
 - 3.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,
 - 3.b each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

V. Testing Requirements

1. Compliance with the emission limitations in Section B.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emissions Limitation:
5.0 TPY PM for the material handling operations for the landfill disposal of MSW

Applicable Compliance Method -

Utilize the RACM emission factor of 0.046 ton PM emitted per acre per year (RACM pg 2-79, Equation 1, mineral extraction, wind erosion from topsoil). The maximum acreage to be utilized is 3, per the permit application.

The calculated annual amount of tons of PM emitted = (0.048 ton PM/acre-year) (3 acres) = 0.144 Ton

Compliance is shown because the calculated annual PM emissions (0.144 TPY) was less than or equal to the allowable annual PM emissions (5.0 TPY).

- 1.b Emissions Limitation:
36.7 lbs CO/hour

Applicable Compliance Method -

Compliance shall be determined utilizing Method 10 of 40 CFR Part 60, Appendix A. See section B.V.2.

- 1.c Emissions Limitation:-
161 TPY CO

Applicable Compliance Method -

Utilize the measured hourly CO emission rate from above and multiply by 8760 hours of operation/year and 1 ton/2000 pounds to obtain the yearly CO emissions in tons.

Compliance will be shown if the the calculated annual CO emissions are less than or equal to the allowable annual CO emissions (161 tons).

- 1.d Emission Limitation -
6.49 lbs NOx/hour

Applicable Compliance Method -

Compliance shall be determined utilizing Method 7 of 40 CFR Part 60, Appendix A. See section B.V.2.

V. Testing Requirements (continued)

- 1.e** Emissions Limitation:
28.5 TPY NO_x

Applicable Compliance Method -

Utilize the measured hourly NO_x emission rate from above and multiply by 8760 hours of operation/year and 1 ton/2000 pounds to obtain the yearly NO_x emissions in tons.

Compliance will be shown if the the calculated annual NO_x emissions are less than or equal to the allowable annual NO_x emissions (28.5 tons).

- 1.f** Emissions Limitation:
0.53 lb SO₂/hour

Applicable Compliance Method -

Compliance shall be determined utilizing Method 6 of 40 CFR Part 60, Appendix A. See section B.V.2.

- 1.g** Emissions Limitation:
2.30 TPY SO₂

Applicable Compliance Method -

Utilize the measured hourly SO₂ emission rate from above and multiply by 8760 hours of operation/year and 1 ton/2000 pounds to obtain the yearly SO₂ emissions in tons.

Compliance will be shown if the the calculated annual SO₂ emissions are less than or equal to the allowable annual SO₂ emissions (2.30 tons).

- 1.h** Emissions Limitation:
2.52 lbs HCl/hour

Applicable Compliance Method -

Compliance shall be determined utilizing Method 26 of 40 CFR Part 60, Appendix A. See section B.V.2.

- 1.i** Emissions Limitation:
11.1 TPY HCl

Applicable Compliance Method -

Utilize the measured hourly HCl emission rate from above and multiply by 8760 hours of operation/year and 1 ton/2000 pounds to obtain the yearly HCl emissions in tons.

Compliance will be shown if the the calculated annual HCl emissions are less than or equal to the allowable annual HCl emissions (11.1 tons)

- 1.j** Emissions Limitation:-
1.21 lbs NMOC/hour

Applicable Compliance Method -

Compliance shall be determined utilizing Method 25 of 40 CFR Part 60, Appendix A. See section B.V.2.

- 1.k** Emissions Limitation:-
4.80 TPY NMOC

Applicable Compliance Method -

Utilize the measured hourly NMOC emission rate from above and multiply by 8760 hours of operation/year and 1 ton/2000 pounds to obtain the yearly NMOC emissions in tons.

V. Testing Requirements (continued)

- 1.l** Emission Limitation -
0.30 lb PM/hour

Applicable Compliance Method -

Compliance shall be determined utilizing Methods 1 through 5 of 40 CFR Part 60, Appendix A. See section B.V.2.

