



10/31/2024

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Ross Incineration Services, Inc.
Facility ID: 0247050278
Permit Type: Renewal
Permit Number: P0134712

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Ohio EPA document search website here: <https://epa.ohio.gov/help-center/edocument-search/edocument-search>. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3611 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: Ohio EPA DAPC, Northeast District Office



PROPOSED

Division of Air Pollution Control Title V Permit for Ross Incineration Services, Inc.

Facility ID:	0247050278
Permit Number:	P0134712
Permit Type:	Renewal
Issued:	10/31/2024
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Ross Incineration Services, Inc.

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Proposed Title V Permit
Ross Incineration Services, Inc.
Permit Number: P0134712
Facility ID: 0247050278
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0247050278
Facility Description: Treatment, Storage, Disposal Facility for Hazardous Waste
Application Number(s): A0074328, A0075464
Permit Number: P0134712
Permit Description: Title V renewal for a commercial hazardous waste incinerator.
Permit Type: Renewal
Issue Date: 10/31/2024
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0108010

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Ross Incineration Services, Inc.
36790 Giles Road
Grafton, OH 44044-9752

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Rd.
Twinsburg, OH 44087
(330)963-1200

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Anne M. Vogel
Director

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:
- (1) Standard Term and Condition A. 21., Air Pollution Nuisance
 - (2) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (4) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting for State-Only Requirements
 - (5) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (6) Standard Term and Condition A. 30., Submitting Documents Required by this Permit

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-

chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the

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emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.20, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting

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requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

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

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(v))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedance of a Federally Enforceable Emission Limitation or Control Requirement Resulting from Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be

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accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) 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 except as provided pursuant to A. 16 below.

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- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01, OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77-07(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. 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.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the state, and citizens

under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under state law only.

(Authority for term: OAC rule 3745-77-07(B))

13. 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:
 - (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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 Ohio EPA DAPC, Northeast District Office 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) 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.

- (2) Compliance certifications shall include the following:
- a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d)(2)a. above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A. 13.d)(2)a. above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. 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 [defined as "Title I modification" in OAC rule 3745-77-01], 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 Ohio EPA DAPC, Northeast District Office 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 Ohio EPA DAPC, Northeast District Office as soon as possible

after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as “insignificant activities and emissions levels” as defined in OAC rule 3745-77-01. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. 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 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit-to-Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit-to-install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

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

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for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. 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.

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

27. Scheduled Maintenance/Malfunction Reporting for State-Only Requirements

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 Ohio EPA DAPC, Northeast District Office 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).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

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- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. 40 CFR Part 61, Subpart FF - National Emission Standards for Benzene Waste Operations

40 CFR 61.342	Standards: General
40 CFR 61.343	Standards: Tanks
40 CFR 61.345	Standards: Containers
40 CFR 61.346	Standards: Individual Drain Systems
40 CFR 61.348	Standards: Treatment Processes
40 CFR 61.349	Standards: Closed-Vent Systems and Control Devices
40 CFR 61.354	Monitoring of Operations
40 CFR 61.355	Test Methods, Procedures, and Compliance Provisions
40 CFR 61.356	Recordkeeping Requirements
40 CFR 61.357	Reporting Requirements

3. The following insignificant EUs are located at this facility:

- T020 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 25 (PTI 19-088)
- T021 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 26 (PTI 19-088)
- T022 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 27 (PTI 19-088)
- T023 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 28 (PTI 19-088)
- T024 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 29 (PTI 19-088)
- T025 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 30 (PTI 19-088)
- T026 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 31 (PTI 19-088)
- T027 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 32 (PTI 19-088)
- T028 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 33 (PTI 19-088)
- T029 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 34 (PTI 19-088)
- T030 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 35 (PTI 19-088)
- T031 – 9,920 gallon storage tank located in Tank Farm I, Storage Tank 36 (PTI 19-088)
- T035 – 10,000 gallon storage tank, Storage Tank 70 (PTI 02-3263)
- T036 – 7,500 gallon storage tank, Storage Tank 73 (PTI 02-3263)
- T037 – 7,500 gallon storage tank, Storage Tank 74 (PTI 02-3263)
- T039 – 12 storage tanks (each 9,920 gallons), Storage Tanks 39 through 50 (PTI 02-9920)
- T040 – 5 storage tanks (each 9,920 gallons), Storage Tanks 53 through 57 (PTI 02-2237)
- T043 – 9,920 gallon storage tank for liquid wastes located in Tank Farm I, Storage Tank 123 (P0130430)

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T044 – 9,920 gallon storage tank for liquid wastes located in Tank Farm I, Storage Tank 124 (P0130430)
T045 – 9,920 gallon storage tank for liquid wastes located in Tank Farm II, Storage Tank 237 (P0130481)
T046 – 9,920 gallon storage tank for liquid wastes located in Tank Farm II, Storage Tank 238 (P0130481)
T047 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 351 (P0130482)
T048 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 352 (P0130482)
T049 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 358 (P0133795)
T050 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 359 (P0133795)
T051 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 360 (P0133795)
T052 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 361 (P0133795)
T053 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 362 (P0133795)
T054 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 363 (P0133795)
T055 – 9,920 gallon storage tank for liquid wastes located in Tank Farm III, Storage Tank 364 (P0133795)

Each insignificant EU at this facility must comply with all State and Federal regulations, as well as any emission limitations and/or control requirements contained with the identified PTI for the EU. Insignificant EUs listed above that are not subject to specific PTI requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

4. The permittee's PTE HAPs is less than 10 and 25 TPY for single and combined HAPs, respectively.

C. Emissions Unit Terms and Conditions

1. N001, Thermal Oxidizer

Operations, Property and/or Equipment Description:

Rotary kiln for hazardous waste incineration. Air contaminant emissions are controlled by quench chamber, cyclone separator, radial flow scrubber, gas-liquid contactor, and two wet electrostatic precipitators.

a) 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) b)(1)j, d)(20) through d)(23) and e)(7)g.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) P0136093	NO _x emissions shall not exceed 18.21 tons per month averaged over a rolling, 12-month period.
b.	OAC rule 3745-31-05(A)(3) P0136093	PE from the stack shall not exceed 50.37 TPY. SO ₂ emissions shall not exceed 15.1 lbs/hr and 66.14 TPY. CO emissions shall not exceed 179.6 TPY. Hydrocarbon emissions shall not exceed 22.56 TPY. Lead emissions shall not exceed 3.0 TPY. Mercury emissions shall not exceed 1.13 TPY. Beryllium emissions shall not exceed 0.004 TPY.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Dioxin and furan emissions shall not exceed 2.3×10^{-6} TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). See b)(2)e.
c.	OAC rule 3745-31-05(D)	NO _x emissions shall not exceed 218.5 tons per rolling, 365-day period. See b)(2)d.
d.	OAC rule 3745-31-05(F)	Hydrochloric acid and chlorine gas emissions, expressed as hydrochloric acid equivalents, shall not exceed 10 TPY. See b)(2)j.
e.	OAC rule 3745-17-07(A)	Visible PE from any stack serving this EU shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-17-09	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-18-06	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-17-07(B)	This EU is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
i.	OAC rule 3745-17-08(B)	The permittee is not located within an Appendix A area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this EU is exempt from the requirements of OAC rule 3745-17-08(B).
j.	OAC rule 3745-114-01	See d)(20) through d)(23) and e)(7)g.
k.	OAC rule 3745-110-03(T)	NO _x emissions from this EU, with a rated maximum capacity of 26,057 lbs/hr of waste materials, shall not exceed 158.1 lbs/hr, based on a rolling 24 hour average.
k.	40 CFR Part 63, Subpart EEE (Final MACT standards for hazardous waste combustors)	Dioxins and furans emissions shall not exceed 0.40 ng TEQ/dscm, corrected to 7% oxygen.

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Mercury emissions shall not exceed 130 ug/dscm corrected to 7% oxygen.</p> <p>Lead and cadmium emissions, combined, shall not exceed 230 ug/dscm corrected to 7% oxygen.</p> <p>Arsenic, beryllium and chromium emissions, combined, shall not exceed 92 ug/dscm corrected to 7% oxygen.</p> <p>CO emissions shall not exceed 100 ppm by volume, over an hourly rolling average, on a dry basis, corrected to 7% oxygen or hydrocarbon emissions shall not exceed 10 ppm by volume during the DRE test run or equivalent, over an hourly rolling average, on a dry basis, corrected to 7% oxygen, reported as propane.</p> <p>Hydrochloric acid and chlorine gas emissions, combined, expressed as a chloride equivalent, shall not exceed 32 ppm by volume, on a dry basis, corrected to 7% oxygen.</p> <p>PE from the stack shall not exceed 0.013 grain/dscf, corrected to 7% oxygen.</p> <p>See b)(2)b and b)(2)c.</p>
I.	40 CFR Part 61, Subpart C (NESHAP for Beryllium)	Beryllium emissions shall not exceed 10 grams per 24 hour period.
m.	40 CFR Part 61, Subpart FF (NESHAP for Benzene Waste Operations)	See b)(2)f, d)(17) and e)(11).

(2) Additional Terms and Conditions

- a. Total maximum waste feed rate to the kiln and to the main combustion chamber is 26,057 pounds per hour, including the weight of containers, and 105,120 TPY.
- b. This EU is a hazardous waste combustor and shall comply with all applicable requirements of 40 CFR Part 63 MACT and Subpart EEE National Emission Standards for Hazardous Waste Combustors.

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- c. This EU is not permitted to burn and shall not burn dioxin-listed hazardous wastes, including waste codes of F020, F021, F022, F023, F026 or F027.
- d. The emissions of NO_x from this EU shall not exceed 218.5 tons, based upon a cumulative, rolling 365-day summation of the nitrogen oxides emissions.
- e. The incinerator system shall achieve a destruction and removal efficiency (DRE) of 99.99% for each selected principal organic hazardous constituent (POHC).
- f. The permittee shall monitor and maintain the total annual benzene quantity from facility waste to less than 10 megagrams per year. The total annual benzene quantity is determined based upon the quantity of benzene in the waste before entering the incinerator. If it is determined that the benzene quantity has exceeded or will exceed 10 megagrams per year, the permittee shall demonstrate compliance with 61.342(b) and 61.342(c) of the NESHAP.
- g. The permittee shall maintain a written quality assurance/quality control plan for the continuous CO, O₂, and NO_x monitoring systems, designed to ensure continuous valid and representative readings of CO, O₂, and NO_x emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO, O₂, and NO_x monitoring systems must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60 and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

- h. The CO, O₂, and NO_x continuous emission monitoring systems consist of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers and data recording/processing hardware and software.
- i. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart EEE, including the following sections:

40 CFR 63.1206(b)(4)	Extension of Compliance with Emission Standards
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- j. Potential HCl emissions are related to the total chlorine and chloride feed rate to the incinerator. The permittee has opted to limit incineration of wastes containing chlorine and chloride and use the voluntary restriction under OAC rule 3745-31-05(F) to ensure HCl emissions do not exceed 10 TPY.

c) Operational Restrictions

- (1) The incinerator, including all associated equipment and grounds, shall be designed, operated, and maintained to prevent the emissions of objectionable odors.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0136093]

- (2) The permittee shall operate and maintain a slag and bottom ash collection system that will eliminate fugitive dust emissions. Trucks hauling slag and bottom ash shall be covered prior to leaving the plant property.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0136093]

- (3) Start-up of the incinerator shall begin with the heating of the cold combustion zone with:

- a. NG;
- b. propane;
- c. distillate fuel oil;
- d. used oil meeting the specifications set forth in OAC rule 3745-279-11; or
- e. any purchased material that meets the used oil specifications.

For this permit condition "start-up" includes all time during start-up, shutdown, and upset conditions in which the incinerator temperature is less than the minimum temperature.

Alternate fuels may not be used unless approved by OEPA NEDO.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0136093]

- (4) All used oil burned in EU N001 during startup shall meet the following specifications, in accordance with OAC rule 3745-279-11:

Contaminant/Property	Allowable Specifications
Arsenic	5 ppm, maximum
Cadmium	2 ppm, maximum
Chromium	10 ppm, maximum
Lead	100 ppm, maximum
PCB's	2 ppm, maximum
Total Halogens	4000 ppm, maximum*
Mercury	1 ppm, maximum
Flash Point	100 degrees Fahrenheit, minimum

* Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR 279.10(b)(1)(ii) and OAC rule 3745-279-10(B)(1)(b). Therefore, during startup, the permittee may burn used oil

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exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the permittee can demonstrate the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-63.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0136093]

- (5) The permittee shall comply with all State and Federal laws and regulations including, but not limited to, the Toxic Substances Control Act of 1979. No polychlorinated biphenyls (PCBs) in excess of 50 ppm shall be incinerated.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0136093]

- (6) The permittee shall maintain the control equipment, associated with this EU, in accordance with the manufacturers' operating manuals, with any adjustments or modifications deemed necessary by the permittee, and as required by the standards promulgated in 40 CFR Part 63, Subpart EEE.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart EEE and P0136093]

- (7) The permittee shall minimize or eliminate visible fugitive PE from the kiln and main combustion chamber by maintaining the maximum combustion zone pressure lower than ambient pressure, by means of an induced draft fan.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0136093]

- (8) The permittee shall establish and document the hourly rolling average of each of these parameters including, but not limited to (as per the final rule), the following parameters:

Operating Parameter	Limit	Averaging Time	Pollutant	Citation
Maximum Total System Feed Rate	26,057 lbs/hr	hourly rolling		Director of OEPA Moratorium
Maximum Kiln Pumpable Waste Feed Rate	5,685 lbs/hr	hourly rolling	DRE D/F Particulate SVM/LVM HCl/Cl ₂	63.1209(j) 63.1209(k) 63.1209(m) 63.1209(n) 63.1209(o)
Maximum Kiln Total Waste Feed Rate	19,848 lbs/hr	hourly rolling	DRE D/F Particulate SVM/LVM HCl/Cl ₂	63.1209(j) 63.1209(k) 63.1209(m) 63.1209(n) 63.1209(o)
Minimum Kiln Temperature	1650 °F	hourly rolling	DRE D/F	63.1209(j) 63.1209(k)
Maximum Kiln Operating Pressure	- 0.05 in. w.c.	instantaneous	System leaks	63.1209(p)

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Maximum Main Chamber Pumpable Waste Feed Rate	12,852 lbs/hr	hourly rolling	DRE D/F Particulate SVM/LVM HCl/Cl ₂	63.1209(j) 63.1209(k) 63.1209(m) 63.1209(n) 63.1209(o)
Maximum Main Chamber Total Waste Feed Rate	18,515 lbs/hr	hourly rolling	DRE D/F Particulate SVM/LVM HCl/Cl ₂	63.1209(j) 63.1209(k) 63.1209(m) 63.1209(n) 63.1209(o)
Minimum Main Chamber Temperature	1867 °F	hourly rolling	DRE D/F	63.1209(j) 63.1209(k)
Maximum Main Chamber Operating Pressure	- 0.05 in. w.c.	instantaneous	System leaks	63.1209(p)
Maximum Total Chlorine/Chloride Feed Rate	958 lbs/hr	12-hour rolling	SVM/LVM HCl/Cl ₂	63.1209(n) 63.1209(o)
Maximum Total Ash Feed Rate	16,499 lbs/hr	12-hour rolling	Particulate	63.1209(m)
Maximum Total Mercury Emission Concentration (MTEC)	130 ug/dscm @7% oxygen	12-hour rolling	mercury	63.1209(l)
Maximum Total SVM Feed Rate	46.4 lbs/hr	12-hour rolling	SVM	63.1209(n)
Maximum Pumpable SVM Feed Rate	15.5 lbs/hr	12-hour rolling	SVM	63.1209(n)
Maximum Total LVM Feed Rate	63.1 lbs/hr	12-hour rolling	LVM	63.1209(n)
Maximum Pumpable LVM Feed Rate	63.1 lbs/hr	12-hour rolling	LVM	63.1209(n)
Minimum Quench Inlet Header Flow Rate	572 gpm	hourly rolling	D/F	63.1209(k)
Maximum Quench Outlet Gas Temperature	194 °F	instantaneous	D/F	63.1209(k)
Minimum Radial Flow Scrubber Differential Pressure	17.0 in. w. c.	hourly rolling	Mercury HCl/Cl ₂	63.1209(l) 63.1209(o)
Minimum Radial Flow Scrubber Liquid to Gas Ratio	16.6 gal/kacf	hourly rolling	Mercury HCl/Cl ₂	63.1209(l) 63.1209(o)
Minimum Contactor Outlet pH	5.28	hourly rolling	Mercury HCl/Cl ₂	63.1209(l) 63.1209(o)
Minimum Contactor Liquid to Gas Ratio	48.7 gal/kacf	hourly rolling	Mercury HCl/Cl ₂	63.1209(l) 63.1209(o)
Minimum Contactor Differential Pressure	0.75 in. w. c.	hourly rolling	Mercury HCl/Cl ₂	63.1209(l) 63.1209(o)

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Minimum Contactor Nozzle Pressure	13.15 in. w.c.	hourly rolling	Particulate SVM/LVM HCl/Cl ₂	63.1209(m) 63.1209(n) 63.1209(o)
Number of WESPs Operating	2		Particulate SVM/LVM	63.1209(m) 63.1209(n)
Minimum WESP 1 Power	0.5 kVA	hourly rolling	Particulate SVM/LVM	63.1209(m) 63.1209(n)
Minimum WESP 2 Power	12 kVA	hourly rolling	Particulate SVM/LVM	63.1209(m) 63.1209(n)
Maximum Closed Loop Specific Gravity	1.120 g/cc	12-hour rolling	Particulate SVM/LVM	63.1209(m) 63.1209(n)
Maximum Stack Gas Flow Rate	52,300 acfm	hourly rolling	DRE D/F Particulate SVM/LVM HCl/Cl ₂	63.1209(j) 63.1209(k) 63.1209(m) 63.1209(n) 63.1209(o)
Minimum Kiln Burner Air Atomization Pressure	90 psig	instantaneous	DRE	63.1209(j)
Minimum Kiln Burner Waste Feed Pressure	80 psig	instantaneous	DRE	63.1209(j)
Minimum Kiln Lance Atomization Air Pressure	30 in. w.c.	instantaneous	DRE	63.1209(j)
Minimum Main Chamber Burner Air Pressure	28 in. w.c.	instantaneous	DRE	63.1209(j)

These parameters shall also be established as required by 40 CFR 63.1209, during the most recent compliance demonstration, and reported in the Notification of Compliance (NOC).

