

Facility ID: 1677010976 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emission units are located at this facility:
G001 - Diesel Dispensing Unit
Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.
2. The permittee shall not cause or allow any open burning at this location.
3. The permittee shall not initiate or allow any salvage operation to be conducted at this location without prior approval of the Ohio EPA. This excludes recycling or energy recovery, unless Ohio EPA approval is needed.
4. The permittee shall operate this facility in such a manner that it does not become offensive or objectionable to the public in violation of OAC rule 3745-15-07. If an odor resulting from construction activities is detected at the property line, the permittee shall institute all available mitigation measures. Odor mitigation measures deemed appropriate by the Director to protect the comfort, repose, health or safety of the public shall be implemented upon request.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010976 Emissions Unit ID: F001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Existing MSW landfill, gas collection and control system	OAC rule 3745-17-07	See A.I.2.a below.
	OAC rule 3745-18-06	13.6 lbs/hr of SO2
	OAC rule 3745-21-08	See A.I.2.b below.
Load-in of landfill cell (see Section A.I.2.h. for identification of landfill cell)	40 CFR 60 Subpart WWW	no visible emissions from the flare
	OAC rule 3745-17-07(B)	20 percent opacity, as a 3-minute average
Operation of vehicles on top of landfill cell, excluding emissions from the combustion of fuels in such vehicles (i.e., surface working)	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.e, A.I.2.f and A.I.2.j)
	OAC rule 3745-17-07(B)	20 percent opacity, as a 3-minute average
Wind erosion from landfill cell	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.g, A.I.2.i and A.I.2.j)
	OAC rule 3745-17-07(B)	20 percent opacity, as a 3-minute average

2. Additional Terms and Conditions

- a. The emission limit based on this applicable rule is less stringent than the limit established pursuant to 40 CFR 60, Subpart WWW.
- b. The permittee shall minimize the carbon monoxide emissions from this emissions unit by the use of the best available control techniques and operating practices in accordance with best current technology.
- c. All landfill gas shall be collected and routed to a flare control system designed and operated to reduce NMOCs by 98 weight-percent, at maximum inlet concentration. The NMOC concentrations shall be determined by Method 25C.
- d. The landfill cell that is covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 is listed below:

Hardy Road Cell
- e. The permittee shall employ reasonably available control measures on all cell load-in operations associated with the landfill cell for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the cell load-in operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- f. The above-mentioned control measures shall be employed for each cell load-in operation of the 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 ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.
- g. The permittee shall employ reasonably available control measures on all surface working operations associated with the landfill cell for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the surface working operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- h. The permittee shall employ reasonably available control measures for wind erosion from surfaces associated with the landfill cell for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the landfill surface with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- i. The above-mentioned control measures shall be employed for surface operations and wind erosion from the 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 ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures 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 ensure compliance with the above-mentioned applicable requirements.
- j. 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 OAC rule 3745-17-08.

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II. Operational Restrictions

- 1. Whenever the flare is in operation, a temperature of at least 1400 degrees F (or higher temperature if needed to ensure 98 weight-percent destruction of the NMOCs) must be maintained.
- 2. The total quantity of landfill gas burned in the flare system shall not exceed 950,400 cubic feet per day.
- 3. If the heat sensing device detects a no flame condition which cannot be immediately restarted, the system shall automatically shut down the flow of landfill gas.
- 4. All recording devices shall be synchronized based on the time of day.
- 5. The flare and landfill gas collection system shall be operated and maintained by personnel properly trained in its operation.
- 6. The gas collection system shall be operated at negative pressure to ensure that all landfill gas is directed to the flare station as required by A.1.2.c above.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall install a sampling port at each well and measure and record the gauge pressure in the gas collection header on a monthly basis.
- 2. The permittee shall operate and maintain a heat sensing device, such as an ultraviolet beam sensor or thermocouple at the pilot light to indicate the continuous presence of a flame. The heat sensing device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record all periods of time during which a flame is not present.
- 3. The permittee shall operate and maintain a continuous gas flow monitor and recorder which measures and records the gas flow to the control device at least every 15 minutes. The gas flow monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record, on a daily basis, the total volume of landfill gas burned in the flare system.
- 4. The permittee shall, on a daily basis, visually inspect the flare during operation and record whether or not any visible emissions are present.
- 5. Except as otherwise provided in this section, the permittee shall perform inspections of each cell load-in operation at the landfill cell in accordance with the following frequencies:

landfill cell identification minimum cell load-in inspection frequency

Hardy Road Cell daily

6. Except as otherwise provided in this section, the permittee shall perform inspections of the surface working operation associated with the landfill cell in accordance with the following frequencies:

landfill cell identification minimum surface working inspection frequency

Hardy Road Cell daily

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

landfill cell identification minimum wind erosion inspection frequency

Hardy Road Cell daily

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

9. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for cell load-in of the landfill cell, surface working operations, and wind erosion from the surface of the landfill cell. The inspections shall be performed during representative, normal landfill cell operating conditions.