- 1.m** Emissions Limitation:
1.31 TPY PM

Applicable Compliance Method -

Utilize the measured hourly PM emission rate from above and multiply by 8760 hours of operation/year and 1 ton/2000 pounds to obtain the yearly PM emissions in tons.

- 2.** Emission testing requirements

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

- 2.a** The emission testing shall be conducted within 3 months of the issuance of this permit and within 2 years to 1 year prior to permit renewal.
- 2.b** The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for CO, NOx, SO2, HCl, NMOC and PM for the first emission test (within 3 months of the issuance of this permit). The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for CO and NOx for the second emission test (within 2 years to 1 year prior to permit renewal).
- 2.c** The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for CO, Method 10 of 40 CFR Part 60, Appendix A; for NOx, Method 7 of 40 CFR Part 60, Appendix A; for SO2, Method 6 of 40 CFR Part 60, Appendix A; for HCl, Method 26 of 40 CFR Part 60, Appendix A, for NMOC, Method 25 of 40 CFR Part 60, Appendix A; and, for PM, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- 2.d** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, Air Pollution Control Division 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 Canton City Health Department, Air Pollution Control Division.

VI. Miscellaneous Requirements

1. The equipment associated with this emissions unit shall be operated and maintained by personnel properly trained in its operation.
2. The utility flare shall be designed, installed, and operated in accordance with the Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 60.750 to 60.759, as indicated in these Terms and Conditions, in accordance with 40 CFR 60.18 (b) to (f), and in accordance with the PTI 15-1305 application.
3. Design, construction, and siting of the gas extraction wells and collection system shall be in accordance with the PTI 15-1305 application, PTI 15-1305, the Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 60.750 to 60.759 as indicated in these Terms and Conditions and with standard industry methods and practices currently in use.
4. Any section of landfill material exposed during construction shall be covered as soon as possible once construction of that section is complete.
5. During construction, all working areas, construction spoils and unpaved roadways associated with the emissions unit shall be watered down to minimize dust.
6. The permittee shall not accept NESHAPS regulated asbestos-containing material for disposal.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Solid Waste Storage Piles (F004)

Activity Description: Sawdust or other suitable mixing agent and select solid wastes storage piles associated with emissions unit F005

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
The storage piles consist of a mixing agent storage pile and a select solid waste storage pile and include the following operations: truck unloading, load in and load out of such materials to the piles, and the operation of the front end loader during these operations. The mixing agents may include sawdust or other suitable dry materials	None	See section A.I.2.a.

2. Additional Terms and Conditions

- 2.a There are no applicable emissions limitations/control measures from OAC rule 3745-17-08 because the facility is not located in an Appendix A area as defined in this rule.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>The storage piles consist of a mixing agent storage pile and a select solid waste storage pile and include the following operations: truck unloading, load in and load out of such materials to the piles, and the operation of the front end loader during these operations. The mixing agents may include sawdust or other suitable dry materials.</p>	<p>OAC 3745-31-05 PTI #15-1282 issued March 26, 1997</p>	<p>58.5 TPY PM emissions limitation for the operation of this emissions unit (F004) and emissions unit F005 (Solidification of non-hazardous liquid wastes into solid wastes.)</p> <p>Operate this emissions unit in such a manner as to minimize or eliminate visible particulate emissions of fugitive dust, including the use of reasonably available control measures, as defined in additional terms and conditions B.1.2.b, 2.c, 2.d and 2.e to minimize or eliminate the emissions of fugitive dust.</p> <p>VE Limitations: See Additional Term and Condition B.1.2.a.</p>