The OPLs in the above table were established in the NOC Operating Parameter Limits (OPLs) in the October 10, 2022, CPT Report. These OPLs are subject to change and these changes may not be immediately reflected in this permit document. If OPLs change because of a compliance demonstration that occurs after the date identified above and are reported in a future NOC, the permittee shall comply with the OPLs in the most recent NOC, which is incorporated into the Title V permit by reference until such time that a permit modification is completed. The limits identified in the previous NOC are no longer applicable.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart EEE and P0136093]

- (9) The permittee shall operate the wet electrostatic precipitator (WESP) controller in a manner that maximizes the particulate removal performance of the unit. This shall include but not be limited to setting the controller to automatically maximize effective secondary voltage, while considering the manufacturer's recommended maximum spark rate. The

permittee shall not arbitrarily or artificially lower the WESP controller set points, except for the purposes of particulate removal performance testing or to optimize particulate removal performance by minimizing sparking.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0136093]

- (10) The emission standards and operating requirements do not apply during the following times:
- a. Startup, shutdown, and malfunctions; and
 - b. When hazardous waste is not in the combustion chamber.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart EEE]

- (11) Compliance with the DRE standard:
- a. Except as provided in c. below, the permittee must document compliance with the DRE only once provided no modifications (that could affect the ability of the incinerator to achieve the DRE standard) were made to the incinerator after the DRE test.
 - b. The permittee may use any DRE test data that documents the incinerator achieved the required DRE level provided:
 - i. The incinerator has not been modified in a manner that would affect the ability of the incinerator to achieve the DRE standard since the DRE test was performed; and
 - ii. The DRE test data meet the quality assurance objectives determined on a site-specific basis.
 - c. If the permittee feeds hazardous waste at a location in the combustion system other than the normal flame zone, then the permittee shall demonstrate compliance with the DRE standard during each comprehensive performance test.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart EEE]

- (12) Startup, Shutdown, and Malfunction (SSM) Plan
- a. 40 CFR 63.6(e)(3) applies;
 - b. If the permittee elects to comply with 40 CFR 270.235 to address RCRA concerns to minimize emissions of toxic compounds from SSM events (including releases from emergency safety vents (ESV)):
 - i. The SSM Plan must include a description of potential causes of malfunctions, including releases from ESVs that may result in significant releases of HAPs, and actions taken to minimize the frequency and severity of those malfunctions.

- ii. The SSM Plan shall be submit for review and approval.
 - (a) The permittee shall be notified of approval or intent to deny approval of the SSM Plan within 90 calendar days after receipt of the original request and within 60 calendar days after receipt of any supplemental information that is submitted. Before disapproving the plan, the permittee shall be notified of an intent to disapprove the plan with:
 - (i) Notice of the information and findings on which intended disapproval is based, and
 - (ii) Notice of opportunity for the permittee to present additional information before final action on disapproval of the plan. At the time the permittee is notified of intention to disapprove the plan, it will be specified how much time the permittee will have to submit additional information.
 - (b) The permittee is responsible for ensuring that any supplemental and additional information supporting the plan is submitted in a timely manner. Neither the submittal of the plan, nor failure to approve or disapprove the plan, relieves the permittee of the responsibility to comply.
- iii. Changes to the Plan that may significantly increase emissions.
 - (a) The permittee shall request approval, in writing, within 5 days after making a change to the SSM Plan that may significantly increase emissions of HAPs.
 - (b) To request approval of any changes to the SSM Plan, the procedures for initial SSM Plan approval shall be followed.
- c. The permittee must identify in the SSM Plan a projected oxygen correction factor based on normal operations to use during periods of startup and shutdown.
- d. The SSM Plan shall be recorded in the operating record.
- e. Operating under the SSM Plan
 - i. Compliance with Automatic Waste Feed Cut-Off (AWFCO) requirements during malfunctions.
 - (a) AWFCO requirements apply.
 - (b) If the malfunction itself prevents immediate and automatic cutoff of the hazardous waste feed, the permittee shall cease feeding hazardous waste as quickly as possible.

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- (c) Although the AWFCO requirements are still applicable during a malfunction, an exceedance of an emission standard monitored by a CEMS or COMS or operating limit, is not a violation provided the permittee operated in accordance with 40 CFR 63.6(e)(1).
- (d) For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber, during any 60-day block period, the permittee must:
 - (i) Within 45 days of the 10th exceedance, complete an investigation of the cause of each exceedance and evaluation of approaches to minimize the frequency, duration, and severity of each exceedance, and revise the SSM Plan as warranted by the evaluation to minimize the frequency, duration, and severity of each exceedance.
 - (ii) Record the results of the investigation and evaluation in the operating record, and include a summary of the investigation and evaluation, and any changes to the SSM Plan, in the excess emissions report required under 40 CFR 63.10(e)(3).
- ii. Compliance with AWFCO requirements when burning hazardous waste during startup and shutdown.
 - (a) If the permittee feeds hazardous waste during startup or shutdown, the permittee shall include waste feed restrictions (e.g., type and quantity), and other appropriate operating conditions and limits in the SSM Plan and they must be interlocked with the requirements of the AWFCO system.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart EEE]

(13) Automatic Waste Feed Cutoff (AWFCO)

- a. Upon the compliance date, the permittee shall operate the incinerator with a functioning system that immediately and automatically cuts off the hazardous waste feed when:
 - i. Any OPL is exceeded, an emission standard monitored by a CEMS is exceeded, and the allowable combustion chamber pressure is exceeded;
 - ii. The span value of any CMS detector is met or exceeded, except a CEMS;
 - iii. A malfunction of a CMS monitoring an OPL; or
 - iv. Any component of the AWFCO system fails.

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- b. The permittee shall continue to duct combustion gasses, during an AWFCO, to the air pollution control system while hazardous waste remains in the combustion chamber.
- c. The permittee shall continue to monitor during the AWFCO the operating parameters for which limits have been established and the emissions required to be monitored by a CEMS. Hazardous waste feed shall not commence until the operating parameters and emission levels are within specified limits.
- d. If the AWFCO system fails to automatically and immediately cutoff the flow of hazardous waste upon the exceedance of a parameter required to be interlocked with the AWFCO system, the permittee would have failed compliance with the AWFCO requirements. If equipment or other failure prevents immediate and automatic cutoff of the hazardous waste feed, the permittee shall cease feeding hazardous waste as quickly as possible.
- e. If, after any AWFCO, there is an exceedance of an emission standard or operating requirement, irrespective of whether the exceedance occurred while hazardous waste remained in the incinerator, the permittee shall investigate the cause of the AWFCO, take appropriate corrective measures to minimize future AWFCOs, and record the findings and corrective measures in the operating record.
- f. Excessive Exceedance Reporting
 - i. For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the incinerator during a 60-day block period, the permittee shall submit a written report within 5 calendar days of the 10th exceedance documenting the exceedances and results of the investigation and corrective measures taken.
 - ii. On a case-by-case basis, OEPA NEDO may require excessive exceedance reporting when fewer than 10 exceedances occur during a 60-day block period.
- g. The AWFCO system and associated alarms must be tested at least weekly to verify operability, unless it is documented in the operating record that weekly inspections will unduly restrict or upset operations and that less frequent inspections will be adequate. At a minimum, testing must be conducted monthly. The results of all AWFCO testing shall be recorded in the operating record.
- h. Ramping Down Waste Feed.
 - i. The permittee may ramp down the waste feed rate of pumpable hazardous waste over a period not to exceed one minute. The ramp down procedures must be documented in the operating and maintenance plan. The procedures shall specify that ramp down begins immediately upon initiation of AWFCO and the procedures must prescribe a bona fide ramping down. If an emission standard or operating limit is exceeded during the ramp down, the permittee has failed to comply with these standards.

- ii. If the AWFCO is triggered by an exceedance of any of the operating limits, the permittee shall not ramp down the waste feed cutoff: minimum combustion chamber temperature, maximum hazardous waste feed rate, or any hazardous waste firing system operating limits that may be established for the incinerator.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart EEE]

(14) Combustion System Leaks

- a. Combustion system leaks of HAPs shall be controlled by:
 - i. Keeping the combustion zone sealed to prevent combustion system leaks;
 - ii. Maintaining the maximum combustion zone pressure lower than ambient pressure using an instantaneous monitor;
 - iii. Upon written approval, an alternative means of control to provide control of combustion system leaks equivalent to maintenance of combustion zone pressure lower than ambient pressure; or
 - iv. Upon written approval, other technique(s) which can be demonstrated to prevent fugitive emissions without use of instantaneous pressure limits.
- b. The permittee shall specify in the performance test work plan and the NOC the method that will be used to control combustion system leaks. If combustion system leaks are controlled by maintaining the combustion zone pressure lower than ambient pressure using an instantaneous monitor, the monitoring and recording frequency of the pressure monitoring must be specified in the performance test work plan and the NOC. Additionally, the permittee shall specify how the monitoring approach will be integrated into the AWFCO system.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart EEE]

(15) Operator Training and Certification

- a. The permittee shall establish training programs for all categories of personnel whose activities may reasonably be expected to directly affect emissions of HAPs from the incineration system. Such persons include, but are not limited to, chief facility operators, control room operators, continuous monitoring system operators, persons that sample and analyze feedstreams, persons that manage and change feedstreams to the combustor, persons that operate emission control devices, and ash and waste handlers. Each training program shall be of a technical level commensurate with the person's job duties specified in the training manual. Each commensurate training program shall require an examination to be administered by the instructor at the end of the training course. Passing of this test shall be deemed the "certification" for personnel, except that, for control room operators, the training and certification program shall be as specified in c. through f. below.

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- b. The permittee shall ensure that the incinerator is operated and maintained at all times by persons who are trained and certified to perform these and any other duties that may affect emissions of hazardous air pollutants. A certified control room operator shall be on duty at the site at all times the incinerator is in operation.
- c. Hazardous waste incinerator control room operators shall:
 - i. Be trained and certified under a site-specific, source-developed and implemented program that meets the requirements in f. below;
 - ii. Be trained under the requirements of, and certified under, one of the following American Society of Mechanical Engineers (ASME) standards: QHO-1-1994, QHO-1a-1996, or QHO-1-2004 (Standard for the Qualification and Certification of Hazardous Waste Incinerator Operators). If the permittee elects to use the ASME program:
 - (a) Control room operators shall, prior to the compliance date, achieve provisional certification, and shall submit an application to ASME and be scheduled for the full certification exam. Within one year of the compliance date, control room operators must achieve full certification,
 - (b) New operators and operators of new sources shall, before assuming their duties, achieve provisional certification, and shall submit an application to ASME, and be scheduled for the full certification exam. Within one year of assuming their duties, these operators shall achieve full certification or
 - iii. Be trained and certified under a State program.
- d. Site-specific, source developed and implemented training programs for control room operators shall include the following elements:
 - i. Training on the following subjects:
 - (a) Environmental concerns, including types of emissions;
 - (b) Basic combustion principles, including products of combustion;
 - (c) Operation of the specific type of combustor used by the operator, including proper startup, waste firing, and shutdown procedures;
 - (d) Combustion controls and continuous monitoring systems;
 - (e) Operation of air pollution control equipment and factors affecting performance;
 - (f) Inspection and maintenance of the combustor, continuous monitoring systems, and air pollution control devices;

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- (g) Actions to correct malfunctions or conditions that may lead to malfunction;
 - (h) Residue characteristic and handling procedures; and
 - (i) Applicable Federal, state, and local regulations, including Occupational Safety and Health Administration workplace standards.
 - ii. An examination designed and administered by the instructor; and
 - iii. Written material covering the training course topics that may serve as reference material following completion of the course.
- e. To maintain control room operator qualification under a site-specific, source developed and implemented training program, control room operators shall complete an annual review or refresher course covering, at a minimum, the following topics:
 - i. Update of regulations;
 - ii. Combustor operation, including startup and shutdown procedures, waste firing, and residue handling;
 - iii. Inspection and maintenance;
 - iv. Responses to malfunctions or conditions that may lead to malfunction; and
 - v. Operating problems encountered by the operator.
- f. The permittee shall record the operator training and certification program in the operating record.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart EEE]

(16) Operation and Maintenance Plan

- a. The permittee shall prepare and at all times operate according to an operation and maintenance plan that describes in detail procedures for operation, inspection, maintenance, and corrective measures for all components of the combustor, including associated pollution control equipment, that could affect emissions of regulated HAPs.
- b. The plan shall prescribe how to operate and maintain the combustor in a manner consistent with good air pollution practices for minimizing emissions at least to the levels achieved during the comprehensive performance test (CPT).
- c. The plan ensures compliance with the operation and maintenance requirements of 40 CFR 63.6(e) and minimizes emissions of pollutants, AWFCOs, and malfunction.

d. The plan shall be recorded in the operating record.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart EEE]

(17) Failure to submit a timely Notification of Compliance (NOC)

a. If the permittee fails to postmark a NOC by the specified date, the permittee shall cease hazardous waste burning immediately.

b. Prior to submitting a revised NOC, the permittee may burn hazardous waste only for the purpose of pretesting or comprehensive performance testing and only for a maximum of 720 hours (renewable at the discretion of the OEPA).

c. The permittee shall submit a NOC subsequent to a new CPT before resuming hazardous waste burning.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart EEE]

(18) For the provisions of 40 CFR Part 61, Subpart E (NESHAP for Mercury) not to be applicable, the permittee shall not accept wastewater treatment plant sludge, as defined in 40 CFR Part 61, Subpart E.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0136093]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain on-site, the document(s) of certification received from USEPA or OEPA's CO documenting that the continuous CO, O₂, NO_x monitoring systems have been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6 (for NO_x), Performance Specification 4 or 4a (for CO) and Performance Specification 3 (for O₂). The letter/document of certification shall be made available to the Director or OEPA NEDO upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

(2) The permittee shall operate and maintain equipment to continuously monitor and record CO and NO_x emissions from this EU in units of the applicable standard(s) and record O₂ emitted from this EU in percent O₂. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

(3) The permittee shall maintain records of data obtained by the continuous CO, O₂, and NO_x monitoring system including, but not limited to:

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- a. emissions of CO and NO_x in ppm on an instantaneous (one-minute) basis;
- b. percent O₂ on an instantaneous (one-minute) basis;
- c. emissions of CO and NO_x in pounds per hour and in all units of the applicable standard(s) in the appropriate averaging period;
- d. results of quarterly cylinder gas audits;
- e. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- f. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- g. hours of operation of the EU, continuous CO, O₂ and NO_x monitoring system, and control equipment;
- h. the date, time, and hours of operation of the EU without the control equipment and/or the continuous CO, O₂ and NO_x monitoring system;
- i. the date, time, and hours of operation of the EU during any malfunction of the control equipment and/or the continuous CO, O₂ and NO_x monitoring system; and
- j. the reason (if known) and the corrective actions taken (if any) for each such event in (h) and (i).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (4) Following any compliance testing activities conducted to satisfy the requirements of the standard and upon postmark of the NOC for each such demonstration, the OPLs identified in the NOC shall replace those limits identified in the previous NOC. Record keeping demonstrating compliance with each of the hourly rolling average limits for each of these parameters shall be maintained using the appropriate continuous monitoring systems and associated recording equipment.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the water flow rate through the radial-flow scrubber and the gas-liquid contactor while the EU is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The permittee shall collect and record the scrubber water flow rate, in gallons per minute, on a continuous basis.

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The permittee may use the following alternative monitoring methodology in the event of an RFS or GLC flow meter instrumentation breakdown, thus avoiding an unnecessary AWFCO event, EPT and/or ESV opening.

The alternative monitoring methodology will utilize equations which have been developed by geometrically graphing scrubber water flow rates versus nozzle pressure based on known RFS and GLC operating data. In each case, the equations are based on curves representing greater than 98% of the operating data, with the resultant intercepts lowered to calculate more conservative flow rates than those based on the theoretical or actual flow curves. The calculated flow rates can then be used to determine the L/G ratio until the scrubber water flow meters can be repaired and brought back online, thus avoiding a needless AWFCO, EPT and/or ESV opening.

The permittee will not operate its RFS or GLC beyond their mechanical design limits without sufficient scrubber water flow. To that end, the permittee will only employ the alternative monitoring methodology in situations of an RFS or GLC flow meter breakdown whenever:

- the RFS or GLC temperatures are within their normal operating range,
- the scrubber water pump amps are within their normal operating range, and
- the nozzle pressures are within their normal operating range.

Temperature, pump amps, and nozzle pressure provide three separate reference points that can be monitored to ensure that there is adequate flow in the RFS and GLC in the event of flow meter instrumentation breakdowns. As a result, when these three key parameters (i.e. temperature, pump amps, and nozzle pressure) are within their normal operating ranges during such events, this will serve as verification that there are adequate RFS and GLC scrubber water flow rates. During normal operating conditions, the alternative flow measurement equations will be electronically programmed to run in the background, and only take over if the RFS or GLC flow meter fails and the above, bulleted conditions are being met.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (6) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pH of the scrubber liquor in the gas-liquid contactor while the EU is in operation. The pH monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (7) The permittee shall maintain the following records for the WESP(s) when the EU is in operation:
- a. The permittee shall monitor and record the following information on an hourly basis:

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- i. the average secondary voltage, in kilovolts, and the average secondary current in milliamperes, for each transformer rectifier (TR) set in the WESP(s);
 - ii. the average power input (in Volt-Amperes {VA}) of each TR set for each hour (calculated by multiplying the average secondary voltage {in kilovolts} by the average secondary current {in amperes} for each TR set); and
 - iii. the average total power input to the WESP(s) for each hour (add together the average power inputs for the TR sets operating during the hour).
- b. The permittee shall record the following information for each day of operation:
- i. the average power input to each WESP as 1-hour averages when the EU was in operation; and
 - ii. the duration of any downtime for the WESP(s) monitoring equipment for secondary voltage and current, not maintained as specified above; and each WESP section that is out of service, and the duration of the downtime for each section, when the associated EU was in operation.

The monitors and recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the parameters they were meant to record.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (8) The permittee shall develop a plan for the routine sampling and laboratory analysis of incoming wastes for the purpose of preventing polychlorinated biphenyls (PCBs), in excess of 50 ppm, from being incinerated in the kiln and the secondary combustion chamber. Such plan shall include as a minimum:
- a. a copy of the standard supplier contract which prohibits the delivery of PCBs in excess of 50 ppm to the facility; and
 - b. a copy of written provision for PCB analysis from an OEPA-approved laboratory.

All laboratory analyses shall be reported to the permittee directly from the laboratory and shall be retained on site and available for inspection by OEPA for a minimum of five (5) years.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (9) The permittee shall record the following information for each Emergency Safety Vent (ESV) opening that occurs while burning hazardous waste:
- a. the date;
 - b. the time the bypass vent was opened and closed;

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- c. the amount of waste in the kiln and the main combustion chamber at the time the vent opened;
- d. an estimate of air emissions, using the best available data, including emissions of PE, HCs, HCl, SO₂, NO_x, CO, beryllium, lead, mercury, arsenic, cadmium, and chromium; and
- e. the cause(s) of the ESV opening.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (10) The permittee shall maintain daily records of the following operating parameters, based on an hourly rolling average, unless otherwise specified:

- a. the maximum waste feed rate, not to exceed 26,057 pounds per hour, including the weight of containers, and 105,120 TPY.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (11) The permittee shall maintain daily records of the following information:

- a. the rolling hourly emissions rate of NO_x averaged over a 24-hour period (lbs);
- b. the hours of operation for each day; and
- c. total tons of waste fed to the incinerator.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (12) The permittee shall maintain monthly records of the following information:

- a. the rolling monthly emissions rate of NO_x averaged over a 12-month period (tons);
- b. the hours of operation for each month; and
- c. total tons of waste fed to the incinerator.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (13) The following information shall be recorded electronically and made accessible via modem:

- a. NO_x emissions (ppm and lbs/hr, as a one-minute block average); and
- b. CO emissions (raw ppm, ppm corrected to 7% oxygen on a dry basis, and pounds per hour, on a one-minute and 60-minute rolling average).

