

Statement of Basis For Title V Permit

Company Name	Rumpke Sanitary Landfill - Brown County	
Premise Number	07-08-00-0033	
Number of Non-insignificant Emissions Units	2	
What makes this facility a Title V facility?	MSW landfill with design capacity greater than 2.5 million megagrams and 2.5 million cubic meters	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2	19		The permittee shall not cause or allow any open burning at this location.

C Instructions for Part II:

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

C If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EUs	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
F002	no visible particulate emissions except for one minute during any 60-minute observation period for paved roadways and parking areas and three minutes during any 60-minute observation period for unpaved roadways and parking areas	3745-31-05(A)(3)	N	N	Y	Y	Y	N	N	<p>M - Compliance shall be determined by daily inspections of the roadways and parking areas to determine the need for implementation of the control measures in Section A.I.2.c and A.I.2.d.</p> <p>R - Compliance shall be determined by maintaining records of date and reason any required inspections were not performed, dates where it was necessary to implement the control measures and the dates the control measures were implemented.</p> <p>Rp - Compliance shall be determined by deviation reporting of each day during which an inspection was not performed by the required frequency and each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.</p> <p>ET - If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR part 60, Appendix A, Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.</p>
		3745-17-08(B) and 3745-17-07(B)	N	N	N	N	N	N	N	This facility is located in Brown County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.
P901	No visible particulate emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours and the flare shall be operated with a flame present at all times	40 CFR Part 60, Subpart WWW	Y	Y	Y	Y	Y	Y	N	<p>OR - When the calculated NMOC emission rate is greater than 50 megagrams per year (55.1 tpy), a pilot flame shall be maintained at all times in the flare's pilot light burner.</p> <p>M - Compliance shall be determined by a continuous monitoring device installed, operated and maintained to monitor the flare pilot flame.</p> <p>R - Compliance shall be determined by review of records of all periods during which there was no pilot flame and the downtime for the flare and monitoring equipment when the collection and control system is in operation.</p> <p>Rp - Compliance shall be determined by quarterly deviation reporting of all periods during which the flare pilot flame was not functioning properly.</p> <p>ET - If required, compliance shall be demonstrated based upon the visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in 40 CFR Part 60.18.</p>

Visible particulate fugitive emissions shall not exceed 20% opacity as a 3-minute average for cell load-in and wind erosion	3745-31-05(B)(3)	N	Y	N	N	N	N	N	N	<p>M - Compliance shall be determined by daily inspections of the landfill operation areas to determine need for implementing the control measures in Section A.I.2.h and A.I.2.j.</p> <p>R - Compliance shall be determined by review of records of date and reason any required inspection is not performed and when it was necessary to implement the control measures.</p> <p>Rp - Compliance shall be determined by review of deviation reports of each day during which an inspection of the fugitive dust sources was not performed by the required frequency and each instance when a control measure that was to be implemented, as a result of an inspection of the fugitive dust sources, was not implemented.</p> <p>ET - Compliance shall be demonstrated based upon the visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.</p>
0.16 lb/hr of NMOC from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	ET - Compliance shall be determined by emission estimates calculated using USEPA's Landfill Air Emission Estimate Model version 1.0 and AP-42 emission factors and equations from section 2.4.
0.71 tpy of NMOC from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	ET - Compliance with the tpy emission limitation shall be assumed provided compliance with the NMOC emission limitation, in lb/hr, is maintained.
129.53 tpy of methane from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	ET - Emissions estimates were calculated using USEPA's Landfill Air Emission Estimate Model, version 1.0.
24.75 lbs/hr of CO from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	ET - Compliance shall be determined based upon a flare AP-42 emission factor of 750 lbs of CO/mm dscfm of methane and a maximum flow rate of 1000 dscfm of methane.
108.41 tpy of CO from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	ET - Compliance with the tpy emission limitation shall be assumed provided compliance with the CO emission limitation, in lbs/hr, is maintained.
1.32 lbs/hr Nox from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	ET - Compliance shall be determined based on a flare AP-42 emission factor of 40 lbs of Nox/mm dscfm of methane and a maximum flow rate of 1000 dscfm of methane.
5.78 tpy of Nox from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	ET - Compliance with the tpy emission limitation shall be assumed provided compliance with the NOx emission limitation, in lbs/hr, is maintained.
0.01 lb/hr of SO2 from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	ET - Compliance shall be determined based upon a value of 46.9 ppmv for reduced sulfur and equations from AP-42..

	0.04 tpy of SO2 from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	ET - Compliance with the tpy emission limitation shall be assumed provided compliance with the SO2 emission limitation, in lbs/hr, is maintained.
	0.56 lb/hr of particulate emissions from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	ET - Compliance shall be determined based on a flare AP-42 emission factor of 17 lbs of Nox/mm dscfm of methane and a maximum flow rate of 1000 dscfm of methane.
	2.46 tpy of particulate emissions from the open flare	3745-31-05(A)(3)	N	N	N	N	N	N	N	ET - Compliance with the tpy emission limitation shall be assumed provided compliance with the particulate emission limitation, in lbs/hr, is maintained.
	0.14 tpy of particulate emissions which are fugitive landfill emissions	3745-31-05(A)(3)	N	N	N	N	N	N	N	ET - Compliance shall be determined based on emission factors from AP-42.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

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

Misc = miscellaneous requirements

C Instructions for Part III:

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

C If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For each column where “N” is specified, there should be a brief explanation in the “Comments” section. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.

3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.