2. Additional Terms and Conditions

- 2.a** There shall be no visible emissions except for a period of time not to exceed one minute during any sixty-minute operating period, except during periods of handling of the materials in the storage piles. During periods of handling of the materials in the storage piles, there shall be no visible particulate emissions which exceed 20% opacity as a three-minute average.
- 2.b** The permittee shall employ reasonably available control measures on all storage pile operations associated with the operation of this emissions unit for the purpose of ensuring compliance with the above-mentioned applicable emissions limitations and control measures. In accordance with the permittee's permit application, the permittee has committed to minimizing drop heights during the unloading of trucks and during the load in and load out of the storage piles, maintaining and operating a watering system consisting of a permanent water storage tank, hose, nozzles, and other necessary equipment to spray water, watering of dusty materials, either prior to dumping or during dumping, and good operating practices to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** No dusty material shall be dumped during periods when wind speeds exceed 20 mph unless the material has been watered prior to the dumping and will be watered during the dumping operation. The permittee shall utilize the wind speed indicator required for the operation of emissions unit F002, Landfill Operations, to obtain wind speed readings.

The permittee shall employ reasonably available control measures for wind erosion from the surface of the storage piles 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 watering, as necessary, to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2. Additional Terms and Conditions (continued)

- 2.d** When a storage pile of sawdust is in existence and whenever this emissions unit is not in operation, in addition to any necessary watering as described in these additional terms and conditions, the storage pile shall be covered with a tarp.
- 2.e** Emissions unit F004 shall be operated such that the handling of the sawdust is minimized in accordance with good engineering judgment.
- 2.f** The above-mentioned control measures shall be employed for each storage pile if the permittee determines, as a result of the inspections conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable emission limitations and control measures. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.

II. Operational Restrictions

- 1.** The permittee shall not handle any material associated with emissions unit F004 more than ten hours per day and 312 days per calendar year.
- 2.** The permittee shall not unload more than 7500 cubic yards of sawdust in any one day and shall not store more than 7500 cubic yards of sawdust at any one time. The permittee shall not unload more than 281,000 cubic yards of sawdust in any one calendar year.

III. Monitoring and/or Record Keeping Requirements

1. Monitoring/Inspection Requirements

- 1.a** Except as otherwise provided in this section, the permittee shall perform inspections of the storage piles in accordance with the following frequencies:

storage piles	minimum inspection frequency
all storage piles	daily

- 1.b** The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for fugitive dust emissions. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a storage pile 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 emissions limitations and control measures. 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.
- 1.c** The control measures shall be implemented at frequencies that will minimize or eliminate visible emissions of fugitive dust generated by the storage piles and ensure compliance with the above-mentioned emissions limitations and control measures, and the needed frequencies of implementation shall be determined by the permittee's inspections. It is further understood that on any specific day, implementation of the control measures shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust for all fugitive dust associated with the storage piles and to ensure compliance with the above-mentioned visible emission limitations.
- 1.d** 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 emissions limitations and control measures. 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.

2. Record Keeping Requirements

The permittee shall maintain records of the following information:

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

- 2.a** A record of water applications required by this permit shall be maintained by the permittee. The records of water applications shall be maintained in a bound logbook at the facility site for a period of not less than three years and shall be made available to the Canton local air agency for review during normal business hours. The record of each water application shall include which storage pile was watered, which operation was watered and whether watering was performed for wind erosion, the type of material(s) being watered, and the date of the water application.
- 2.b** The permittee shall maintain daily records of the number of hours that this emissions unit was operated and the volume of sawdust unloaded. These records shall be maintained in a bound logbook at the facility site for a period of not less than five years and shall be made available to the Director or the Canton local air agency for review during normal business hours.
- 2.c** The permittee shall maintain records of the following information:
- i. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - ii. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - iii. the dates the control measures were implemented; and
 - iv. 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.