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (14) The permittee shall conduct Method 9 readings at least four days of each calendar week (Monday through Sunday) and for at least 30 minutes on each of the four days. The

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permittee may reduce the frequency of visual observations for this EU from four days each calendar week to weekly readings if the following conditions are met:

- a. for 1 full quarter, this EU's visual observations indicate the emissions are representative of normal operations; and
- b. the permittee continues to comply with all the record keeping and monitoring requirements specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)

The permittee shall revert to readings four days each calendar week for this EU if the emissions are not representative of normal operations. The permittee may again reduce the frequency of visual observations from four days each calendar week to weekly after obtaining 1 full quarter of observations with VEs that are representative of normal operations for this EU.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (15) The permittee shall record all times fuels not listed in c)(3) and not approved by OEPA are used during incinerator start-up. For each shipment of used oil received for burning in this EU during startup, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for the following:
 - a. the date(s) of shipment or delivery;
 - b. the quantity of oil received;
 - c. the heat content, in BTU/lb;
 - d. the flash point, in degrees Fahrenheit (required only for used oil);
 - e. the arsenic content, in ppm (required only for used oil);
 - f. the cadmium content, in ppm (required only for used oil);
 - g. the chromium content, in ppm (required only for used oil);
 - h. the lead content, in ppm (required only for used oil);
 - i. the PCB content, in ppm (required only for used oil);
 - j. the total halogen content, in ppm (required only for used oil);
 - k. the mercury content, in ppm (required only for used oil); and
 - l. the sulfur content, in percent (%) by weight.

A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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For this condition, start-up shall have the same definition as in c)(3).

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (16) The permittee shall maintain daily records of the amount of each fuel burned in this EU.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (17) The permittee shall maintain daily records of the materials received for burning at the facility. The records shall contain, as a minimum, the following information:

- a. name and address of the facility from which the material was received;
- b. name and address of the facility from which the material was generated or blended;
- c. date the material was received;
- d. amount of material and type of container; and
- e. description of the material including chemical composition.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (18) The permittee shall determine the total annual benzene quantity from facility waste as required in 40 CFR 61.355, from the National Emission Standard for Benzene Waste Operations. The total annual benzene quantity from facility waste shall be calculated by adding together the annual benzene quantity for each waste stream generated during the year. The facility shall maintain records of all measurements, calculations, and other documentation used to determine the benzene content of each waste stream fed to this EU.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (19) The permittee shall maintain daily records of the rolling, 365-day summation of NO_x emissions (tons).

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (20) The PTI for this EU (N001) was evaluated based on the actual materials and the design parameters of EU's exhaust system, as specified by the permittee in the PTI application. OEPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this EU using data from the PTI application and the TSCREEN model. The predicted 1-hour maximum ground level concentration from the use of the TSCREEN model was compared to the Maximum Acceptable Ground Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrogen Chloride

Ceiling Value (mg/m³): 7.46

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Maximum Hourly Emission Rate (lbs/hr): 33.0

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 13.7

MAGLC (ug/m3): 131

Pollutant: Mercury

TLV (mg/m3): 0.025

Maximum Hourly Emission Rate (lbs/hr): 1.85

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 0.594

MAGLC (ug/m3): 0.595

Pollutant: Lead

TLV (mg/m3): 0.05

Maximum Hourly Emission Rate (lbs/hr): 11.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.18

MAGLC (ug/m3): 1.19

[Authority for term: ORC 3704.03(F)(3)(c) and F(4) and OAC rule 3745-114-01]

- (21) Physical changes to or changes in the method of operation of the EU after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters; the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the EU or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[Authority for term: ORC 3704.03(F)(3)(c) and F(4) and OAC rule 3745-114-01]

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- (22) If the permittee determines that the “Air Toxic Policy” will be satisfied for the above changes, OEPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing PTI will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final PTI prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed EU will still satisfy the “Air Toxic Policy:”
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed EU still satisfies the “Air Toxic Policy”; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4) and OAC rule 3745-114-01]

- (23) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4) and OAC rule 3745-114-01]

- (24) Emergency Safety Vent (ESV) Openings

- a. If an ESV opens when hazardous waste remains in the incineration system during an event other than a malfunction as defined in the SSM Plan such that combustion gasses are not treated as during the most recent CPT, the permittee shall document in the operating record whether compliance with the emission standards was maintained.
- b. **ESV Operating Plan**
 - i. The permittee shall develop an ESV operating plan, comply with the plan and keep the plan in the operating record.
 - ii. The ESV plan shall contain detailed procedures for rapidly stopping the waste feed, shutting down the combustor, and maintaining temperature and negative pressure in the incineration system during hazardous waste residence time, if feasible. The plan shall include calculations and information and data documenting the effectiveness of the plan’s procedures for ensuring that incineration temperature and negative pressure are maintained as is reasonable feasible.

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- c. After any ESV opening that results in a failure to meet the emission standards, the permittee must investigate the cause of the ESV opening, take appropriate corrective measures to minimize such future ESV openings, and record the findings and corrective measures in the operating record.
- d. The permittee shall submit a written report within 5 days of an ESV opening that results in failure to meet the emission standards. The report shall document the result of the investigation and corrective measures taken.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(25) Hazardous Waste Residence Time

The permittee shall calculate the hazardous waste residence time and include the calculation in the performance test plan and the operating record. The permittee shall include the hazardous waste residence time in the NOC.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(26) Continuous Emissions Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS)

- a. The permittee shall use either a CO or THC CEMS to demonstrate and monitor compliance with the CO and THC standards. The permittee shall also use an oxygen CEMS to continuously correct the CO or THC level to 7 percent oxygen.
- b. The permittee shall install, calibrate, maintain, and operate a PM CEMS to demonstrate and monitor compliance with the PM standards. However, compliance with this requirement is not required until the effective dates of the applicable performance specification and operational requirements applicable to PM CEMS are promulgated by USEPA.
- c. The permittee shall install, calibrate, maintain, and continuously operate the CEMS and COMS in compliance with the quality assurance procedures: Performance Specification 1 (opacity), 4B (CO and oxygen), and 8A (THC).
- d. CO readings exceeding the span
 - i. If a CO CEMS detects a response that results in a one-minute average at or above the 3,000 ppmv span level required by Performance Specification 4B, the one-minute average must be recorded as 10,000 ppmv. The one-minute 10,000 ppmv value shall be used for calculating the hourly rolling average CO level.
 - ii. CO CEMS that use a span value of 10,000 ppmv when one-minute CO levels are equal to or exceed 3,000 ppmv are not subject to i. above. CO CEMS that use a span value of 10,000 are subject to the same CEMS performance and equipment specifications when operating in the range of 3,000 ppmv to 10,000 ppmv that are provided by Performance Specification 4B for other CO CEMS, except:

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- (a) Calibration drift must be less than 300 ppmv; and
 - (b) Calibration error must be less than 500 ppmv.
- e. Petitions to use CEMS for other standards
- i. The permittee may petition to use CEMS for compliance monitoring for PM, mercury, semivolatile metals (SVM), low volatile metals (LVM), and hydrogen chloride and chlorine gas.
- f. Calculation of Rolling Averages
- i. The CO or THC CEMS shall begin recording one-minute average values by 12:01 a.m. and hourly rolling average values by 1:01 a.m. when 60 one-minute values will be available for calculating the initial hourly rolling average for those sources that come into compliance on the regulatory compliance date. Sources that elect to come into compliance before the regulatory compliance dates shall begin recording one-minute and hourly rolling average values within 60 seconds and 60 minutes (when 60 one-minute values will be available for calculating the initial hourly rolling average), respectively, from the time at which compliance begins.
 - ii. The permittee shall ignore periods of time when one-minute values are not available for calculating the hourly average. When one-minute values become available again, the first one-minute value is added to the previous 59 values to calibrate the hourly rolling average.
 - iii. The permittee shall continue monitoring CO and THC when the hazardous waste feed is cutoff if the incinerator is operating. The permittee shall not resume feeding hazardous waste if the emission levels exceed the standard.
- g. OPLs for hydrocarbons (THC)
- i. If the permittee chooses to demonstrate compliance through only continuously monitoring CO, the permittee shall demonstrate that THC emissions are not exceeded during the CPT. Additionally, the DRE OPLs that are established shall be sufficient to maintain THC standards. If DRE and THC tests are not conducted concurrently, the permittee shall establish separate OPLs based on each test and the more restrictive of the OPLs shall apply.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(27) Other continuous monitoring systems (CMS)

- a. The permittee shall use CMS (e.g., thermocouples, pressure transducers, flow meters) to document compliance with the applicable OPLs.

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- b. The permittee shall install and operate CMS other than CEMS that requires, at a minimum, to comply with the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system, except:
 - i. Calibration of thermocouples and pyrometers.

The calibration of thermocouples shall be verified at a frequency and in a manner consistent with manufacturer specifications, but no less frequent than once per year. The permittee shall operate and maintain optical pyrometers in accordance with manufacturer specifications unless otherwise approved. The permittee shall calibrate optical pyrometers in accordance with the frequency and procedures recommended by the manufacturer, but no less frequent than once per year, unless otherwise approved by OEPA.
- c. CMS shall sample the regulated parameter without interruption, and evaluate the detector response at least once each 15 seconds, and compute and record the average values at least every 60 seconds.
- d. The span of the non-CEMS CMS detector shall not be exceeded. The span limits shall be interlocked with the AWFCO system.
- e. Calculation of rolling averages.
 - i. CMS shall begin recording one-minute average values by 12:01 a.m. hourly average values by 1:01 a.m. (e.g., when 60 one-minute values will be available for calculating the initial hourly rolling average), and twelve-hour rolling averages by 12:01 p.m. (e.g., when 720 one-minute averages are available to calculate a 12-hour rolling average), for those sources that come into compliance on the regulatory compliance date. Sources that elect to come into compliance before the regulatory compliance date shall begin recording one-minute, hourly rolling average, and 12-hour rolling average values within 60 seconds, 60 minutes (when one-minute values will be available for calculating the initial hourly rolling average), and 720 minutes (when 720 one-minute values will be available for calculating the initial 12-hour rolling average) respectively, from the time at which compliance begins.
 - ii. The permittee shall ignore periods of time when one-minute values are not available for calculating rolling averages. When one-minute values become available again, the first one-minute value is added to the previous one-minute values to calculate rolling averages.
 - iii. The permittee shall continue monitoring operating parameters limits with a CMS when the hazardous waste feed is cutoff if the source is operating. The permittee shall not resume feeding hazardous waste if an operating parameter exceeds its limits.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(28) Analysis of feedstreams

- a. Prior to feeding material, the permittee shall obtain an analysis of each feedstream that is sufficient to document compliance with the applicable feedrate limits. The permittee shall develop and implement a feedstream analysis plan and record it in the operating record. The plan at a minimum shall specify:
 - i. The parameters for which each feedstream will be analyzed to ensure compliance with the operating limits;
 - ii. How the analysis was obtained, whether sampling and analysis was performed in house or was obtained from others using published or documented data or information;
 - iii. How the analysis will be used to document compliance with the applicable feedrate limits (e.g., if the permittee blends hazardous wastes and obtains analysis of the wastes prior to blending but not of the blended, as fired, waste, the plan shall describe how the pertinent parameters of the blended wastes are determined);
 - iv. The test methods used to obtain the analysis;
 - v. The sampling method used to obtain a representative sample of each feedstream to be analyzed; and
 - vi. The frequency with which the feedstreams are reviewed, or the initial analysis, is repeated to ensure the analysis is accurate and up to date.
- b. If requested, the feedstream analysis plan shall be submitted for review and approval.
- c. To comply with the applicable feedstream limits, the permittee shall monitor and record feedrates as follows:
 - i. Determine and record the value of the parameter for each feedstream by sampling and analysis or other method;
 - ii. Determine and record the mass or volume flowrate of each feedstream by a CMS. If flowrate of a feedstream by volume is determined, the permittee shall also determine and record the density of the feedstream by sampling and analysis (unless the constituent concentration in units of weight per unit volume (e.g., mg/l) is reported); and
 - iii. Calculate and record the mass feedrate of the parameter per unit time.
- d. The permittee is not required to monitor levels of metals or chlorine in the following feedstreams to document compliance with the feedrate limits provided that the permittee documents in the CPT plan the expected levels of the constituent in the feedstream and account for those assumed feedrate levels in documenting

compliance with the feedrate limits: NG, process air, and feedstreams from vapor recovery systems.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(29) Purpose [40 CFR 63.1209(c)]

The Ross Incineration Services, Inc. ("RIS") Feedstream Analysis Plan ("FSA Plan" or "the Plan"), has been prepared to comply with the feedstream analysis requirements under 40 CFR §63.1209(c). This Plan specifies the parameters for analyzing each feedstream intended for incineration to ensure compliance with OPLs, including:

- a. the method of performing the analysis,
- b. the manner in which the data will be used to demonstrate compliance with applicable feed rate limits,
- c. test and sampling methods, and
- d. the frequency of analysis.

The Plan frequently refers to, and is intended to be consistent with RIS' Waste Analysis Plan ("WAP") which is located in Section C of its Ohio Hazardous Waste Facility RCRA Part B Permit Application. Therefore, information from RIS' WAP and other sources of waste characterization data has been incorporated by reference as part of this FSAP. Because the FSAP is meant to be continuously upgraded and improved, RIS considers it a "dynamic" Plan. Therefore, mechanisms for change and improvement are contained in d)(33), as well as the procedures for the proper review and documentation of all changes and updates.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(30) Regulatory Background

Since 1970, the Clean Air Act ("CAA") has provided the primary framework for protecting people and the environment from the harmful effects of air pollution. A key component of CAA is a requirement that the USEPA significantly reduce the emissions of the most dangerous air pollutants - those that are known or suspected to cause serious health problems, known as HAPs, but they are also commonly referred to as toxic air pollutants or air toxics. Prior to 1990, CAA required USEPA to set standards for each HAP on an individual basis according to its particular health risk. These standards were termed the NESHAPs. In the 1990 amendments to CAA, Congress directed USEPA to replace the original approach with one based on what technology could currently achieve. Congress further required that the technology-based approach be followed by a risk-based approach to address any remaining or residual risks. In response, USEPA revised its approach for setting NESHAPs from a chemical-by-chemical approach to one that is based on the MACT for each industry group or source category. Under this revised approach, the standards for each industry group are based on the emission levels that are already being achieved by the better-controlled and lower-emitting sources within the group.

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For the hazardous waste combustion (“HWC”) source category, US EPA is developing the HWC NESHAPs in two phases. The first phase addressed hazardous waste burning incinerators, cement kilns, and lightweight aggregate kilns. The second phase addressed hazardous waste burning industrial boilers, process heaters, and hydrochloric acid production furnaces.

On September 30, 1999, USEPA published the Phase 1 HWC NESHAPs (64 FR 52828). These rules were promulgated under the joint authority of CAA and RCRA. Although both statutes continue to give USEPA the authority to regulate emissions from these sources, the Agency has determined that it would be duplicative to have emission standards and permitting requirements in both RCRA and CAA regulations, with one exception. If a regulatory authority determines that more stringent conditions than the HWC NESHAP are necessary to protect human health and environment for a particular facility, then that regulatory authority may impose those conditions in the facility's RCRA permit.

Since 1999, USEPA has issued several technical corrections and amendments to the Phase 1 NESHAP to improve its implementation. Other specific sections have been revised in response to the July 2000 vacatur ordered by the Court of Appeals for the District of Columbia Circuit, and the promulgation of interim standards, due to a second Court order issued in July 2001. This MACT Compliance Plan has been prepared and implemented as required, in accordance with the applicable HWC NESHAP regulations discussed above. A table which breaks down the MACT regulations for a FSA Plan, and then cross-references which sections of this Plan are intended to meet each of these requirements, is included in Attachment I for reference.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(31) Scope [40 CFR 63.1209(c)(2)]

The scope of this Plan is limited to describing those parameters for analyzing each feedstream, the method of performing each analysis, the manner in which the data will be used to demonstrate compliance with applicable feed rate limits, test, and sampling methods, and the frequency of analysis. This Plan has been designed to have all changes documented, and to ensure the proper review and approval of all updates. Therefore, because the FSAP is intended to be continuously upgraded and improved, RIS considers it a “dynamic” Program.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(32) Roles and Responsibilities [40 CFR 63.1209(c)(2)]

It is the responsibility of the Corporate Environmental Health and Safety (“EHS”) Department to ensure that the FSAP is properly implemented at RIS. In addition, the Corporate EHS Department ensures RIS management and affected employees are informed of any regulatory required changes in the future. Finally, the Corporate EHS Department has the responsibility to perform any reporting or investigations as required under this Plan. Each affected department at RIS will use the management of change (“MOC”) process to update the required sections of this Plan.

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The following Table shows the waste management duties for RIS personnel as they relate to the MACT FSA Plan. It outlines what each Department or individual's responsibilities are for waste handling and process operations at the facility. Each of these Departments / individuals receives training on their respective operating procedures in order that they can effectively carry out their duties as they relate to the FSAP.

Table 4-1 MACT FSA Plan Responsibilities

Position	Responsibilities
RIS – Senior Technical Engineer	-Initial FSA Plan preparation and revision. -Initial FSA training of plant employees. -Consultant regarding FSAP modifications and updates.
RIS-VP Technology	-Initial FSAP preparation and revision. -Initial FSAP training of Plant employees. -Consultation regarding Plan modifications and updates.
RIS-Operations Manager	-Implementation of the FSAP onsite. -Insure that the incineration system is operated and maintained at all times by persons who are trained in the FSAP. -Review and approval of all proposed changes to the Plan, prior to implementation.
RIS-Corporate EHS Manager	-Maintenance of the FSAP on site. -Insure that the incineration system is operated and maintained at all times by persons who are trained in the FSAP. -Review and approval of all proposed changes to the Plan, prior to implementation. -Recurrent evaluation of the Plan and its implementation to assure continuing compliance with applicable regulatory requirements. -Ensure recurrent FSAP training of applicable Plant employees is completed, including applicable record keeping and reporting.
RIS Finger Print Lab	-Receive FSAP training. -Receive WAP training and implement WAP onsite. -In accordance with the FSAP, responsible for: (i) the parameters to be analyzed; (ii) how the analyses are obtained; (iii) test methods; and (iv) Frequency of analysis.
RIS-Plant personnel	-Receive FSAP training, where applicable. -Carry out assigned duties in accordance with the FSAP, as applicable.
RES-Government	-Assist in the preparation and revision of the FSAP.