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

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

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

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

c. the dates the control measures were implemented; and

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

12. The information required in 11.d. shall be kept separately for (i) the cell 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.

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

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

a. all 3-hour blocks of time during which the average flame temperature, when the emissions unit was in operation, was less than 1400 degrees F; and

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

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IV. Reporting Requirements

- Any breakdown or malfunction of the landfill gas flare resulting in the emission of raw landfill gas shall be reported to the Ohio EPA within one hour after the occurrence, or as soon as reasonably possible, in accordance with the requirements specified in Part I - General Term and Condition A.2, and immediate remedial measures shall be undertaken to correct the problem and prevent further emission to the atmosphere.
- In the event of a potential emergency, such as a fire within the landfill, wells affected may be temporarily shut off, which could result in a positive gauge pressure. The Ohio EPA field office shall be notified within one working day of any shut downs of any wells.
- The permittee shall submit semi-annual reports which include an identification of any daily record showing that

visible emissions from the flare were present. The reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6 calendar months.

4. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each month during which the gauge pressure in the gas collection header gave a positive pressure reading and the actual gauge pressure reading for each such month;
 - b. an identification of each period during which the flame sensor indicated that a flame was not present; and
 - c. an identification of each day during which the total volume of landfill gas burned by the flare exceeded 950,400 cubic feet, and the actual total volume of landfill gas burned for each such day.
5. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
6. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average flame temperature did not comply with the temperature limitation specified above.
7. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
8. Drawings of the landfill gas collection system, as built, shall be submitted to the Ohio EPA Northeast District Office within 90 days after the issuance of this permit and shall be maintained on site. The drawings shall include locations of wells and trenches, well depths, pipe lengths, diameters, condensate traps, layout of the system and other relevant information.
9. The permittee shall submit an initial design capacity report in accordance with 60.757(a).

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NMOC.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for NMOC, Method 25C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - 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 appropriate Ohio EPA District Office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

13.6 lbs/hr of SO₂

Applicable Compliance Method:

Compliance shall be determined using USEPA's Landfill Air Emissions Estimations Model Program, version 1.1. The pounds per hour limitation was established pursuant to OAC rule 3745-18-06 as the maximum allowable emission rate for this emissions unit, and as such, represents a value that exceeds the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and

reporting requirements to insure compliance with this limit.

b. Emission Limitation:

no visible emissions

Applicable Compliance Method:

OAC rule 3745-17-03(B)(4)

c. Emission Limitation:

98 weight-percent destruction of NMOC

Applicable Compliance Method:

Compliance with the allowable destruction of NMOC shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 25C.

d. Emission Limitation:

20 percent opacity for cell load-in and wind erosion, as a 3-minute average

Applicable Compliance Method:

Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03*

e. Emission Limitation:

20 percent opacity for surface working operations on top of landfill cells, as a 3-minute average

Applicable Compliance Method:

Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a), (B)(3)(b) and (B)(3)(e) of OAC rule 3745-17-03*

- f. *The procedures related to Test Method 9 reflects the settlement agreement reached between Ohio EPA and the Ohio Electric Utilities concerning the Utilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing these procedures was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the Ohio Electric Utilities have agreed to consider the procedures as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the procedures as a revision to the Ohio SIP for particulate matter.

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VI. **Miscellaneous Requirements**

1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Existing MSW landfill, gas collection and control system	OAC rule 3745-31-05 (PTI 16-1480)	1.32 lbs \hr of SO2 1.31 lbs \hr of NMOC 0.81 lb \hr of NO2 4.40 lbs \hr of CO 1.0 TPY of HAPs * 0.01 TPY of HCl 0.01 TPY of benzene 0.01 TPY of vinyl chloride
load-in of landfill cell (see Section A.I.2.h. for identification of landfill cell)	none	none
operation of vehicles on top of landfill cell, excluding emissions from the combustion of fuels in such vehicles (i.e., surface working)	none	none

2. **Additional Terms and Conditions**

- a. * Vinyl chloride, benzene, and HCl are also taken into account in the allowable emissions for the HAPs.