The information required in B.III.2.c. shall be kept separately for the load-in operations, load-out operations, and the pile surface (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

- 1.** The permittee shall submit the following annual reports by January 31 of each year covering the previous calendar year:
 - 1.a** a days-of-operation report containing the number of days that this emissions unit was operated in the past calendar year;
 - 1.b** a volume-of-sawdust report which contains the volume of sawdust unloaded in cubic yards per calendar year; and
 - 1.c** a water application report containing the records of each water application required in special term and condition B.III.2.a, including which storage pile was watered, which operation(s) was (were) watered and whether watering was performed for wind erosion, the type(s) of materials being watered, and the date of the water application.
- 2.** Deviation reports

IV. Reporting Requirements (continued)

- 2.a** The deviation reports shall be submitted in accordance with the reporting requirements of the general terms and conditions of this permit. The permittee shall submit deviation reports that identify any of the following:
- i. any daily records in which this emissions unit was operated more than 10 hours per day;
 - ii. any daily records in which more than 7500 cubic yards of sawdust were unloaded in this emissions unit per day;
 - iii. 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
 - iv. each instance when a control measure that was to be implemented as a result of an inspection was not implemented.
- 2.b** If there are no deviations during a calendar year quarter that must be submitted pursuant to term and condition B.IV.2.a. and general term and condition B.2.b., the permittee shall submit a quarterly report which states that no deviations occurred during that quarter in accordance with general term and condition B.2.b.

V. Testing Requirements

- 1.** Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a** Emissions Limitation:
58.5 TPY PM

Applicable Compliance Method:

Utilize the PM emission factor of 1.0 lb PM emitted per ton of sawdust handled. This emission factor is for the loading and unloading of sawdust into an open bed truck. The emission factor is from the USEPA document "AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants", EPA 450/4-90-003, SCC 3-07-008-03, "Sawdust Pile Handling, General" for Sawmill Operations. The emission factor for sawdust handling was used because sawdust represents the lightest, worst-case, solidifying material. Based on engineering judgement, for lack of a better emission factor and because of the use of the sawdust emission factor, the use of this emission factor represents the fugitive PM emissions from both emissions units P004 and P005.

Per PTI 15-1282, the maximum unloading rate of materials is 37.5 tons per hour and emissions units P004 and P005 are each limited to operating less than or equal to 10 hours per day and 312 days per year.

The maximum annual emissions in tons of PM emitted from emissions units P004 and P005 = (37.5 tons sawdust/hr) (1.0 lb PM emitted/ton sawdust handled) (actual hours of operation during the year) (ton/2000 lbs).

- 1.b** Emissions Limitation:
For the storage piles, except during periods when associated material is being handled, no visible emissions except for a period of time not to exceed one minute during any sixty-minute period.

Applicable Compliance Method:

Method 22 in accordance with OAC 3745-17-03 (B)(4)

- 1.c** Emissions Limitation:
For the following operations associated with emissions unit F004: truck unloading, load in and load out of materials to the piles, and the operation of the front end loader during these operations, 20% opacity limit as a three-minute average.

Applicable Compliance Method:

Method 9 in accordance with OAC 3745-17-03 (B)(3)

Facility Name: **Countywide Recycling and Disposal Facility**
Facility ID: **15-76-00-1579**
Emissions Unit: **Solid Waste Storage Piles (F004)**

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Liquid Waste Solidification (F005)

Activity Description: Mixing of non-hazardous liquid wastes with absorbant solid wastes in the mixing tank to produce solid wastes

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
This emissions unit consists of the placement of the mixing agent or select solid waste into an in-ground, open topped, mixing tank and the mixing of the select solid wastes or mixing agents with liquid wastes in the tank to produce solid waste.	None	See section A.I.2.a.

2. Additional Terms and Conditions

- 2.a There are no applicable emissions limitations/control measures from OAC rule 3745-17-08 because the facility is not located in an Appendix A area as defined in this rule.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>This emissions unit consists of the placement of the mixing agent or select solid waste into an in-ground, open topped, mixing tank and the mixing of the select solid wastes or mixing agents with liquid wastes in the tank to produce solid waste.</p>	<p>OAC rule 3745-31-05 PTI #15-1282 issued 03/26/97</p>	<p>58.5 TPY PM emissions limitation for the operation of this emissions unit (F005) and F004 (Sawdust or other suitable mixing agent and select solid waste storage piles)</p> <p>Operate this emissions unit in such a manner as to minimize or eliminate visible particulate emissions of fugitive dust including the use of reasonably available control measures, as defined in additional terms and conditions B.1.2.b, 2.c, 2.d and 2.e to minimize or eliminate the emissions of fugitive dust.</p> <p>VE Limitations: See additional term and condition B.1.2.a.</p>