Affairs	-Assist in the review and identification of all regulations which could impact feedstream analysis. -Assist in all changes and modifications to the FSAP which are required due to regulatory changes or operational improvements.
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[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(33) Management of Change Process

As indicated above, the Corporate EHS Department is responsible for the maintenance of this Plan, as well as informing RIS of any regulatory required changes in the future. Likewise, the Corporate EHS Department is responsible for insuring that applicable RIS personnel receive the appropriate MACT training, and for managing record keeping and reporting required by the FSAP. Any RIS Department, which proposes changes to this Plan, will utilize the existing MOC process to have all tentative changes, reviewed, approved, and implemented by the proper personnel.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(34) MACT Feedstream Analysis Procedures [40 CFR 63.1209(c)(1), (2), (4), & (5)]

a. Definitions

For purposes of reference and a better understanding of the terminology used in this Plan, applicable MACT regulatory definitions (per 40 CFR §63.2) are contained in Attachment II.

b. General Procedure

RIS tracks waste streams from the time they are first identified for consideration by a customer, through established RIS acceptance and approval procedures until such streams are incinerated. This is performed by utilizing RIS' main frame computer (IBM i5), its local area network (LAN) and related servers, and its incinerator's distributed control system (Rockwell Distributed Control System). The above equipment, systems and related programs are further described in e. below.

c. Waste Product Survey ("WPS")

The main mechanism utilized by RIS for tracking each waste stream is the Waste Product Survey ("WPS"). The generator of a waste, (RIS' "client") completes the WPS and certifies that the chemical and physical property data contained in the Survey is correct. RIS confirms the data with fingerprint and additional testing, as described in d. below.

d. Waste Analysis

As specified in its Ohio Hazardous Waste Facility RCRA Part B Permit, RIS performs waste analysis in accordance with its Waste Analysis Plan ("WAP"). The

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WAP contains waste acceptance and approval protocols which describe how waste is approved and analyzed at RIS. Consequently, the WAP is incorporated by reference as part of this FSAP. A copy of RIS' WAP is located in Section C of its Ohio Hazardous Waste Facility RCRA Part B Permit Application, which is maintained by the Corporate EHS Department. Ross Environmental Services, Inc.'s Government Affairs Department also maintains an up-to-date electronic version of the WAP on the shared computer directory.

RIS' WAP satisfies the requirements for a FSAP under 40 CFR §63.1209(c)(2), which are cross-referenced in the Table below:

40 CFR 63.1209(c)(2)	Applicable Cross Reference- RIS WAP Subsection
(i) The parameters to be analyzed for each feedstream to ensure compliance with the incinerator OPLs;	C-2A Parameters and Rationale C-2E Additional Requirements for Waste Generated Off-Site
(ii) Whether the analysis will be obtained by performing sampling and analysis or by other methods, such as using analytical information obtained from others or using other published or documented data or information;	C-2B Test Methods - Generator Profiling C-2E Additional Requirements for Waste Generated Off-Site C-3A Waste Characterization
(iii) How the analysis will be used to document compliance with applicable feedrate limits;	C-2A Parameters and Rationale C-2E Additional Requirements for Waste Generated Off-Site
(iv) The test methods which will be used to obtain the analyses;	C-2B Test Methods – Generator Profiling C-2E Additional Requirements for Waste Generated Off-Site C-3A Waste Characterization
(v) The sampling method which will be used to obtain a representative sample of each feedstream to be analyzed; and	C-2C Sampling Methods
(vi) The frequency with which the initial analysis of the feedstream will be reviewed or repeated to ensure that the analysis is accurate and up to date.	C-2D Frequency of Analysis

One additional testing step, not a part of the WAP, has been added as a result of compliance with the MACT regulations. Waste ash content is checked versus the reported WPS value with the same frequency as metals testing as outlined in the WAP.

WAIVER OF MONITORING OF CONSTITUENTS IN CERTAIN FEEDSTREAMS [40 CFR §63.1209(c)(5)]: RIS is not required to monitor levels of metals or chlorine in the following feedstreams to document compliance with the feedrate limits provided that its MACT Comprehensive Performance Test Plan documents the expected levels of the constituent in the feedstream and accounts for those assumed feedrate levels in documenting compliance with feedrate limits:

- NG,
- process air, and
- feedstreams from vapor recovery systems.

e. Data Tracking

RIS utilizes its main frame computer, the IBM i5, to track waste stream acceptance and approvals, as well as all analytical data received from the customer, performed by the RIS Finger Print Lab, or obtained from a subcontracted lab off-site. As previously indicated, each individual waste stream has its own WPS. This information is used in all waste tracking systems onsite to determine the concentrations of various regulated constituents in the waste stream.

- i. Waste Tracking System: RIS' Waste Tracking System ("WTS") records all the steps in the waste acceptance and testing chain, from the time a container is off-loaded from the vehicle on which it was received, until it is fed into the incineration process. When containerized waste is received at RIS, it is tracked by load ("Shipper") and by its WPS. Each container is assigned its own individual container identification number ("CIN"), and container tracking is performed using bar code labels and scanners which are linked, via radio signals to the RIS local area network ("LAN"), which contains RIS' WTS. See Attachment III for a further description of RIS' current Waste Tracking System.

The WTS is linked to the Rockwell Distributed Control System for the incineration process via the LAN. This connection allows the monitoring of all containerized waste from receipt to the incineration process. It provides information on waste feed rate restrictions, and on the proper feed locations and handling requirements.

- ii. Real-Time Metals Tracking: RIS has implemented a computerized system to continuously calculate the feed rate of the constituents regulated under MACT (e.g., metals, chloride, ash, etc.) on a "real-time" basis. For solid feeds, the system calculates the feed rate of a given constituent as the product of the constituent concentration and the weight of each charge fed to the incineration system. The data for a charge weight and time fed is captured by the WTS system described above. For liquid feeds, the system calculates the feed rate of a given constituent as the product of the constituent concentration and the feed rate (in lbs/hour) for the liquid stream. Liquid waste stream feed rate data is captured by the incineration system monitors.

Composition information for the solid feeds is taken from the WPS data in accordance with the following hierarchy:

- If available, analytical data for the specific container (i.e., CIN) is used.
- If the container is a repacked child, analytical data for the specific parent container, if available.
- In absence of CIN level data, analytical data for the Shipper/ WPS (i.e.,

results from a composite sample) is used.
 - In the absence of any analytical data, the maximum WPS value is used.

Composition information for liquid streams that consist of a single, unblended Shipper/WPS is taken using the same hierarchy as above. However, for liquids that have blended in the tank farm, composition data is entered manually by the Production Planning Group. This composition information is generally developed using worst-case maximum constituent concentrations for the various WPS's stored in a group of tanks.

Based on the composition information and the weight fed (or feed rate for liquids), rolling average feed rates are calculated continuously over the relevant periods. These rolling averages are displayed to the operators and are used to stop waste feed prior to any exceedance of a feed rate limit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(35) Reporting Requirements [40 CFR 63.1209 (c)(2) & (3)]

As specified under applicable MACT regulations, RIS' FSA Plan is simply recorded in the facility operating record, however, RIS recognizes that OEPA has the authority to require RIS to submit its FSA Plan for review and approval.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(36) Record Keeping Requirements [40 CFR 63.1206 (c)(2) & 4)]

As required under applicable MACT regulations, the MACT FSA Plan is maintained in RIS' operating record. The most current, official version of RIS' FSA Plan and associated RIS procedures are the electronic versions which reside in the computer file addresses provided on page 1 of this document. While the locations for paper copies of these documents are also provided for reference, these "hard" copies do not necessarily represent the most current, official version of an RIS Plan or procedure.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(37) *COMPLIANCE WITH FEEDRATE LIMITS:* To comply with the applicable feedrate limits, RIS uses its waste tracking system to monitor and record its feedrates.

(38) Attachment I – MACT Regulatory Requirement/FSA Compliance Plan Cross Reference Table

Regulatory Citation (40 CFR)	Condition	Monitoring	Record Keeping	Reporting	Operating	Planning	Follow-Up	FSA Compliance Plan Cross Reference
63.1209 (c)	(FSAP) Feedstream Analysis Plan							

	<ul style="list-style-type: none"> - This Plan specifies the parameters for analyzing feedstreams to ensure compliance with OPLs. - The Plan is similar to the RCRA Waste Analysis Plan, and therefore, facilities should use the information from their WAP and other sources of waste characterization data to develop the FSAP. - The FSAP must include parameters for analyzing each feedstream, method of performing the analysis, manner in which the data will be used to demonstrate compliance with applicable feed rate limits, test and sampling methods, and frequency of analysis. - The FSAP may be simply recorded in the facility's operating record, however the Agency has the authority to require a facility submit its FSAP for review and approval. 		X	X	X	X		General Preamble language. For reference only. 1.0 Purpose 3.0 Scope 7.0 Reporting Requirements 8.0 Recordkeeping Requirements
63.1209(c)(1)	<i>Analysis of feedstreams - General.</i> Prior to feeding the material, an analysis of each feedstream must be obtained which is sufficient to document compliance with the applicable feedrate limits provided by this section.	X			X			6.2 General Procedures 6.3 Waste Product Survey 6.4 Waste Analysis 6.5 Data Tracking
63.1209(c)(2)	<i>Feedstream analysis plan.</i> A feedstream analysis plan must be developed, implemented, and recorded in the operating record. The plan must specify at a minimum: <ul style="list-style-type: none"> (i) The parameters to be analyzed for each feedstream to ensure compliance with the OPLs of this section; (ii) Whether the analysis will be obtained by performing sampling and analysis or by other methods, such as using analytical information obtained from others or using other published or documented data or information; (iii) How the analysis will be used to document compliance with applicable feedrate limits (e.g., if you blend hazardous wastes and obtain analyses of the wastes prior to blending but not of the blended, as-fired, waste, the plan must describe how you will determine the pertinent parameters of the blended waste); (iv) The test methods which will be used to obtain the analyses; (v) The sampling method which will be used to obtain a representative sample of each feedstream to be analyzed using sampling methods of this chapter, or an equivalent method; and (vi) The frequency with which the initial analysis of the feedstream will be reviewed or repeated to ensure that the analysis is accurate and up to date. 	X			X	X		6.2 General Procedures 6.3 Waste Product Survey 6.4 Waste Analysis 6.5 Data Tracking Attachment III: Waste Tracking System Description RIS Waste Analysis Plan (State RCRA Part B Application – Section C)
63.1209(c)(3)	<i>Review and approval of analysis plan.</i> The feedstream analysis plan must be submitted to the Agency for review and approval, if requested.			X				7.0 Reporting Requirements
63.1209(c)(4)	<i>Compliance with feedrate limits.</i> To comply with the applicable feedrate limits of this section, feedrates must be monitored and recorded as follows: <ul style="list-style-type: none"> (i) Determine and record the value of the parameter for each feedstream by sampling and analysis or other method; (ii) Determine and record the mass or volume flowrate of each feedstream by a CMS. If the flowrate of a feedstream is determined by volume, the density of the feedstream must be determined and recorded by sampling and analysis unless the 	X	X		X			6.0 MACT Feedstream Analysis Procedures 8.0 Recordkeeping Requirements

	constituent concentration is reported in units of weight per unit volume (e.g., mg/l); and (iii) Calculate and record the mass feedrate of the parameter per unit time.							
63.1209(c)(5)	<i>Waiver of monitoring of constituents in certain feedstreams.</i> Sources are not required to monitor levels of metals or chlorine in the following feedstreams to document compliance with the feedrate limits under this section provided that the comprehensive performance test plan documents the expected levels of the constituent in the feedstream and accounts for those assumed feedrate levels in documenting compliance with feedrate limits: natural gas, process air, and feedstreams from vapor recovery systems.	X			X			6.4 Waste Analysis

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(39) Attachment II – MACT Regulatory Definitions (per 40 CFR Part 63.2)

Affected source means the collection of equipment, activities, or both within a single contiguous area and under common control. The term "affected source," as used in Part 63 is separate and distinct from any other use of that term in EPA regulations. Affected source may be defined differently for Part 63 than affected facility and stationary source are in other parts of EPA regulations (e.g., Parts 60 and 61).

Area source means any stationary source of HAPs that is not a major source as defined in this part.

Continuous emission monitoring system ("CEMS") means the total equipment that may be required to meet the data acquisition and availability requirements of this part, used to sample, condition (if applicable), analyze, and provide a record of emissions.

Continuous monitoring system ("CMS") is a comprehensive term that may include, but is not limited to, continuous emission monitoring systems, continuous opacity monitoring systems, continuous parameter monitoring systems, or other manual or automatic monitoring that is used for demonstrating compliance with an applicable regulation on a continuous basis as defined by the regulation.

Fugitive emissions means those emissions from a stationary source that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening. All fugitive emissions are to be considered in determining whether a stationary source is a major source.

Hazardous air pollutant (HAP) means any air pollutant listed in or pursuant to Section 112(b) of the Clean Air Act.

Major source means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the PTE considering controls, in the aggregate, 10 TPY or more of any HAP or 25 TPY or more of any combination of HAPs.

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Malfunction means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Monitoring means the collection and use of measurement data or other information to control the operation of a process or pollution control device or to verify a work practice standard relative to assuring compliance with applicable requirements. Monitoring is composed of four elements:

- a. Indicator(s) of performance—the parameter or parameters you measure or observe for demonstrating proper operation of the pollution control measures or compliance with the applicable emissions limitation or standard. Indicators of performance may include direct or predicted emissions measurements (including opacity), operational parametric values that correspond to process or control device (and capture system) efficiencies or emissions rates, and recorded findings of inspection of work practice activities, materials tracking, or design characteristics. Indicators may be expressed as a single maximum or minimum value, a function of process variables (for example, within a range of pressure drops), a particular operational or work practice status (for example, a damper position, completion of a waste recovery task, materials tracking), or an interdependency between two or among more than two variables.
- b. Measurement techniques—the means by which you gather and record information of or about the indicators of performance. The components of the measurement technique include the detector type, location and installation specifications, inspection procedures, and quality assurance and quality control measures. Examples of measurement techniques include continuous emission monitoring systems, continuous opacity monitoring systems, continuous parametric monitoring systems, and manual inspections that include making records of process conditions or work practices.
- c. Monitoring frequency—the number of times you obtain and record monitoring data over a specified time interval. Examples of monitoring frequencies include at least four points equally spaced for each hour for continuous emissions or parametric monitoring systems, at least every 10 seconds for continuous opacity monitoring systems, and at least once per operating day (or week, month, etc.) for work practice or design inspections.
- d. Averaging time—the period over which you average and use data to verify proper operation of the pollution control approach or compliance with the emissions limitation or standard. Examples of averaging time include a 3-hour average in units of the emissions limitation, a 30-day rolling average emissions value, a daily average of a control device operational parametric range, and an instantaneous alarm.

One-hour period means any 60-minute period commencing on the hour.

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Opacity means the degree to which emissions reduce the transmission of light and obscure the view of an object in the background. For continuous opacity monitoring systems, opacity means the fraction of incident light that is attenuated by an optical medium.

Performance evaluation means the conduct of relative accuracy testing, calibration error testing, and other measurements used in validating the continuous monitoring system data.

Performance test means the collection of data resulting from the execution of a test method (usually three emission test runs) used to demonstrate compliance with a relevant emission standard.

Potential to emit (PTE) means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the stationary source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable.

Shutdown means the cessation of operation of an affected source or portion of an affected source for any purpose.

Six-minute period means, with respect to opacity determinations, any one of the 10 equal parts of a 1-hour period.

Standard conditions means a temperature of 293 K (68°F) and a pressure of 101.3 kilopascals (29.92 in. Hg).

Startup means the setting in operation of an affected source or portion of an affected source for any purpose.

Stationary source means any building, structure, facility, or installation which emits or may emit any air pollutant.

Test method means the validated procedure for sampling, preparing, and analyzing for an air pollutant specified in a relevant standard as the performance test procedure.

Title V Permit means any permit issued, renewed, or revised pursuant to Federal or State regulations established to implement Title V of the Clean Air Act.

Visible emission (VE) means the observation of an emission of opacity or optical density above the threshold of vision.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(40) Attachment III – Waste Tracking System Description

OVERVIEW: The waste tracking system (“WTS”) was developed by RIS in early 1989 to satisfy demands for improved tracking of both inventory and production on non-bulk liquid waste and to take advantage of improvements in data collection technology. The system was installed at the same time the then “new” Container Storage Facility (“CSF”) became operational. During 1994, the waste tracking system was upgraded to improve data accuracy and timeliness of information related to waste tracking from the unloading of containerized waste material through its incineration. A key element of this upgrade was the addition of radio frequency, hand-held bar code readers that instantly record the location of all containers throughout the facility on the computerized tracking system.

WORK FLOW AND SYSTEM NARRATIVE: The following is a narrative description of the work flow:

DRIVER RETURN: A load of containerized material arrives on site and its paper work is reviewed. Any necessary corrections to the computerized shipper data are made and are signed off. This allows the Driver Return to be completed which enables Production Planning to run the Shipper Package Re-Print which generates:

- a. The labels.
- b. Prints the Shipper Activity Summary form.
- c. Prints the lab control shipper sampling requirements sheet.
- d. Prepares a position information work sheet, which lists the process type and drum count for each Waste Product Survey (WPS). This report is used by the Receiving group to facilitate the staging process after the drums have been unloaded at the CSF.
- e. Handling Instructions for each WPS are printed.
- f. Physical Inspection Report (descriptions from each WPS; for lab pack wastes only).

The QA/QC Department attaches a copy of the manifest, and the drum location sheet, if available, to the green process sheet. These documents are taken to the Receiving area.

LOAD PACKET GENERATION: Upon release from the QA/QC Department, the labels placed on each waste container provide confirmation that manifest/shipper differences have been resolved, and that the next step of processing can begin. The label contains the WPS, Shipper, and Storage Classification per compatibility guidelines, and a unique Container Identification Number (“CIN”) in both bar code and readable form.

Production Planning assembles the Load Packet that consists of the Shipper, Handling Instructions, process sheets, copy of manifest, lab control shipper sampling requirement sheet, visual inspection sheet (i.e., a sheet listing all CINs on a load on with physical description and space for writing actual description) and any other related paper work. This packet is completed and available for use by the Receiving Dock.

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UNLOADING AND WEIGHING: Drums and pallets are unloaded at the CSF dock and moved directly to the scale area. Labels are affixed to the container and the label is scanned and the weight entered in the bar code reader. Please note that for palletized material, where the unit of measure in the computer system is PP (or "whole pallet"), only one CIN is assigned per pallet, irrespective of the number of containers on the pallet.