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. If there are no deviations during a calendar quarter that must be reported pursuant to the reporting requirements of this permit, the permittee shall submit a quarterly report, in accordance with paragraph B.8 of the General Terms and Conditions of this permit, which states that no deviations occurred during that quarter.

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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 methods:
 - a. Emission Limitation:
 - 1.32 lbs/hr of SO2
 Applicable Compliance Method:

Compliance shall be determined using USEPA's Landfill Air Emissions Estimations Model Program, version 1.1. The pounds per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and reporting requirements to insure compliance with this limit.
 - b. Emission Limitation:
 - 1.31 lbs/hr of NMOC
 Applicable Compliance Method:

Compliance with the allowable destruction of NMOC shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 25C. It is assumed that the destruction of NMOC will be accomplished by the flare and the presence of a flame is monitored continuously.
 - c. Emission Limitation:
 - 0.81 lb/hr of NO2
 Applicable Compliance Method:

Compliance shall be determined using USEPA's Landfill Air Emissions Estimations Model Program, version 1.1. The pounds per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and reporting requirements to insure compliance with this limit.

d. Emission Limitation:

4.40 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be determined using USEPA's Landfill Air Emissions Estimations Model Program, version 1.1. It is assumed that the destruction of CO will be accomplished by the flare and the presence of a flame is monitored continuously.

e. Emission Limitation:

1.0 TPY of HAPs

Applicable Compliance Method:

Compliance shall be determined using USEPA's Landfill Air Emissions Estimations Model Program, version 1.1. It is assumed that the destruction of HAPs will be accomplished by the flare and the presence of a flame is monitored continuously.

f. Emission Limitation:

0.01 TPY of HCl

Applicable Compliance Method:

Compliance shall be determined using USEPA's Landfill Air Emissions Estimations Model Program, version 1.1. The ton per year limitation was established for PTI purposes to reflect the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and reporting requirements to insure compliance with this limit.

g. Emission Limitation:

0.01 TPY of benzene

Applicable Compliance Method:

Compliance shall be determined using USEPA's Landfill Air Emissions Estimations Model Program, version 1.1. It is assumed that the destruction of benzene will be accomplished by the flare and the presence of a flame is monitored continuously.

h. Emission Limitation:

0.01 TPY of vinyl chloride

Applicable Compliance Method:

Compliance shall be determined using USEPA's Landfill Air Emissions Estimations Model Program, version 1.1. It is assumed that the destruction of vinyl chloride will be accomplished by the flare and the presence of a flame is monitored continuously.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677010976 Emissions Unit ID: F002 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 roadways and parking areas (see Section A.I.2.a)	OAC rule 3745-17-07(B)(4)	no visible particulate emissions except for 6 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.a, A.I.2.c, A.I.2.d, A.I.2.e, A.I.2.h and A.I.2.i)
Unpaved roadways and parking areas (see Section A.I.2.b)	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.e through A.I.2.i)

2. Additional Terms and Conditions

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

(a)

Paved roadways:

entrance road

Paved parking areas:

entrance parking

- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Unpaved roadways:

unpaved road - D
unpaved road - G

Unpaved parking areas:

none

- c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. 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.
- e. The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- g. The needed frequencies of implementation of the control measures shall be determined by the

permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures 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 ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- h. 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 controlled with the control measure specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- i. pen-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- j. 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 OAC rule 3745-17-08.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:
 - Paved roadways and parking areas Minimum inspection frequency
 - paved road daily
 - parking area daily
 - Unpaved roadways and parking areas Minimum inspection frequency
 - unpaved road - D daily
 - unpaved road - G daily
- 2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. 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 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.
- 3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.
- 4. 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 4.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.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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V. Testing Requirements

1. Compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.*

* The procedures relating to Test Method 22 reflect the settlement agreement reached between Ohio EPA and the Ohio Electric Utilities concerning the Utilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing the procedures was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the Ohio Electric Utilities have agreed to consider the procedures as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the procedures as a revision to the Ohio SIP for particulate matter.

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VI. Miscellaneous Requirements

1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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 roadways and parking areas (see Section A.I.2.a.)	none	none
Unpaved roadways and parking areas (see Section A.I.2.b.)	none	none

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. If there are no deviations during a calendar quarter that must be reported pursuant to the reporting requirements of this permit, the permittee shall submit a quarterly report, in accordance with paragraph B.8 of the General Terms and Conditions of this permit, which states that no deviations occurred during that quarter.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None