2. Additional Terms and Conditions

- 2.a** During the placement of the mixing agent or select solid waste into the mixing tank and during the mixing of the select solid wastes or mixing agents with liquid wastes, there shall be no visible particulate emissions which exceed 20% opacity as a three-minute average.
- 2.b** The permittee shall employ reasonably available control measures on all operations associated with the operation of this emissions unit for the purpose of ensuring compliance with the above-mentioned applicable emissions limitations and control measures. In accordance with the permittee's permit application, the permittee has committed to minimizing drop heights during the loading of the in-ground tank, maintaining and operating a watering system consisting of a permanent water storage tank, hose, nozzles, and other necessary equipment to spray water, watering of dusty materials, either prior to or during loading of the in-ground tank, and good operating practices to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** No dusty materials shall be dumped during periods when wind speeds exceed 20 MPH unless the material has been watered prior to the dumping and will be watered during the dumping operation. The permittee shall utilize the wind speed indicator required for the operation of emissions unit F002, Landfill Operations, to obtain wind speed readings.
- 2.d** In order to minimize or eliminate visible particulate emissions of fugitive dust, the mixing of the liquid wastes and select solid wastes or mixing agent shall take place only in the in-ground tank.
- 2.e** This emissions unit, F005, shall be operated such that the handling of the sawdust is minimized in accordance with good engineering judgment.

2. Additional Terms and Conditions (continued)

- 2.f The above-mentioned control measures shall be employed if the permittee determines, as a result of the inspections conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable emission limitations and control measures. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.

II. Operational Restrictions

1. The total amount of mixing agents mixed in the in-ground tank shall not exceed 1050 cubic yards per day.
2. The permittee shall not operate this emissions unit more than ten hours per day and 312 days per calendar year.

III. Monitoring and/or Record Keeping Requirements

1. Monitoring/Inspection Requirements

- 1.a Except as otherwise provided in this section, the permittee shall perform inspections of this emissions unit in accordance with the following frequencies:

Emissions Unit:

during the placement of the mixing agent or select solid waste into an in-ground, open-topped, mixing tank and the mixing of the select solid wastes or mixing agents with liquid wastes in the tank to produce solid waste

Minimum Inspection Frequency:

daily, on days the emissions unit is operated

- 1.b The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for fugitive dust emissions. The inspections shall be performed during representative, normal operating conditions.
 - 1.c The control measures shall be implemented at frequencies that will minimize or eliminate visible emissions of fugitive dust generated by the operation of this emissions unit and ensure compliance with the above-mentioned emissions limitations and control measures, and the needed frequencies of implementation shall be determined by the permittee's inspections.
 - 1.d The permittee may, upon receipt of written approval from the Canton 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 emissions limitations and control measures. 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.
- ### 2. Record Keeping Requirements
- 2.a A record of water applications required by this permit shall be maintained by the permittee. The records of water applications shall be maintained in a bound logbook at the facility site for a period of not less than five years and shall be made available to the Director or the Canton local air agency for review during normal business hours. The record of each water application shall include which operation was watered, the type of material being watered, and the date of the water application.
 - 2.b The permittee shall maintain daily records of the number of hours that this emissions unit was operated and the volume of mixing agents mixed in the in-ground tank. These records shall be maintained in a bound logbook at the facility site for a period of not less than five years and shall be made available to the Canton local air agency for review during normal business hours.

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

- 2.c** The permittee shall maintain records of the following information:
- i. the date and reason any required inspection was not performed;
 - ii. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - iii. the dates the control measures were implemented; and
 - iv. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days that the emissions unit was operated.
- The information required in B.III.2.c. shall be kept separately for the load-in operations, load-out operations, and the mixing operations and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- v. The permittee shall comply with the "Waste Management, Inc. Directive Number ED-111" record keeping conditions, as described in Miscellaneous Requirement Section B.VI.1.