As the weight is entered into the reader, the data updates the inventory detail file. The operator also manually records the weight in grease pencil directly on the drum. The material is then displayed in the tracking system as going from "hold" to "active" status. Receiving personnel will quality control check the CIN label, by comparing it to the physical container to ensure that the size and material of construction matches. Any necessary adjustments are sent to Production Planning for changes. Production Planning also uses the low weight QC program to ensure that the weights entered into the tracking system are logical per the container size and material of construction.

STAGING: As drums come off the scale, they are moved to the staging area at the CSF. There they are grouped by load, where any additional QA/QC work may be completed including visual inspection. During visual inspection, the required number of containers per load are opened and visually inspected and the operators write the description on the visual inspection sheet.

SAMPLING: After scanning and weighing, the sample drums are moved to the Sample area where samples are drawn. Sample jars are labeled with one of the tear off, sub-labels from the bar code label on the container. Selected, sampled containers are indicated on the visual inspection report. When the sample drums are completed, they are moved back to Staging.

RELEASE FOR PROCESSING: Once the Fingerprint Lab's analyses are completed, the Lab "flags" the samples as either accepted or discrepant. The Visual Inspector also reviews the visual inspection sheet and marks on it whether an individual drum is accepted or discrepant. Please note that discrepancy resolution procedures are discussed elsewhere in this document.

CSF STORAGE: After visual inspection, containers are moved to the CSF storage racks/bays (if not sent for processing or repack activities). The coding scheme for the CSF is flexible and operator driven (per compatibility segregation guidelines). Rows, bays and rack levels each have unique bar code labels. As the containers are moved from the staging area, the tow motor operator scans each container's label. As the container is moved into a storage location, the location label is also scanned. This captures the storage location by CIN.

PROCESS DOCK: Drums are moved from their position in the CSF to the process dock via flat bed or van trailer, off loaded and scanned. Just before dock emptying (i.e., pumping), the drum is scanned and "mixing tank" identified. This facilitates downstream tracking of waste stream as it leaves the mixing tank and is transferred to tank farm.

After dock pumping, all RCRA empty drums are scanned with date / time recorded, using same scale procedure as at the CSF. The net weight is recorded in the Tank Farm Inventory and deducted from containerized inventory. Partial drums are re-weighed and

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scanned as indicated above. The weight reduction is added to the Tank Farm Inventory and subtracted from inventory. The CIN master record is updated with the remaining weight. The drum is then staged for return to the CSF.

SET-UP: The Production Planning Department determines what material is to be run based on various factors such as age in inventory, processing needs, material types, metals contents, and physical characteristics. Through their use of the manual group staging program, a menu of drums to be run for a given time period (usually daily) is created. The computer creates a pick list that flags those containers to be loaded to set-up.

CSF operators load the materials from the pick list on to flat beds. They scan the drums and the mobile storage location as the material is moved. They also scan the flat bed to which the container is loaded. When the flat bed is moved from the CSF to the incinerator, it is scanned to indicate the move from storage to incineration setup ("ISU"). If the flatbed is not used and moved back to CSF, it is scanned back to the position to which it is moved.

During selection for processing, Production Planning only uses those drums that have been released for processing ("RFP"). If during the selection process, unreleased drums are selected, the operator receives a warning on his bar code reader indicating "UnRFP" drums.

INCINERATION PROCESS: If flat beds are unloaded for temporary location at the incinerator, the containers are scanned and shown as being in a temporary location at the incinerator. The containers are scanned just prior to processing at each feed location. If the material has processing restrictions (e.g., weight or feed location), the operator receives a message indicating the restriction. Feed conveyors will not operate if restricted drums are loaded. Scanning the container in the Processing area removes the waste from inventory and places its weight in the production / process system as "processed".

SIDE DOOR: Once a container is processed at the side door location, it is removed from the waste tracking system and the time/date processed is indicated. The majority of the containers that have been processed through the side-door, are re-processed through the rotary kiln, and are scanned as "re-runs".

REPACKAGING: Large containers (e.g., roll-off boxes, dump trailers, tote boxes and occasionally drums) have to be repackaged for more efficient processing at the incinerator. The large container goes through the Receiving and Release process as a single container with a single CIN. After release, the Production Planning Department creates repackaging CIN's. These CIN's refer to the new, smaller containers to the original container as "child" / "parent" containers. The "parent" (or original) container is not shown as processed from the inventory until all of the "children" CINs are processed. "Children" retain all the restrictions carried by the original container.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (41) Alternative monitoring requirements other than CEMS
- a. The permittee may submit an application for approval of alternative operating parameter monitoring requirements to document compliance with the emission standards.
 - b. The permittee may submit an application to waive an OPL based on documentation that neither that OPL nor an alternative OPL is needed to ensure compliance with the emission standards.
 - c. The permittee shall comply with the following procedures for applications:
 - i. The application shall be submitted no later than with the CPT plan
 - ii. The application shall include:
 - (a) Data or information justifying the request for an alternative monitoring requirement (or for a waiver of an OPL), such as the technical or economic infeasibility or the impracticality of using the required approach.
 - (b) A description of the proposed alternative monitoring requirement, including the operating parameter to be monitored approach/technique (e.g., type of detector, monitoring location), the averaging period for the limit, and how the limit is to be calculated; and
 - (c) Data or information documenting that the alternative monitoring requirement would provide equivalent or better assurance of compliance with the relevant emission standard, or that it is the monitoring requirement that best assures compliance with the standards and that is technically and economically practicable.
 - iii. The permittee shall be notified by OEPA of approval or intent to deny approval of the request within 90 calendar days after receipt of the original request and within 60 calendar days after receipt of any supplementary information. An alternative monitoring request will not be approved unless the alternative monitoring requirement provides equivalent or better assurance of compliance with the relevant emission standard, or is the monitoring requirement that best assures compliance with the standard and that is technically and economically practicable. Before disapproving any request, OEPA will notify the permittee of the intention to disapprove the request together with:
 - (a) Notice of the information and findings on which the intended disapproval is based; and
 - (b) Notice of opportunity for the permittee to present additional information before final action on the request. At the time that

notification is received, a time will be provided to submit additional information.

- iv. The permittee is responsible for ensuring that any supplementary and additional information supporting the application is submitted in a timely manner.
- d. Dual standards that incorporate the interim standards for HAP metals
 - i. Semivolatile (SVM) and Low volatile metals (LVM)

The permittee may petition to waive a feedrate OPL for either the emission standards expressed in a thermal emissions format or the interim standards based on documentation that the feedrate OPL is not needed to ensure compliance with the relevant standard on a continuous basis.
 - ii. Mercury

The permittee may petition to waive a feedrate OPL for either the feed concentration standard or the interim standards based on documentation that the feedrate OPL is not needed to ensure compliance with the relevant standard on a continuous basis.
- e. OEPA may determine on a case-by-case basis at any time (e.g., during review of the CPT plan, during compliance certification review) that the permittee may need to limit additional or alternative operating parameters (e.g., opacity in addition to or in lieu of OPLs on the particulate matter control device) or that alternative approaches to establish limits on operating parameters may be necessary to document compliance with the emission standards.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (42) When an operating parameter is applicable to multiple standards.

For several parameters, the permittee shall establish a limit for the parameter to ensure compliance with more than one emission standard. An example is a limit on minimum combustion chamber temperature to ensure compliance with both the DRE standard and the dioxin/furan standard. If the performance tests for such standards are not performed simultaneously, the most stringent limit for a parameter derived from independent performance test applies.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (43) Destruction Removal Efficiency (DRE)

To remain in compliance with the DRE standard, the permittee shall establish operating limits during the CPT (or during a previous DRE test) for the following parameters, unless the limits are based on manufacturer specification, and comply with those limits at all times that hazardous waste remains in the combustion chamber (i.e. hazardous waste residence time has not transpired since the hazardous waste feed cutoff system was activated).

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- a. Minimum combustion chamber temperature
 - i. The permittee shall measure the temperature of each combustion chamber at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The temperature measurement location shall be documented in the test plan.
 - ii. The permittee shall establish a minimum hourly rolling average limit as the average of the test run averages.
- b. Maximum flue gas flowrate or production rate
 - i. As an indicator of gas residence time in the control device, the permittee shall establish and comply with a limit on the maximum flue gas flowrate, the maximum production rate, or another parameter that is documented in the site-specific test plan as an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run.
 - ii. The permittee must comply with this limit on an hourly rolling average basis.
- c. Maximum hazardous waste flowrate
 - i. The permittee shall establish limits on the maximum pumpable and total (i.e., pumpable and nonpumpable) hazardous waste feedrate for each location where hazardous waste is fed.
 - ii. The permittee shall establish the limits as the average of the maximum hourly rolling averages for each run.
 - iii. The permittee shall comply with the feedrate limit(s) on an hourly rolling average basis.
- d. Operation of waste firing system

The permittee shall specify operating parameters and limits to ensure that good operation of each hazardous waste firing system is maintained.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(44) Dioxins and Furans

The permittee shall comply with the dioxin and furan emission standard by establishing and complying with the following OPLs. The permittee shall base the limits on operations during the CPT, unless the limits are based on manufacturer specifications.

- a. Minimum combustion chamber temperature
 - i. The permittee shall measure the temperature of each combustion chamber at a location that best represents, as practicable, the bulk gas temperature

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in the combustion zone. The temperature measurement location shall be documented in the test plan.

- ii. The permittee shall establish a minimum hourly average limit as the average of the test runs.
- b. Maximum flue gas flowrate or production rate
 - i. As an indicator of gas residence time in the control device, the permittee shall establish and comply with a limit on the maximum flue gas flowrate, the maximum production rate, or another parameter that is documented in the site-specific test plan as an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run.
 - ii. The permittee shall comply with this limit on an hourly rolling average basis.
- c. Maximum hazardous waste feedrate
 - i. The permittee shall establish limits on the maximum pumpable and total (pumpable and nonpumpable) hazardous waste feedrate for each location where waste is fed.
 - ii. The permittee shall establish the limits as the average of the maximum hourly rolling averages for each run.
 - iii. The permittee shall comply with the feedrate limit(s) on an hourly rolling average basis.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(45) Mercury

The permittee shall base the limits on operations during the CPT, unless the limits are based on manufacturer specifications.

- a. Feedrate of mercury
 - i. The permittee shall establish a 12-hour rolling average limit for the total feedrate of mercury in all feedstreams as the average of the test run averages.
 - ii. In lieu of establishing mercury feedrate limits, the permittee may request as part of the performance test plan to use mercury feedrates and associated emission rates during the CPT to extrapolate to higher allowable feedrate limits and emission rates. The extrapolation methodology will be reviewed and approved, as warranted, by OEPA, the review will consider in particular whether:
 - (a) Performance test metal feedrates are appropriate (whether feedrates are at least at normal levels; depending on the

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heterogeneity of the waste, whether some level of spiking would be appropriate; and whether the physical form and species of spiked material is appropriate) and,

- (b) Whether the extrapolated feedrates requested are warranted considering historical metal feedrate.
- iii. In lieu of complying with 40 CFR 63.1209(l)(1)(i), the permittee may comply with 40 CFR 1207(m) using the MTEC calculations allowed under section (f)(1)(n) – Testing Requirements section of this permit.

b. If a wet scrubber is used for control, then OPLs shall be established.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(46) Particulate matter

The permittee shall base limits on operations during the CPT, unless the limits are based on manufacturer specifications.

a. Control device OPL

Wet scrubbers

- i. For sources equipped with wet scrubbers, including ionizing wet scrubbers, high energy wet scrubbers such as venturi, hydrosonic, collision, or free jet wet scrubbers, and low energy wet scrubbers such as spray towers, packed beds, or tray towers, the permittee shall establish limits on the following parameters:
 - (a) For high energy scrubbers only, minimum pressure drop across the wet scrubber on an hourly rolling average, established as the average of the test run averages;
 - (b) For all wet scrubbers
 - (i) to ensure that solids content of the scrubber liquid does not exceed levels during the performance test, the permittee shall:
 - A) Establish limit on solids content of the scrubber liquid using a CMS or by manual sampling and analysis. If solids content is monitored manually, the permittee shall sample and analyze the scrubber liquid hourly unless an alternative monitoring frequency in the performance test plan is submitted and approved, or
 - B) Establish a minimum blowdown rate using a CMS and either a minimum scrubber tank volume or liquid level using a CMS.

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- (ii) For maximum solids content monitored with a CMS, the permittee shall establish a limit on a 12-hour rolling average as the average of the test runs averages.
 - (iii) For maximum solids content measured manually, the permittee shall establish an hourly limit, as measured at least once per hour, unless an alternative monitoring frequency is supported and approved. The permittee shall establish the maximum hourly limit as the average of the manual measurement averages for each run.
 - (iv) For minimum blowdown rate and either a minimum scrubber tank volume or liquid level using a CMS, the permittee shall establish a limit on an hourly rolling average as the average of the test run averages.
- (c) For high energy wet scrubbers only, the permittee shall establish limits on either the minimum liquid to gas ratio or the minimum scrubber water flowrate and maximum flue gas flowrate on an hourly rolling average. If limits on maximum flue gas flowrate are established, the permittee does not need to establish a limit on maximum flue gas flowrate. The permittee shall establish these hourly rolling average limits as the average of the test run averages.

Other particulate matter control devices

- ii. For each particulate matter control device that is not a fabric filter or high energy wet scrubber, or is not an electrostatic precipitator or ionizing wet scrubber, the permittee shall ensure that the control device is properly operated, maintained, and monitored as follows.
 - (a) During each CPT when particulate matter emissions need to demonstrate compliance, the permittee shall establish a range of operating values for the control device that is representative and a reliable indicator that the control device is operating within the same range as during the test. The permittee shall establish the range of operating values as follows:
 - (i) Select a set of operating parameters appropriate for the control device design that will be determined to be a representative and reliable indicator of the control device performance.
 - (ii) Measure and record values for each of the selected operating parameters during each test run of the performance test. A value for each selected parameter must be recorded using a continuous monitor.

if the permittee complies with the particulate matter detection system requirements.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(47) Semivolatile metals (SVM) and low volatility metals (LVM)

The permittee shall comply with the SVM (cadmium and lead) and LVM (arsenic, beryllium, and chromium) emission standards by establishing and complying with the following OPLs. The permittee shall base limits on operations during the CPT, unless the limits are based on manufacturer specifications.

a. Maximum feedrate of SVM and LVM

i. The permittee shall establish feedrate limits for SVM (cadmium and lead) and LVM (arsenic, beryllium, and chromium). The permittee shall establish 12-hour rolling average limits for the total feedrate of SVM and LVM in all feedstreams as the average of the test run averages.

ii. LVM limits for pumpable wastes. The permittee shall establish separate feedrate limits for LVM in pumpable feedstreams. Dual feedrate limit for both pumpable and total feedstreams are not required if the permittee bases the total feedrate limit solely on the feedrate of pumpable feedstreams.

iii. Extrapolation of feedrate levels. In lieu of establishing feedrate limits as specified above, the permittee may request as part of the performance test plan to use the SVM and LVM feedrates and associated emission rates during the CPT to extrapolate to higher allowable feedrate limits and emission rates. The extrapolation methodology shall be reviewed and approved, as warranted. The review will consider in particular whether:

(a) Performance test metal feedrates are appropriate (i.e., whether feedrates are at least at normal levels; depending on the heterogeneity of the waste, whether some level of spiking would be appropriate; and whether the physical form and species of spiked material is appropriate); and

(b) Whether the extrapolated feedrates requested are warranted considering historical metal feedrate data.

b. The permittee shall establish OPLs on the particulate matter control device.

c. The permittee shall establish a 12-hour rolling average limit for the feedrate of total chlorine and chloride in all feedstreams as the average of the test run averages.

d. As an indicator of gas residence time in the control device, the permittee shall establish a limit on the maximum flue gas flowrate, the maximum production rate, or another parameter that is documented as an appropriate surrogate for gas

residence time, as the average of the maximum hourly rolling averages for each run. The limit shall be set on an hourly rolling average basis.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (48) Hydrogen chloride and chlorine gas. The permittee shall base the limits on operations during the CPT, unless the limits are based on manufacturer specifications.
- a. The permittee shall establish a 12-hour rolling average limit for the total feedrate of chlorine (organic and inorganic) in all feedstreams as the average of the test run averages.
 - b. Maximum flue gas flowrate or production rate. As an indicator of gas residence time in the control device, the permittee shall establish a limit on the maximum flue gas flowrate, the maximum production rate, or another parameter that is an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run. The limit shall be on an hourly rolling average basis.
 - c. Wet Scrubber.
 - i. If a high energy wet scrubber such as a venturi, hydrosonic, collision, or free wet scrubber is used, the permittee shall establish a limit on minimum pressure drop across the wet scrubber on an hourly rolling average as the average of the test run averages.
 - ii. If a low energy wet scrubber such as a spray tower, packed bed, or tray tower is used, the permittee shall establish a minimum pressure drop across the wet scrubber based on manufacturer's specifications. The limit shall be an hourly rolling average.
 - iii. If a low energy wet scrubber is used, the permittee shall establish a limit on minimum liquid feed pressure to the wet scrubber based on manufacturer's specifications. The limit shall be an hourly rolling average.
 - iv. The permittee shall establish a limit on pH on an hourly rolling average as the averages of the test run averages.
 - v. The permittee shall establish limits on either the minimum liquid to gas ratio or the minimum scrubber water flowrate and maximum flue gas flowrate on an hourly rolling average as the average of the test run averages. If a limit on maximum flue gas flowrate is established, the permittee does not need to establish a limit on maximum flue gas flowrate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (49) Maximum combustion chamber pressure

If the permittee maintains the maximum combustion zone pressure lower than the ambient pressure to prevent combustion system leaks, the permittee shall perform instantaneous

monitoring of pressure and the AWFCO system shall be engaged when negative pressure is not adequately maintained.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(50) Operating under different modes of operation

- a. If the permittee operates under different modes of operation, OPLs for each mode must be established. The modes of operation shall be documented in the operating record.
- b. The permittee shall specify these different modes of operation in the Documentation of Compliance (DOC), Notification of Compliance (NOC), and the Title V permit application. These requirements include the otherwise applicable requirements governing emission standards, monitoring and compliance, and notification, reporting, and record keeping.
- c. Calculating rolling averages under different modes of operation.
 - i. The permittee shall calculate rolling averages anew using the continuous monitoring system values previously recorded for that mode of operation (i.e., the permittee ignores continuous monitoring system values subsequently recorded under other modes of operation when transitioning back to a mode of operation) or
 - ii. Calculate rolling averages anew without considering previous recordings.
 - (a) Rolling averages shall be calculated as the average of the available one-minute values for the parameter until enough one-minute values are available to calculate hourly or 12-hour rolling averages, whichever is applicable to the parameter;
 - (b) The permittee shall transition to a new mode of operation using the approach if the most recent operation in that mode resulted in an exceedance of an applicable emission standard measured with a CEMS or OPL prior to the hazardous waste residence time expiring; or
 - (c) Continue calculating rolling averages using data from the previous operating mode provided that both the operating limit and the averaging period for the parameter are the same for both modes of operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(51) Averaging periods.

All averaging periods are not-to-exceed averaging periods. The permittee may elect to use shorter averaging periods.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (52) The permittee shall comply with the applicable record keeping requirements per 40 CFR 63.1211(b):

Reference	Document, Data, or Information
63.1200, 63.10(b) and (c)	General. Information required to document and maintain compliance with the regulations of Subpart EEE, including data recorded by continuous monitoring systems (CMS), and copies of all notifications, reports, plans, and other documents submitted to the Administrator.
63.1206(b)(1)(ii)	If you elect to comply with all applicable requirements and standards promulgated under authority of the Clean Air Act, including Sections 112 and 129, in lieu of the requirements of Subpart EEE when not burning hazardous waste, you must document in the operating record that you are in compliance with those requirements.
63.1206(b)(5)(ii)	Documentation that a change will not adversely affect compliance with the emission standards or operating requirements.
63.1206(b)(11)	Calculation of hazardous waste residence time.
63.1206(c)(2)	Startup, shutdown, and malfunction plan.
63.1206(c)(2)(v)(A)	Documentation of your investigation and evaluation of excessive exceedances during malfunctions.
63.1206(c)(3)(v)	Corrective measures for any automatic waste feed cutoff that results in an exceedance of an emission standard or OPL.
63.1206(c)(3)(vii)	Documentation and results of the automatic waste feed cutoff operability testing.
63.1206(c)(4)(ii)	Emergency safety vent operating plan.
63.1206(c)(4)(iii)	Corrective measures for any emergency safety vent opening.
63.1206(c)(5)(ii)	Method used for control of combustion system leaks.
63.1206(c)(6)	Operator training and certification program.
63.1206(c)(7)(i)(D)	Operation and maintenance plan.
63.1209(c)(2)	Feedstream analysis plan.
63.1209(k)(6)(iii), 63.1209(k)(7)(ii), 63.1209(k)(9)(ii), 63.1209(o)(4)(iii)	Documentation that a substitute activated carbon, dioxin/furan formation reaction inhibitor, or dry scrubber sorbent will provide the same level of control as the original material.
63.1209(k)(7)(i)(C)	Results of carbon bed performance monitoring.
63.1209(g)	Documentation of changes in modes of operation.
63.1211(c)	Documentation of compliance.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart EEE and P0136093]

- (53) The permittee shall monitor the total chlorine and chloride feed rate. On a monthly basis, the permittee shall multiply the feed rate by the emission factor demonstrated in the latest CPT, to calculate the resultant emissions expressed as hydrochloric acid equivalents.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart EEE and P0136093]

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through OEPA's eBusiness Center: Air Services online web portal or mailed as a hard copy to OEPA NEDO.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (2) The permittee shall comply with the following quarterly reporting requirements for the EU and its continuous CO, NO_x, and O₂ monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to OEPA NEDO, documenting all instances of:

- i. continuous O₂ monitoring system downtime and malfunction while the EU was on line;
- ii. NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14, 3745-23, 3745-110, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s); and
- iii. CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:

- i. the facility name and address;
- ii. the manufacturer and model number of the continuous CO, O₂, NO_x and other associated monitors;
- iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
- iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

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- v. the total CO and NO_x emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the EU;
- vii. the total operating time of the continuous CO, O₂, and NO_x monitoring systems while the EU was in operation;
- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO, O₂, and NO_x monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous O₂, CO and NO_x monitoring system, EU, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the EU was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report.

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (3) The permittee shall submit reports within 30 days following the end of each calendar quarter to OEPA NEDO documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any) of all instances of NO_x and CO values in excess of the limitations specified in the terms and conditions of this permit. These reports shall also contain the total NO_x and CO emissions for the calendar quarter (in tons).

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (4) The permittee shall submit reports within 30 days following the end of each calendar quarter to OEPA NEDO documenting all instances of continuous CO, NO_x and O₂

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monitoring system downtime while the EU was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the EU operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of EU malfunctions. The total operating time of the EU and the total operating time of the analyzer while the EU was on line shall be included in the quarterly report. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (5) If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the EU operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of EU, control equipment, and/or monitoring system malfunctions. The total operating time of the EU and the total operating time of the analyzer while the EU was on line shall also be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (6) The permittee shall submit reports within 30 days following the end of each calendar quarter to OEPA NEDO documenting all instances of continuous O₂ monitoring system downtime while the EU was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the EU operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of EU malfunctions. The total operating time of the EU and the total operating time of the analyzer while the EU was on line shall be included in the quarterly report. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (7) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. All periods of time during which the total hourly waste feed to the kiln and main combustion chamber exceeded 26,057 pounds per hour, including the weight of containers, and 105,120 tons per year. The report shall indicate the amount of waste fed during that period.
 - b. Any day in which records were not maintained of the waste feed analysis.
 - c. All periods of time during which waste with a concentration of greater than 50 ppm of PCB was fed to the kiln or to the main combustion chamber. The report shall indicate the amount of waste fed during that period and the PCB concentration.
 - d. All exceedances of the NO_x emission limitation, averaged over a rolling, 12-month period.

- e. All exceedances of the cumulative rolling, 365-day NO_x emission limitation.
- f. All times fuels other than those allowed by c)(3) are used during incinerator start-up. The permittee shall notify OEPA within thirty days (30) following the combustion of any used oil during startup that exceeds the used oil specifications found in c)(4). For this permit condition, start-up shall have the same definition as in c)(3).
- g. Any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, EU(s), or the exhaust stack have been made, a statement to this effect.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (8) The permittee shall submit reports on every ESV opening that occurs while hazardous waste is being combusted. These reports shall contain at a minimum:
 - a. the date and the time(s) the bypass vent was opened and closed;
 - b. the amount of waste in the kiln and the main combustion chamber at the time the vent opened;
 - c. an estimate of air emissions, using the best available data, including emissions of PE, hydrocarbons, hydrogen chloride, SO₂, NO_x, CO, beryllium, lead, mercury, arsenic, cadmium, and chromium; and
 - d. the cause(s) of the ESV opening.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (9) The permittee shall submit a quarterly report within 30 days following the end of each calendar quarter to OEPA NEDO which identifies the hydrochloric acid and chlorine gas emissions, expressed as hydrochloric acid equivalents that occurred over the past 3 months.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (10) The permittee shall submit quarterly deviation reports that
 - a. identify each day in which a Method 9 reading(s) demonstrated an exceedance of the 20% opacity limit;
 - b. describe any corrective actions taken to minimize or eliminate the visible PE; and
 - c. indicate when Method 9 reading(s) were not conducted according to the required schedule. This report shall include the date, duration, and cause for the exceedance. These reports shall be submitted to OEPA NEDO by January 31,

April 30, July 31, and October 31 of each year and shall cover the previous 3-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (11) The permittee shall notify OEPA by April 7 of each year if the total annual benzene quantity equals or exceeds 10 megagrams per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

(12) Changes in design, operation, or maintenance

- a. If the permittee plans to change the design, operation, or maintenance practices of the EU in a manner that may adversely affect compliance with the standard that is not monitored with a CEMS:
- i. Notification - The permittee shall notify OEPA at least 60 days prior to the change, unless circumstances that dictate that such prior notice is not reasonably feasible, is documented. The notification shall include:
 - (a) A description of the changes and which emission standards may be affected; and
 - (b) A CPT schedule and test plan that will document compliance with the affected emission standard.
 - ii. Performance Test - The permittee shall conduct a CPT to document compliance with the affected emission standard and establish OPLs, and submit a NOC.
 - iii. Restriction on waste burning
 - (a) After the change and prior to submitting the NOC, the permittee shall not burn hazardous waste for more than 720 hours and only for the purposes of pretesting or CPT.
 - (b) Prior to submitting the NOC, the permittee may petition OEPA and obtain written approval to burn hazardous waste for purposes other than pretesting or testing. The permittee shall specify operating requirements, including limits on operating parameters that are determined to ensure compliance with the emission standards.
- b. Changes that will not affect compliance - If the permittee determines that a change will not adversely affect compliance with the emissions standards or operating requirements, the permittee shall document the change in the operating record upon making such change. The permittee shall revise as necessary the performance test plan, DOC, NOC, and start-up, shutdown malfunction plan (SSMP) to reflect these changes.

- c. Change means any change in design, operation, or maintenance practices that were documented in the CPT plan, NOC, or SSMP.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(13) Notification of Compliance (NOC)

a. CPT

- i. Within 90 days of completion of a CPT, the permittee shall postmark a NOC documenting compliance with the emission standards and CMS requirements, and identifying OPLs.
- ii. Upon postmark of the NOC, the permittee shall comply with all operating requirements specified in the NOC in lieu of the limits specified in the DOC.

b. CfPT

- i. Within 90 days of completion of a CfPT, the permittee shall postmark a NOC documenting compliance or noncompliance with the applicable dioxin/furan emission standard.

c. The permittee shall include results of performance tests in the NOC.

- d. Time extension - The permittee shall submit a written request for a time extension documenting that, for reasons beyond control, the 90-day deadline requiring submittal of the NOC after completion of the test, may not be able to be met. OEPA shall determine whether a time extension is warranted.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(14) Documentation of compliance (DOC)

- a. The DOC shall identify the applicable emission standards and the limits on the operating parameters that will ensure compliance with the emission standards.

b. The DOC shall contain a signed and dated certification that:

- i. Required CEMS and CMS are installed, calibrated, and continuously operating in compliance with the requirements.
- ii. Based on engineering evaluation prepared in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information and supporting documentation, and considering at a minimum the design, operation, and maintenance characteristics of the combustor and emissions control equipment, the types, quantities, and characteristics of feedstreams, and available emissions data.

- (a) The permittee is in compliance with the emission standards.

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(b) The limits on the operating parameters ensure compliance with the emission standards.

c. The permittee shall comply with the emission standards and OPLs specified in the DOC.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(15) Data compression

The permittee may submit a written request for approval to use data compression techniques to record data from CMS, including CEMS, on a frequency less than required. The request shall be submitted for review and approval as part of the CPT plan.

a. The permittee shall record a data value at least once every ten minutes.

b. For each CEMS or operating parameter for which the permittee requests to use data compression techniques, the permittee shall recommend:

i. A fluctuation limit that defines the maximum permissible deviation of a new data value from a previously generated value without requiring to revert to recording each one-minute value.

(a) If a fluctuation limit is exceeded, the permittee shall record each one-minute value for a period of time not less than ten minutes.

(b) If neither the fluctuation limit nor the data compression limit are exceeded during that period of time, the permittee may reinitiate recording data values on a frequency of at least once each ten minutes.

ii. A data compression limit defined as the closest level to an OPL or emission standard at which reduced data recording is allowed.

(a) Within this level and the OPL or emission standard, the permittee shall record each one-minute average.

(b) The data compression limit should reflect a level at which the permittee is likely to exceed the specific OPL or emission standard, considering its averaging period, with the addition of a new one-minute average.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(16) Certification of intent to comply

The Notice of Intent to Comply (NIC) shall contain the following certification signed and dated by a responsible official. "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible

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for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.”

- a. New Units - Any facility that files a RCRA permit application or permit modification request for construction of a hazardous waste combustion unit after October 12, 2005 shall:
 - i. Prepare a NIC and make it available to the public upon issuance of the notice of NIC public meeting;
 - ii. Prepare a draft CPT plan and make it available for public review upon issuance of the notice of NIC public meeting;
 - iii. Provide notice to the public of a pre-application meeting or notice to the public of a permit modification request; and
 - iv. Hold an informal public meeting 30 days following notice of NIC public meeting and notice of the pre-application meeting or notice of the permit modification request.
- b. Information repository specific to new combustion units - Any facility that files a RCRA permit application or permit modification request for construction of a hazardous waste combustion unit after October 12, 2005 may be required to establish an information repository if deemed appropriate:
 - i. On a case-by-case basis for an information repository - when assessing the need for a repository, it shall be considered the level of public interest, the presence of an existing repository, and any information available via the New Source Review and Title V permit processes. The permittee shall be notified if a repository needs to be established.
 - ii. The information repository shall contain all documents, reports, data, and information deemed necessary.
 - iii. It shall be located and maintained at a site chosen by the permittee. If it is found the site is unsuitable for the purposes and persons for which it was established, due to problems with location, hours of availability, access, or other relevant considerations, then a more appropriate site shall be chosen.
 - iv. A written notice about the information repository to all individuals on the permittee mailing list.
 - v. The permittee shall be responsible for maintaining and updating the repository with appropriate information throughout the period specified.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart EEE]

- (17) The permittee shall submit the following notifications to the Administrator per 40 CFR 63.1210(a)(1):

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Reference	Notification
63.9(b)	Initial notifications that you are subject to Subpart EEE of this Part.
63.9(d)	Notification that you are subject to special compliance requirements.
63.9(j)	Notification and documentation of any change in information already provided under §63.9.
63.1206(b)(5)(i)	Notification of changes in design, operation, or maintenance.
63.1206(c)(8)(iv)	Notification of excessive bag leak detection system exceedances.
63.1206(c)(9)(v)	Notification of excessive particulate matter detection system exceedances.
63.1207(e), 63.9(e) 63.9(g)(1) and (3)	Notification of performance test and continuous monitoring system evaluation, including the performance test plan and CMS performance evaluation plan. ¹
63.1210(b)	Notification of intent to comply.
63.1210(d), 63.1207(j), 63.1207(k), 63.1207(l), 63.9(h), 63.10(d)(2), 63.10(e)(2)	Notification of compliance, including results of performance tests and continuous monitoring system performance evaluations.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart EEE and P0136093]

- (18) The permittee shall submit the following notifications to the Administrator if the permittee requests or elects to comply with alternative requirements, per 40 CFR 63.1210(a)(2):

Reference	Notification, request, petition, or application
63.9(i)	You may request an adjustment to time periods or postmark deadlines for submittal and review of required information.
63.10(e)(3)(ii)	You may request to reduce the frequency of excess emissions and CMS performance reports.
63.10(f)	You may request to waive recordkeeping or reporting requirements.
63.1206(b)(4), 63.1213, 63.6(i), 63.9(c)	You may request an extension of the compliance date for up to one year.
63.1206(b)(5)(i)(C)	You may request to burn hazardous waste for more than 720 hours and for purposes other than testing or pretesting after making a change in the design or operation that could affect compliance with emission standards and prior to submitting a revised Notification of Compliance.

63.1206(b)(8)(iii)(B)	If you elect to conduct particulate matter CEMS correlation testing and wish to have federal particulate matter and opacity standards and associated operating limits waived during the testing, you must notify the Administrator by submitting the correlation test plan for review and approval.
63.1206(b)(8)(v)	You may request approval to have the particulate matter and opacity standards and associated operating limits and conditions waived for more than 96 hours for a correlation test.
63.1206(b)(14)	Owners and operators of incinerators may elect to comply with an alternative to the particulate matter standard.
63.1206(c)(2)(ii)(C)	You may request to make changes to the startup, shutdown, and malfunction plan.
63.1206(c)(5)(i)(C)	You may request an alternative means of control to provide control of combustion system leaks.
63.1206(c)(5)(i)(D)	You may request other techniques to prevent fugitive emissions without use of instantaneous pressure limits.
63.1207(c)(2)	You may request to base initial compliance on data in lieu of a comprehensive performance test.
63.1207(d)(3)	You may request more than 60 days to complete a performance test if additional time is needed for reasons beyond your control.
63.1207(e)(3), 63.7(h)	You may request a time extension if the Administrator fails to approve or deny your test plan.
63.1207(h)(2)	You may request to waive current OPLs during pretesting for more than 720 hours.
63.1207(f)(1)(ii)(D)	You may request a reduced hazardous waste feedstream analysis for organic hazardous air pollutants if the reduced analysis continues to be representative of organic hazardous air pollutants in your hazardous waste feedstreams.
63.1207(g)(2)(v)	You may request to operate under a wider operating range for a parameter during confirmatory performance testing.
63.1207(i)	You may request up to a one-year time extension for conducting a performance test (other than the initial comprehensive performance test) to consolidate testing with other state or federally-required testing.
63.1207(j)(4)	You may request more than 90 days to submit a Notification of Compliance after completing a performance test if additional time is needed for reasons beyond your control.
63.1207(l)(3)	After failure of a performance test, you may request to burn hazardous waste for more than 720 hours and for purposes other than testing or pretesting.

63.1209(a)(5), 63.8(f)	You may request: (1) Approval of alternative monitoring methods for compliance with standards that are monitored with a CEMS; and (2) approval to use a CEMS in lieu of OPLs.
63.1209(g)(1)	You may request approval of: (1) Alternatives to operating parameter monitoring requirements, except for standards that you must monitor with a continuous emission monitoring system (CEMS) and except for requests to use a CEMS in lieu of OPLs; or (2) a waiver of an OPL.
63.1209(l)(1)	You may request to extrapolate mercury feedrate limits.
63.1209(n)(2)	You may request to extrapolate semivolatile and low volatile metal feedrate limits.
63.1211(d)	You may request to use data compression techniques to record data on a less frequent basis than required by §63.1209.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart EEE and P0136093]

- (19) The permittee shall submit the following reports to the Administrator, per 40 CFR 63.1211(a):

Reference	Report
63.10(d)(4)	Compliance progress reports, if required as a condition of an extension of the compliance date granted under §63.6(i).
63.10(d)(5)(i)	Periodic startup, shutdown, and malfunction reports.
63.10(d)(5)(ii)	Immediate startup, shutdown, and malfunction reports.
63.10(e)(3)	Excessive emissions and continuous monitoring system performance report and summary report.
63.1206(c)(2)(ii)(B)	Startup, shutdown, and malfunction plan.
63.1206(c)(3)(vi)	Excessive exceedances reports.
63.1206(c)(4)(iv)	Emergency safety vent opening reports.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart EEE and P0136093]

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

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a. Emission Limitation:

PE from the stack shall not exceed 0.013 grain/dscf corrected to 7% oxygen.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with 63.1208(b)(6).

b. Emission Limitation:

PE from the stack shall not exceed 50.37 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$TPY = E \times CFM \times 60 \times H / (7000 \times 2000)$$

where:

TPY = emission rate, TPY;

E = emission rate as measured during most recent test, grain/dscf at 7% oxygen;

CFM = average flow rate of flue gas, dscfm;

60 = conversion factor, minutes per hour;

H = annual hours incinerator was operating, hrs/year;

7000 = conversion factor, grains per dscf; and

2000 = conversion factor, pounds per ton.

c. Emission Limitation:

NO_x emissions shall not exceed 18.21 tons per month averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission records maintained by operating the CEMS for NO_x, provided that the system meets the requirements of 40 CFR Part 60, Appendix B, and through the record keeping requirements contained in this permit.

d. Emission Limitation:

The emissions of NO_x from this EU shall not exceed 218.5 tons, based upon a cumulative, rolling 365-day summation of the nitrogen oxides emissions.