IV. Reporting Requirements

1. The permittee shall submit the following annual reports by January 31 of each year covering the previous calendar year:
 - 1.a a water application report containing the records of each water application required in special term and condition B.III.2.a., including which operations were watered, the types of materials being watered, and the date of the water application; and
 - 1.b an operation report containing the number of days that this emissions unit was operated in the past calendar year, the number of hours that this emissions unit was operated for each day that it was operated, and the total amount of mixing agents mixed in the inground tank for each day that it was operated.
2. Deviation reports
 - 2.a The deviation reports shall be submitted in accordance with the reporting requirements of the general terms and conditions of this permit. The permittee shall submit deviation reports that include any of the following records required to be recorded in term and condition B.III.2.c and that identify any of the following occurrences:
 - i. any daily records in which this emissions unit was operated more than 10 hours per day;
 - ii. any daily records in which more than 1050 cubic yards of mixing agents were mixed in the inground tank in this emissions unit per day;
 - iii each day during which an inspection was not performed by the required frequency; and
 - iv each instance when a control measure that was to be implemented as a result of an inspection, was not implemented.
 - 2.b If there are no deviations during a calendar year quarter that must be submitted pursuant to term and condition B.IV.2.a. and general term and condition B.2.b., the permittee shall submit a quarterly report which states that no deviations occurred during that quarter in accordance with general term and condition B.2.b.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Utilize the PM emission factor of 1.0 lb PM emitted per ton of sawdust handled. This emission factor is for the loading and unloading of sawdust into an open bed truck. The emission factor is from the USEPA document "AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants", EPA 450/4-90-003, SCC 3-07-008-03, "Sawdust Pile Handling, General" for Sawmill Operations. The emission factor for sawdust handling was used because sawdust represents the lightest, worst-case, solidifying material. Based on engineering judgement, for lack of a better emission factor and because of the use of the sawdust emission factor, the use of this emission factor represents the fugitive PM emissions from both emissions units P005 and P004.

Per PTI 15-1282, the maximum unloading rate of materials is 37.5 tons per hour and emissions units P005 and P004 are each limited to operating less than or equal to 10 hours per day and 312 days per year.

The maximum annual emissions in tons of PM emitted from emissions units P005 and P004 = (37.5 tons sawdust/hr) (1.0 lb PM emitted/ton sawdust handled) (actual hours of operation during the year) (ton/2000 lbs).

- 1.b** Emissions Limitation:
For the following operations associated with emissions unit F005: the placement of the mixing agent or select solid wastes or mixing agents with liquid wastes, 20% opacity limit as a three-minute average.

Applicable Compliance Method:
Method 9 in accordance with OAC rule 3745-17-03(B)(3)

VI. Miscellaneous Requirements

1. The permittee shall not process liquid wastes that are hazardous wastes, radioactive wastes, regulated polychlorinated biphenyl (PCB) wastes, or asbestos-containing wastes. In order to comply with this requirement, the permittee shall comply with the "Waste Management, Inc. Directive Number ED-111", with issue date March 2, 1992, and revision date September 27, 1996, which was submitted as part of the PTI #15-1282 application.
2. The permittee shall not utilize any combination of select solid wastes or mixing agents and liquid wastes in this emissions unit which will result in the emission of any air contaminant, except particulate matter, in excess of the de minimis amounts in accordance with the de minimis rule, OAC rule 3745-15-05, unless a Permit to Install (PTI) or PTI modification is obtained from the Ohio EPA prior to beginning such utilization. In addition, the permittee shall not utilize the solid waste from an aluminum foundry known as hot cake as a select solid waste to mix with non-hazardous liquid waste unless a Permit to Install (PTI) or PTI modification is obtained from the Ohio EPA prior to beginning such utilization. The permittee may utilize the solid waste from an aluminum foundry which has been previously weathered as a select solid waste to mix with non-hazardous liquid waste.

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