Applicable Compliance Method:

At the end of each day, the permittee shall add (or maintain the sum of) the daily records of the hourly NO_x emissions, from the previous 365-day period, as was documented by the continuous NO_x monitoring system. For any period of

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operating time not recorded by the continuous NO_x monitoring system, the average hourly emission rate from the closest period of time for which the monitor was properly operating will be added for the missing hours of operation not recorded.

e. Emission Limitation:

NO_x emissions from this EU, with a rated maximum capacity of 26,057 lbs/hr of waste materials, shall not exceed 158.1 lbs/hr, based on a rolling 24 hour average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission records maintained by operating the CEMS for NO_x, provided that the system meets the requirements of 40 CFR Part 60, Appendix B, and through the record keeping requirements contained in this permit.

f. Emission Limitation:

SO₂ emissions shall not exceed 15.1 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emissions testing using 40 CFR Part 60, Appendix A, Method 6C or equivalent method.

g. Emission Limitation:

SO₂ emissions shall not exceed 66.14 TPY.

Applicable Compliance Method:

This limit was set at the potential of the unit by multiplying the allowable hourly emissions limit (15.1 lbs/hr) by the maximum possible operating hours (8760 hours/yr), and dividing by 2000 (lbs/ton). Therefore, provided that compliance with the hourly limit is met, compliance with the annual limit is also met. In order to accurately report annual emissions, the actual hours of operation and the pound per hour results from the most recent stack test may be used to calculate emissions for reporting requirements.

h. Emission Limitation:

CO emissions shall not exceed 100 ppm by volume, over an hourly rolling average, on a dry basis, and corrected to 7% oxygen.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission records maintained by operating the CEMS for CO, provided that system meets the requirements of 40 CFR Part 60, Appendix B, and through the record keeping requirements

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contained in this permit. If required by OEPA, 40 CFR Part 60, Appendix A, Method 10 testing shall be conducted in order to demonstrate compliance.

i. Emission Limitation:

CO emissions shall not exceed 179.6 TPY.

Applicable Compliance Method:

At the end of each year the permittee shall add the daily (or if totaled monthly) records of the sum of each hourly record of CO emissions, as was documented by the continuous CO monitoring system. For any period of operating time not recorded by the continuous CO monitoring system, the average hourly emission rate from the closest period of time for which the monitor was properly operating will be added for the missing hours of operation not recorded.

j. Emission Limitation:

Hydrocarbon emissions shall not exceed 10 ppm by volume, over an hourly rolling average, on a dry basis, corrected to 7% oxygen, reported as propane.

Applicable Compliance Method:

Compliance shall be demonstrated through emissions testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 25 or 25A.

k. Emission Limitation:

Hydrocarbon emissions shall not exceed 22.56 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$\text{TPY} = E \times \text{MW} \times 60 \times \text{CFM} \times H / (24.45 \times 35.31 \times 1000 \times 454 \times 2000)$$

where:

TPY = emission rate, TPY;

E = emission rate as measured during most recent test, ppm at 7% oxygen;

MW = molecular weight of hydrocarbons in stack test;

CFM = average flow rate of flue gas, dscfm;

60 = conversion factor, minutes per hour;

H = annual hours incinerator was operating, hrs/year;

24.45 = conversion factor, ppm to mg/cubic meter;

35.31 = conversion factor, cubic feet per cubic meter;

1000 = conversion factor, milligrams per gram; and

2000 = conversion factor, pounds per ton.

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l. Emission Limitation:

Lead and cadmium emissions, combined, shall not exceed 230 ug/dscm corrected to 7% oxygen.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emissions testing performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 29.

m. Emission Limitation:

Hydrochloric acid and chlorine gas emissions, combined, expressed as a chloride equivalent, shall not exceed 32 ppm by volume, on a dry basis, corrected to 7% oxygen.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 26A, 40 CFR Part 63, Appendix A, Method 320 and/or 40 CFR Part 63, Appendix A, Method 321.

n. Emission Limitation:

Hydrochloric acid and chlorine gas emissions, expressed as hydrochloric acid equivalents, shall not exceed 10 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equation and summing the monthly hydrochloric acid equivalents on an annual basis:

Tons HCl equivalents per month = tons chlorine/chloride fed per month x CPT emission factor

where:

Tons chlorine/chloride fed per month = monthly total chlorine/chloride feed rate in d)(51); and

CPT emission factor = emission factor established during the last Comprehensive Performance Test (CPT) that demonstrated compliance in units of mass HCl equivalents per mass chlorine/chloride feed.

o. Emission Limitation:

Mercury emissions shall not exceed 130 ug/dscm corrected to 7% oxygen.

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Applicable Compliance Method:

- i. Compliance shall be demonstrated based upon emissions testing performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 29.
- ii. Ongoing compliance shall be demonstrated by using the following equation:

$$\text{MTEC} = [\text{Hg Feed (ug/s)}]/[\text{Corrected Stack Flow (dsm}^3\text{/s@7\% oxygen)}]$$

$$[\text{Hg Feed (ug/s)}] = [\text{Hg Feed (lb/hr)}]/3600 \times 4.536\text{e}8$$

$$[\text{Corrected Stack Flow (dsm}^3\text{/s@7\% oxygen)}] = 1000 \times [\text{CEM Stack Flow (kacfm)}] \times [\text{Stack Flow Ratio (dscf/acf, wet)}] \times (20.9 - [\text{CEM Dry O}_2\text{ (\%)}])/13.9/60/35.3$$

where:

Hg Feed (lb/hr) = the 1-hour rolling average feed rate of mercury from the permittee's real time feed rate calculations;

Stack Flow Ratio (dscf/acf, wet) = the factor to correct the actual stack flow to dry standard conditions, based on the Condition 2 measurements in the permittee's most recent Comprehensive Performance Test that demonstrated compliance (0.851 in the 2016 CPT);

CEM = continuous emissions monitor;

CEM Stack Flow (kacfm) = the 1-hour rolling average stack flow from the permittee's CEMs;

CEM Dry O₂ (%) = the 1-hour rolling average dry oxygen from the permittee's CEMs;

3600 = seconds/hour;

4.536e8 = micrograms/pound;

1000 = acfm/kacfm;

(20.9 - [CEM Dry O₂ (%)])/13.9 = the expression for correcting the stack flow to 7% oxygen;

60 = seconds/minute; and

35.3 = cubic feet/cubic meter.

p. Emission Limitation:

Beryllium emissions shall not exceed 10 grams per 24 hour period and 0.004 ton per year. In addition, arsenic, beryllium and chromium emissions together shall not exceed 92 ug/dscm corrected to 7% oxygen.

Applicable Compliance Method:

Compliance with the short-term beryllium emission limitation shall be demonstrated based upon emissions testing performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 29, and converting the beryllium testing results to the equivalent of grams per 24 hours.

The tpy emission limitation was developed by multiplying the short-term allowable beryllium emission limitation (10 grams per 24-hour period) by 24 hours per day and 365 days of operation per year, and then dividing by 454 grams per pound and by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

Compliance with the combined arsenic, beryllium and chromium emission limitation shall be demonstrated based upon emissions testing performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 29.

q. Emission Limitation:

Dioxins and furans emissions shall not exceed 0.40 ng TEQ/dscm, corrected to 7% oxygen.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emissions testing performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 23 or 23A, as described in the relevant Performance Test Plan.

r. Emission Limitation:

Visible PE from any stack serving this EU shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon VE observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

s. Emission Limitation:

The incinerator system shall achieve a DRE of 99.99% for each selected POHC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emissions testing performed in accordance with the procedures specified in the appropriate U.S. EPA Reference Methods for each selected POHC.

[[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (2) The permittee shall conduct, or have conducted, emission testing for EU N001 in accordance with the following requirements:
 - a. Stack testing shall be conducted as follows:
 - i. In order to demonstrate compliance, the following testing shall be conducted:
 - (a) Comprehensive performance testing must be conducted to demonstrate compliance with the emission standards set forth in 40 CFR 63.1219, establish limits for the operating parameters provided in 40 CFR 63.1209, and demonstrate compliance with the performance specifications for continuous monitoring systems. Testing shall commence no later than 61 months after the date of commencing the previous comprehensive performance test. If data have been submitted in lieu of the initial performance test, the permittee must commence the subsequent comprehensive performance test within 61 months of commencing the test used to provide the data in lieu of the initial performance test.
 - (b) Confirmatory performance testing must be conducted to demonstrate compliance with the emission standards for dioxin and furan, as set forth in 40 CFR 63.1219. Confirmatory performance testing shall be conducted no later than 31 months after the date of commencing the previous comprehensive performance test. If data have been submitted in lieu of the initial performance test, the permittee must commence the initial confirmatory performance test within 31 months of the date six months after the compliance date. The confirmatory performance test shall be conducted approximately midway between comprehensive performance tests.
 - ii. If required, additional testing may be requested by OEPA NEDO.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rates for particulate emissions, lead and cadmium, hydrochloric acid and chlorine gas, mercury, arsenic, beryllium, and chromium, hydrocarbons, dioxin and furans and the destruction and removal efficiency requirement for selected POHC(s). Compliance shall be documented based on the arithmetic average of the emissions results of each run. The destruction and removal efficiency standard must be met for each run of the performance test. During any comprehensive performance test, the permittee shall establish the

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following operating parameters, which shall be maintained as required by the final standards for 40 CFR Part 63, Subpart EEE, after compliance has been demonstrated and upon receipt of the testing results:

- i. the minimum temperature in the kiln and in main combustion chamber;
 - ii. the minimum water flow rate and the maximum flue gas flowrate; or the minimum liquid to gas ratio in the radial-flow venturi scrubber;
 - iii. minimum pressure drop across the radial-flow venturi scrubber;
 - iv. the maximum solids content of the radial-flow venturi and gas-liquid contactor; or the minimum blowdown rate and either the minimum scrubber tank volume or minimum liquid level;
 - v. the minimum pH of the scrubber liquor in gas-liquid contractor;
 - vi. the minimum liquid feed pressure to the gas-liquid contactor;
 - vii. the maximum flue gas flowrate and/or maximum production/process weight rate; and
 - viii. the maximum waste feed rate, not to exceed 26,057 pounds per hour, including the weight of containers, and 105,120 tons per year.
- c. The test(s) shall be conducted while the EU is operating at or near its maximum capacity, unless otherwise specified or approved by OEPA NEDO.
- d. In order to demonstrate compliance with the destruction and removal efficiency requirement for POHC, the following equation shall be calculated:

$$DRE = [1 - (W_{out}/W_{in}) \times 100\%]$$

where:

W_{in} = mass feedrate of selected POHC in a waste feedstream; and

W_{out} = mass emission rate of the same POHC present in exhaust emissions.

The permittee shall submit to OEPA NEDO a test methodology for each selected POHC which will be burned in the incinerator, as well as each site-specific test plan and CMS performance evaluation test plan for any comprehensive and confirmatory performance tests.

- e. The permittee shall record the weight, in pounds, of all liquid, semi-solid and solid waste charged during any stack test conducted to demonstrate compliance.
- f. Personnel from OEPA NEDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that

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the operation of the EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests (i.e. stack test contractor) and submitted to OEPA NEDO within 30 days following completion of the test(s).
- h. The frequency of stack testing and test methods conducted shall be determined with the promulgation of 40 CFR Part 63, Subpart EEE, the final rule, and/or as required by any other applicable regulation. The Notification of Compliance shall be submitted following each subsequent comprehensive and confirmatory performance test.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (3) Ongoing compliance with the NO_x and CO emissions limitations and O₂ monitoring requirements contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- (4) Methods for determining compliance

Conducting performance testing under operating conditions representative of the extreme range of normal conditions is consistent with the requirements to conduct performance testing under representative operating conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (5) Documenting compliance with the standards based on performance testing

- a. The permittee shall conduct a minimum of three runs of a performance test to document compliance with the emission standards.
- b. The permittee shall document compliance with the emission standards based on the arithmetic average of the emission results of each run, except the permittee shall document compliance with the DRE standard for each run of the CPT individually.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(6) Comprehensive performance test (CPT)

The permittee shall conduct a CPT to demonstrate compliance with the emission standards, establish limits for the operating parameters, and demonstrate compliance with the performance specifications for CMS.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(7) Confirmatory performance test (CfPT)

The permittee shall conduct CfPT to:

- a. Demonstrate compliance with the dioxin/furan emission standard when operating under normal conditions; and
- b. Conduct a performance evaluation of CMS required for compliance assurance with the dioxin/furan emission standard.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(8) Frequency of testing

The date of commencement of the initial CPT is the basis for establishing the deadline to commence the initial CfPT and the next CPT. The permittee may conduct performance testing at any time prior to the required data. The deadline for commencing subsequent CfPT and CPT is based on the date of commencement of the previous CPT. Unless a time extension is granted, the permittee shall conduct testing as follows:

- a. CPT - Testing shall be commenced no later than 61 months after the date of commencing the previous CPT.
- b. CfPT - Testing shall be commenced no later than 31 months after the date of commencing the previous CPT. To ensure the CfPT is conducted approximately midway between CPTs, OEPA will not approve a test plan that schedules testing within 18 months of commencing the previous CPT.
- c. Duration of testing - the permittee shall complete performance testing within 60 days after the date of commencement, unless OEPA determines that a time extension is warranted based on documentation in writing of factors beyond the permittees control that prevent meeting the 60-day deadline.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(9) Notification of performance test and CMS performance evaluation, and approval of test plan and CMS performance evaluation plan.

- a. CPT - The permittee shall submit a notification of intent to conduct a CPT and CMS performance evaluation and a site-specific test plan and CMS performance evaluation test plan at least one year before the performance evaluation is scheduled to begin.

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- i. The permittee shall be notified of approval or intent to deny approval of the site-specific test plan and CMS performance evaluation test plan within 9 months after receipt of the original plan.
- ii. The permittee shall submit a notification of intent to conduct the CPT at least 60 calendar days before the test is scheduled to begin.
- b. CfPT - The permittee shall submit a notification of intent to conduct a CfPT and CMS performance test and CMS performance evaluation and a site-specific test plan and CMS performance evaluation test plan at least 60 calendar days before the performance test is scheduled to begin.
 - i. The permittee shall be notified of approval or intent to deny approval of the site-specific test plan and CMS performance evaluation test plan within 30 calendar days after receipt of the original plan.
- c. The test plan and CMS performance evaluation test plan shall be available to the public for review no later than 60 calendar days before initiation of the test. The permittee shall issue a public notice to all persons on their facility/public mailing list announcing the availability of the test plans and the location where the test plans are available for review. The test plans shall be accessible to the public for 60 calendar days, beginning on the date that the public notice is issued. The location must be unrestricted and provide access to the public during reasonable hours and provide a means for the public to obtain copies. The notification must include the following at a minimum:
 - i. The name and telephone number of the facility's contact person;
 - ii. The name and telephone number of the regulatory agency's contact person;
 - iii. The location where the test plans and any necessary supporting documentation can be reviewed and copied;
 - iv. The time period for which the test plans will be available for public review; and
 - v. An expected time period for commencement and completion of the performance test and CMS performance evaluation test.
- d. Time extension - The permittee may petition to obtain a "waiver" of any performance test. The "waiver" would be implemented as an extension of time to conduct the performance test at a later date.
 - i. Qualifications for the waiver.
 - (a) The permittee may not petition for a waiver if OEPA has issued a notification of intent to deny the test plan.

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- (b) The permittee shall submit site-specific emissions testing plan and a CMS performance evaluation test plan at least one year before a CPT is scheduled to begin or at least 60 days before a CfPT is scheduled to begin.
- ii. Procedures for obtaining a waiver and duration of waiver
 - (a) The permittee shall submit a waiver petition or request to renew the petition separately for each source at least 60 days prior to the scheduled date of the performance test.
 - (b) OEPA will approve or deny the petition within 30 days of receipt and notify the permittee promptly of the decision.
 - (c) OEPA will not approve an individual waiver petition for a duration exceeding 6 months.
 - (d) OEPA will include a sunset provision in the waiver ending the waiver within 6 months.
 - (e) The permittee may submit a revised petition to renew the waiver at least 60 days prior to the end date of the most recently approved waiver petition.
 - (f) OEPA may approve a revised petition for a total waiver period up to 12 months.
- iii. Content of the waiver
 - (a) The permittee shall provide documentation to enable a determination that the EU is meeting the relevant standards on a continuous basis.
 - (b) The permittee shall include in the petition information justifying a waiver request, such as the technical or economic infeasibility or the impracticality, of the affected EU performing the test.
- iv. Public notice
 - (a) At the time the petition is submitted, the permittee shall notify the public (e.g. distribute a notice to the facility/public mailing list) of the petition to waive a performance test. The notification shall include all of the following information at a minimum:
 - (i) The name and telephone number of the permittee's contact person;
 - (ii) The name and telephone number of the regulatory agency's contact person;

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- (iii) The date the performance test plan and CMS performance evaluation test plan was submitted; and
- (iv) The length of time requested for the waiver.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (10) Content of performance test - The following information shall be included in the test plan:
- a. Content of CPT plan
 - i. An analysis of each feedstream, including hazardous waste, other fuels, and industrial furnace feedstocks, as fired, that includes:
 - (a) Heating value, levels of ash (for hazardous waste incinerators only), levels of SVM, LVM, mercury, and total chlorine (organic and inorganic); and
 - (b) Viscosity or description of the physical form of the feedstream.
 - ii. For organic hazardous air pollutants, excluding caprolactam
 - (a) An identification of such organic hazardous air pollutants that are present in each hazardous waste feedstream. No analysis for organic hazardous air pollutants that would reasonably not be expected to be found in the feedstream. Any constituents that are excluded from analysis, shall be explained the basis for excluding them.
 - (b) An approximate quantification of such identified organic hazardous air pollutants in the hazardous waste feedstreams, within the precision produced by analytical procedures.
 - (c) A description of blending procedures, if applicable, prior to firing the hazardous waste feedstream, including a detailed analysis of the materials prior to blending, and blending ratios.
 - (d) OEPA may approve on a case-by-case basis a hazardous waste feedstream analysis for organic hazardous air pollutants in lieu of the analysis required, if the reduced analysis is sufficient to ensure that the POHCs used to demonstrate compliance with the applicable DRE standards continue to be representative of the most difficult to destroy organic compounds in the hazardous waste feedstreams.
 - iii. A detailed engineering description of the hazardous waste combustor, including:
 - (a) Manufacturer's name and model number of the hazardous waste combustor;

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- (b) Type of hazardous waste combustor;
 - (c) Maximum design capacity in appropriate units;
 - (d) Description of the feed system for each feedstream;
 - (e) Capacity of each feed system;
 - (f) Description of automatic hazardous waste feed cutoff systems;
 - (g) Description of the design, operation, and maintenance practices for any air pollution control system; and
 - (h) Description of the design, operation, and maintenance practices of any stack gas monitoring and pollution control monitoring systems.
- iv. A detailed description of sampling and monitoring procedures including sampling and monitoring locations in the system, the equipment to be used, sampling and monitoring frequency, and planned analytical procedures for sample analysis.
 - v. A detailed test schedule for each hazardous waste for which the performance test is planned, including dates, duration, quantity of hazardous waste to be burned, and other relevant factors.
 - vi. A detailed test protocol, including, for each hazardous waste identified, the ranges of hazardous waste feedrate for each feed system, and as appropriate, the feedrates of other fuels and feedstocks, and any other relevant parameters that may affect the ability of the hazardous waste combustor to meet the emission standards.
 - vii. A description of, and planned operating conditions for, any emission control equipment that will be used.
 - viii. Procedures for rapidly stopping the hazardous waste feed and controlling emissions in the event of an equipment malfunction.
 - ix. A determination of the hazardous waste residence time.
 - x. And the following if extrapolating metal feedrate limits from the CPT:
 - (a) A description of the extrapolation methodology and rationale for how the approach ensures compliance with the emission standards;
 - (b) Documentation of the historical range of normal (i.e., other than during compliance testing) metals feedrates for each feedstream; and

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- (c) Documentation that the level of spiking recommended during the performance test will mask sampling and analysis imprecision and inaccuracy to the extent that the extrapolated feedrate limits adequately assure compliance with the emission standards.
 - xi. If the permittee does not continuously monitor regulated constituents in natural gas, process air feedstreams, and feedstreams from vapor recovery systems, the permittee shall include documentation of the expected levels of regulated constituents in those feedstreams.
 - xii. Documentation justifying the duration of system conditioning required to ensure the combustor has achieved steady-state operations under performance test operating conditions.
 - xiii. If the permittee is not required to conduct performance testing to document compliance with the mercury, SVM, LVM, or hydrogen chloride/chlorine gas emission standards, the permittee shall include with the CPT plan documentation of compliance.
 - xiv. If the permittee proposes to use a surrogate for measuring or monitoring gas flowrate, it must be documented in the CPT plan that the surrogate adequately correlates with gas flowrate.
 - xv. The permittee shall submit an application to request alternative monitoring not later than with the CPT plan.
 - xvi. The permittee shall document the temperature location measurements in the CPT plan.
 - xvii. For purposes of calculating SVM, LVM, mercury, and total chlorine (organic and inorganic), and ash feedrate limits, a description of how the performance test feedstream analytical results that determines these constituents are not present at detectable levels.
 - xviii. Such other information reasonably found to be necessary to determine whether to approve the performance test plan.
- b. Content of CfPT
- i. A description of normal hydrocarbon or carbon monoxide operating levels and an explanation of how the normal levels were determined.
 - ii. A description of normal applicable operating parameter levels and an explanation of how the normal levels were determined.
 - iii. A description of the normal chlorine operating levels and an explanation of how the normal levels were determined.
 - iv. A detailed description of sampling and monitoring procedures including sampling and monitoring locations in the system, the equipment to be used,

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sampling and monitoring frequency, and planned analytical procedures for sample analysis.

- v. A detailed test schedule for each hazardous waste for which the performance test is planned, including dates, duration, quantity of hazardous waste to be burned, and other relevant factors.
- vi. A detailed test protocol including, for each hazardous waste identified, the ranges of hazardous waste feed rate for each feed system, and, as appropriate, the feedrates of other fuels and feedstocks, and any other relevant parameters that may affect the ability of the hazardous waste combustor to meet the dioxin/furan emission standard.
- vii. A description of, and planned operating conditions for, any emission control equipment that will be used.
- viii. Procedures for rapidly stopping the hazardous waste feed and controlling emissions in the event of an equipment malfunction.
- ix. Such other information as reasonably found to be necessary to determine whether to approve the CfPT.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(11) Operating conditions during testing

a. CPT

- i. For the following parameters, the permittee shall operate the combustor during the performance test under normal conditions (or conditions that will result in higher than normal emissions).
 - (a) Chlorine feedrate - The permittee shall feed normal (or higher) levels of chlorine during the dioxin/furan performance test.
 - (b) Ash feedrate - The permittee shall conduct the following tests when feeding normal (or higher) levels of ash: The SVM and LVM performance tests, and the dioxin/furan and mercury performance tests if activated carbon injection or a carbon bed is used.
 - (c) Cleaning cycle of the particulate matter control device - The permittee shall conduct the following tests when the particulate matter control device undergoes its normal (or more frequent) cleaning cycle: The particulate matter, SVM and LVM performance tests and the dioxin/furan and mercury performance tests if activated carbon injection or a carbon bed is used.
- ii. Modes of operation - The permittee may conduct the testing under two or more operating modes to provide operating flexibility.

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- iii. Steady-state conditions. - Prior to obtaining performance test data, the permittee shall operate under performance test conditions until steady-state operations, with respect to emissions of pollutants and operating parameters. During system conditioning, the permittee shall ensure that each operating parameter, for which a limit is being established, is held at the level planned for the performance test. The permittee shall include documentation in the performance test plan, justification of the duration for system conditioning.
- b. CfPT - The permittee shall conduct dioxin/furan testing under normal operating conditions for the following parameters.
- i. Carbon monoxide (or hydrocarbon) CEMS emissions levels shall be within the range of the average value to the maximum value allowed. The average value is defined as the sum of the hourly rolling average values recorded (each minute) over the previous 12 months, divided by the number of rolling averages recorded during that time. The average value shall not include calibration data, startup data, shutdown data, malfunction data, and data obtained when not burning hazardous waste.
 - ii. Each operating limit established to maintain compliance with the dioxin/furan emission standard shall be held within the range of the average value over the previous 12 months and the maximum or minimum, as appropriate that is allowed. The average value is defined as the sum of the rolling average values recorded over the previous 12 months, divided by the number of rolling averages recorded during that time. The average value shall not include calibration data, startup data, shutdown data, malfunction data, and data obtained when not burning hazardous waste.
 - iii. Chlorine shall be fed at normal feedrates or greater.
 - iv. OEPA may approve an alternative range to that required if the permittee documents in the CfPT plan that it may be problematic to maintain the required range during the test. In addition, when making the finding of compliance, OEPA may consider test conditions outside the range specified in the test plan based on a finding that the permittee could not reasonably maintain the range specified in the test plan considering factors including whether the time duration and level of the parameter when operations were out of the specified range were such that operations during the CfPT are determined to be reasonably representative of normal operations. In addition, OEPA shall consider the proximity of the emissions test results to the standard.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart EEE]

(12) Operating conditions during subsequent testing

- a. Current OPLs are waived during subsequent CPT.

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- b. Current OPLs are waived during pretesting prior to comprehensive performance testing for an aggregate time not to exceed 720 hours of operation (renewable at the discretion of OEPA) under an approved test plan or if the source records the results of the pretesting. Pretesting means:
 - i. Operations when stack emissions testing for dioxin/furan, mercury, SVM, LVM, particulate matter, or hydrogen chloride/chlorine gas is being performed.
 - ii. Operations to reach steady-state operating conditions prior to stack emissions testing.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(13) Time extension for subsequent performance tests

After the initial CPT, the permittee may request up to a one-year extension for conducting a CPT or CfPT to consolidate performance testing with other state or federally required emission testing, or for other reasons deemed acceptable. If a time extension is granted for a CPT, the deadline for commencing the next CPT and CfPT are based on the date that the subject CPT commences.

- a. The permittee shall submit in writing any request for a time extension for conducting a performance test.
- b. The extension request shall include:
 - i. A description of the reasons for requesting the time extension.
 - ii. The date by which the performance test will commence.
- c. The permittee shall be notified in writing of approval or intention to deny approval within 30 calendar days after receipt of sufficient information to evaluate the request. The 30-day approval or denial period shall begin after the permittee has been notified in writing that the application is complete. The permittee shall be notified, in writing, whether the application contains sufficient information to make a determination within 30 calendar days after receipt of the original application and within 30 calendar days after receipt of any supplementary information that is submitted.
- d. When notifying the permittee that the application is not complete, it will be specified the information needed to complete the application. The permittee shall also be provided notice of opportunity to present, in writing, within 30 calendar days after notification of the incomplete application, additional information or arguments to enable further action on the application.
- e. Before denying any request for an extension, the permittee shall be notified, in writing, of the intention to issue the denial, together with:

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- i. Notice of the information and findings on which the intended denial is based.
 - ii. Notice of opportunity for the permittee to present in writing, within 15 calendar days after notification of the intended denial, additional information or arguments before further action on the request.
- f. The final determination to deny any request for an extension shall be in writing and shall set forth specific grounds upon which the denial is based. The final determination shall be made within 30 calendar days after the presentation of additional information or argument (if the application is incomplete), or within 30 calendar days after the final date specified for the presentation if no presentation is made.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(14) Failure of performance test

a. CPT

- i. If the permittee has determined (based on CEM recordings, results of analyses of stack samples, or results of CMS performance evaluations) that an emission standard has been exceeded during the CPT for a mode of operation, the permittee shall cease hazardous waste burning immediately under that mode of operation. The determination shall be made within 90 days following completion of the performance test.
- ii. If the permittee has failed to demonstrate compliance with the emission standards for any mode of operation:
 - (a) Prior to submitting a revised Notification of Compliance (NOC), the permittee may burn hazardous waste only for the purpose of pretesting or CPT testing under revised operating conditions, and only for a maximum 720 hours (renewable at the discretion of OEPA).
 - (b) The permittee shall conduct a CPT under revised operating conditions following the requirements for performance testing.
 - (c) The permittee shall submit a NOC subsequent to the new CPT.

b. CfPT

If the permittee determines (based on CEM recordings, results of analyses of stack samples, or results of CMS performance evaluations) that they have failed the dioxin/furan emission standard during a CfPT, the permittee shall cease burning hazardous waste immediately. This determination shall be made within 90 days following completion of the performance test. To burn hazardous waste in the future:

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- i. The permittee shall submit for review and approval a test plan to conduct a CPT to identify revised limits on the applicable dioxin/furan operating parameters.
 - ii. The permittee shall submit a NOC with the dioxin/furan emission standard. The permittee shall include in the NOC the revised limits on the applicable dioxin/furan operating parameters.
 - iii. Until the NOC is submitted, the permittee shall not burn hazardous waste except for purposes of pretesting or CfPT, and for a maximum of 720 hours (renewable at the discretion of OEPA).
- c. The permittee may obtain written approval to burn hazardous waste in the interim prior to submitting a NOC for purposes other than testing or pretesting. Operating requirements must be specified, including limits on operating parameters that will ensure compliance with the emission standards based on available information including data from the failed performance test. OEPA will review, modify as necessary, and approve if warranted the interim operating requirements. An approval of interim operating requirements will include a schedule for submitting a NOC.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

(15) Waiver of performance test

- a. The permittee is not required to conduct performance tests to document compliance with the mercury, SVM, LVM or hydrogen chloride/chlorine gas emission standards. Compliance is assumed if the 12-hour rolling average maximum theoretical emission concentration (MTEC) does not exceed the emission standard.
 - i. Determine the feedrate of mercury, SVM, LVM, or total chlorine and chloride from all feedstreams.
 - ii. Determine the stack gas flowrate.
 - iii. Calculate a MTEC for each standard assuming all mercury, SVM, LVM or total chlorine (organic and inorganic) from all feedstreams is emitted.
- b. To document compliance, the permittee shall
 - i. Monitor and record the feedrate of mercury, SVM, LVM, and total chlorine and chloride from all feedstreams.
 - ii. Monitor with a CMS and record in the operating record the gas flowrate (either directly or by monitoring a surrogate parameter that have been correlated to gas flowrate).
 - iii. Continuously calculate and record in the operating record the MTEC.

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- iv. Interlock the MTEC calculated to the AWFCO system to stop hazardous waste burning when the MTEC exceeds the emission standard.
- c. In lieu of b.iii and b.iv above, the permittee may:
 - i. Identify in the NOC a minimum gas flowrate limit and a maximum feedrate limit of mercury, SVM, LVM, and/or total chlorine and chloride from all feedstreams that ensure the MTEC is below the applicable emission standard.
 - ii. Interlock the minimum gas flowrate limit and maximum feedrate limit to the AWFCO system to stop hazardous waste burning when the gas flowrate or mercury, SVM, LVM and/or total chlorine and chloride feedrate exceeds the limits.
- d. When the permittee determines the feedrate of mercury, SVM, LVM, or total chlorine and chloride, the permittee shall assume that the analyte is present at the full detection limit when the feedstream analysis determines that the analyte is not detected in the feedstream.
- e. The permittee shall state in the site-specific test plan that it is intended to comply with the provisions. The permittee shall include in the test plan documentation that any surrogate that is proposed for gas flowrate adequately correlates with the gas flowrate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart EEE]

- (16) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart EEE, including the following sections:

63.1208(b)	Test Methods
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[Authority for term: OAC rule 3745-77-07(C)(1) and P0136093]

- g) **Miscellaneous Requirements**
 - (1) None.

2. Emissions Unit Group - Cooling towers: P007, P008, and P009

EU ID	Operations, Property and/or Equipment Description
P007	Cooling Tower (2010). The capacity for this tower is 225,000 gallons per hour and for the entire system is 450,000 gallons per hour.
P008	Cooling Tower (2011). The capacity for this tower is 225,000 gallons per hour and for the entire system is 450,000 gallons per hour.
P009	Cooling Tower (2012). The capacity for this tower is 225,000 gallons per hour and for the entire system is 450,000 gallons per hour.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	PE from this EU shall not exceed 3.3 lbs/hr and 14.6 TPY. The summation of PE from all of the cooling towers shall not exceed 29.2 TPY.* *See b)(2)b. Visible PE from this EU shall not exceed 20% opacity as a 6-minute average.
b.	OAC rule 3745-17-11(A)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to ORC 3704.03(T)
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to ORC 3704.03(T).
d.	40 CFR Part 63, Subpart Q	Exempt, see b)(2)a.

- (2) Additional Terms and Conditions
 - a. The permittee shall not use chromium-based water treatment chemicals.
 - b. The entire cooling tower system has a maximum capacity of 7,500 gallons per minute and 450,000 gallons per hour.
- c) Operational Restrictions
 - (1) The specific gravity of the water entering the cooling tower shall not exceed 1.11.
[Authority for term: OAC rule 3745-77-07(A)(1), P0107110, P0107874 and P0109231]
 - (2) The water flow rate into the EU shall not exceed 225,000 gallons per hour.
[Authority for term: OAC rule 3745-77-07(A)(1), P0107110, P0107874 and P0109231]
 - (3) The combined water flow rate into the cooling towers shall not exceed 450,000 gallons per hour.
[Authority for term: OAC rule 3745-77-07(A)(1), P0107110, P0107874 and P0109231]
 - (4) The maximum air flow through the cooling tower shall not exceed 1.26 million pounds per hour.
[Authority for term: OAC rule 3745-77-07(A)(1), P0107110, P0107874 and P0109231]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall record the specific gravity of the water in the closed-loop scrubber water system at least once per day.
[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]
 - (2) The permittee shall visually inspect the cooling tower demister system for blockage, displacement, or other deterioration that may reduce operating efficiency below the designed value. Inspections shall, at a minimum, be conducted whenever the cooling tower is out of service for more than 24 hours and/or whenever the permittee has reason to believe that the drift rate has exceeded the design parameters. Inspections shall be documented and include the date of the inspection, the name of the inspector, and shall note any deficiencies that were discovered. Corrective actions taken to address all identified deficiencies shall also be documented. If no deficiencies were discovered, a statement to that effect should be noted.
[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]
 - (3) The permittee shall operate and maintain a specific gravity monitor which measures the specific gravity of the water in the closed loop scrubber water system. The monitoring device shall be capable of accurately measuring the desired parameter. The specific gravity monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the

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permittee approved by the manufacturer. In the event the installed specific gravity monitor is inoperable, a manual specific gravity monitor may be used. The manual specific gravity monitor shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

- (4) Each time a change is made to the cooling tower equipment or equipment operation that may increase the drift rate, the permittee shall notify OEPA NEDO, immediately.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

- (5) The permittee shall operate and maintain a water flow rate monitor and recorder which measures and records the flow rate of the water entering the cooling towers. Units shall be in gallons per minute. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The flow rate 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 approved by the manufacturer.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

- (6) The permittee shall operate and maintain a means of monitoring the air flow rate through the cooling towers (e.g. monitoring the fan motor amperage and relating the amperage to the air flow through a manufacturer's fan curve). The air flow rate through the cooling towers shall be recorded at least once per month.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

e) **Reporting Requirements**

- (1) The permittee shall submit deviation (excursion) reports that identify all times the specific gravity of the cooling tower water exceeded 1.11.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

- (2) The permittee shall submit deviation (excursion) reports that identify all times the water flow rate into the cooling tower exceeded 225,000 gallons per hour.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

- (3) The permittee shall submit deviation (excursion) reports that identify all times the combined water flow rate into the cooling towers exceeded 450,000 gallons per hour.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

- (4) The permittee shall submit deviation (excursion) reports that identify all times the air flow rate through the cooling tower exceeded 1.26 million pounds per hour.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from this EU shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible PE observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

PE from this EU shall not exceed 3.3 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E = \text{TDS} \times \text{GPH} \times \text{drift} \times \text{density} \times \text{SG}$$

where:

E = PE, pounds per hour;

GPH = water flow rate, in gallons per hour;

drift = cooling tower drift, as provided by manufacturer, 0.00001;

TDS = 0.16, based on maximum expected specific gravity of scrubber water where maximum dissolved solids are expected to be sodium chloride and sodium sulfate;

density = average density of water at 60 degrees Fahrenheit, 8.33 pounds per gallon; and

SG = specific gravity as measured in the cooling tower water circulating system.

c. Emission Limitation:

PE from this EU shall not exceed 14.6 TPY.

Applicable Compliance Method:

The TPY emission limitation was developed by multiplying the short-term allowable PE limitation (3.3 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

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d. Emission Limitation:

The summation of PE from the cooling towers shall not exceed 29.2 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E = \text{TDS} \times \text{GPH} \times \text{drift} \times \text{density} \times \text{SG} \times 8760/2000$$

where:

E = PE from new cooling towers, TPY;

GPH = total water flow rate through the new cooling towers, in gallons per hour;

drift = cooling tower drift, as provided by manufacturer, 0.00001;

TDS = 0.16, based on maximum expected specific gravity of scrubber water where maximum dissolved solids are expected to be sodium chloride and sodium sulfate;

density = average density of water at 60 degrees Fahrenheit, 8.33 pounds per gallon;

SG = specific gravity as measured in the cooling tower water circulating system;

8760 = conversion factor, hours per year; and

2000 = conversion factor, pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1), P0107110, P0107874 and P0109231]

g) Miscellaneous Requirements

(1) None.