



Response to Comments

Project: Mahoning Renewable Energy, LLC
Ohio EPA Permit Number: 02-23003

Agency Contacts for this Project

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On December 19, 2008, Ohio EPA's Division of Air Pollution Control (DAPC) issued draft permit-to-install (PTI) 02-23003 to Mahoning Renewable Energy, LLC (MRE) for their proposed waste-to-energy facility to be located in Smith Township, Ohio. On January 16, 2009, DAPC re-issued the draft PTI with changes that include the addition of ambient air monitoring requirements, a more stringent annual mercury emission limit, a requirement to operate the carbon injection system at all times and a requirement to perform a carbon injection system optimization study to maximize the control of mercury emissions.

An information session and public hearing were held on February 17, 2009, and written comments on the draft PTI were accepted until February 24, 2009. The following are responses to the questions and comments received during the hearing and comment period pertinent to the proposed draft permit for the facility. Comments are paraphrased in bold print, followed by DAPC's responses.

DAPC is not able to take into consideration comments made in support of or opposition of the permit, job growth as a result of the proposed facility, economic development, noise, truck traffic or union involvement, aesthetics of the facility, among other things. These comments are not responded to in this Response to Comments. Only the comments received that DAPC is legally able to take into consideration are responded to in this document.

Public Hearing Comments

Comment 1: **Concern was raised as to the affect of this facility on recycling efforts. This concern included a discussion of stockpiling waste materials on site.**

Response 1: Non-combustible metal materials such as steel and aluminum will be recycled at a very efficient rate. These materials have value as a revenue stream for the facility and make poor Refuse-Derived Fuel.

Other recyclable materials will be removed from the waste stream in accordance with the Materials Separation Plan required by the New Source Performance Standards, 40 CFR, Part 60, Subpart Eb (Subpart Eb). This facility will not affect local recycling efforts performed on the waste stream prior to entering the facility. If anything, more recycling will take place as a result of this facility, because additional materials will be pulled from the waste stream on-site.

Waste materials are not allowed to be stockpiled outside of the building on the premises. A statement has been added to the PTI to clarify this.

Comment 2: Why such a hurry on the air permit when MRE hasn't been truly approved to bring in all the waste and build the facility itself?

Response 2: DAPC's role is to review the application submitted by the company for the air permit in a timely fashion. There are no additional air permits necessary for this facility to bring in waste or build the facility.

Additional permits will be required by other divisions at Ohio EPA. Language will be added in this permit to clarify that this air permit in no way alleviates the company from obtaining permits from other divisions prior to installing the facility.

Comment 3: If air pollution standards (change) – if they would put in a new standard that was a lower standard, would this facility then be asked to go with the new requirements or with those that are currently in the requirements?

Response 3: If air pollution standards change, the individual standard would identify whether or not sources which are already permitted would be subject to the new standards. In many cases changes of standards require the facility to meet the new standards.

For the case of standards changing as a result of the county not meeting the National Ambient Air Quality Standards and being reclassified as "non-attainment, see the response to Comment 10.

Comment 4: I know the board of health does a lot of testing for water and soil and things around landfills. Will these air pollution controls also involve our Board of Health and what will their involvement be to maintain all the criteria?

Response 4: DAPC contracts through the Mahoning-Trumbull Air Pollution Control Agency (M-TAPCA) to assist with regulatory oversight. M-TAPCA staff will have a role in inspections, stack tests and compliance investigations.

The Mahoning County Board of Health will not be directly involved with air pollution control oversight, but may be involved with Ohio EPA's Division of Solid & Infectious Waste Management to ensuring compliance with the solid waste permit.

Comment 5: Has the agency made a predetermination that the solid waste and/or surface water permits are approvable?

Response 5: Issuance of the air pollution control PTI to this facility has no bearing on whether or not other permits are approvable.

Comment 6: Why is the air pollution PTI being issued when the solid waste PTI has not been reviewed? Would it not be more prudent to review the PTI's concurrently?

Response 6: Upon receiving a complete PTI application, DAPC is required to act in a timely manner to determine if a draft permit is appropriate. The application was submitted in a timely manner and DAPC is making a good faith effort to get the permit issued within its normal time frames.

The terms and conditions set forth in the draft air permit should have little affect on the requirement of any other divisions at Ohio EPA. The permit in no way allows violations of any Ohio EPA rules or regulations.

Comment 7: If changes are made due to the solid waste PTI review, how will this effect the air permit and what is the process to change this permit since it may already be issued (modification or alteration)?

Response 7: DAPC does not foresee a situation where solid waste requirements would change requirements specified in the air pollution control PTI. However, if such a situation arose, the company would be asked to submit an application to modify (either administratively or as defined by OAC rule 3745-31-01) the PTI, generally at additional cost to the company.

Comment 8: Will the modeling submitted in the application be relevant if the facility is located or oriented in a place other than proposed in the air pollution control permit application?

Response 8: If the facility is constructed (especially the main stack) in a location different than was originally proposed, the modeling will have to be performed taking into account the new stack coordinates to ensure all modeling criteria are still met.

Comment 9: Transload America (TLA) owns property on both sides of Middletown Road in Smith Township. If MRE (the company) locates the facility on property other than proposed will they need to modify and/or alter the air PTI application.

Response 9: At times a facility will be constructed in a slightly different location than what was represented in the PTI application, but still within the same contiguous property. Generally, the only portion of the application that needs to be updated is the modeling. However, this is dealt with on a case-by-case basis and a new application can be required if DAPC feels it is warranted.

Comment 10: If U.S. EPA rules that Mahoning County is a non-attainment county prior to the PTI being issued as a final action, please indicate what requirements will be required?

Response 10: Currently Mahoning County is classified as "attainment" for all criteria pollutants which means that the ambient air is meeting the National Ambient Air Quality Standards.

For pollutants for which the facility is classified as "major", the application has undergone a Prevention of Significant Deterioration review (also known as Best Achievable Control Technology).

If Mahoning County became non-attainment for a pollutant for which the facility is classified as "major" prior to the final issuance of the permit, the application would have to undergo a Non-attainment New Source Review (also known as Lowest Achievable Emission Rate).

Comment 11: Since this is a brand new emission source, would it not be prudent and more protective of the public's health and the environment to wait for the solid waste review to catch up and then issue the air PTI based on the actual facility location and actual county attainment status?

Response 11: See the response to Comment 6. DAPC must base all decisions on what is proposed in the permit application. The company has not indicated any desire to build the facility in an alternate location. Currently Mahoning County is classified as attainment for all criteria pollutants. DAPC does not have the ability to wait to see if standards or classifications change in the future. The Division of Solid and Infectious Waste Management has been kept apprised of the processing of this permit and was given the draft terms and conditions up front.

Comment 12: If the air pollution source is not constructed prior to the PTI expiration date, what changes will be required for this PTI?

Response 12: If construction is not initiated prior to the termination deadline detailed below, the PTI will be revoked and a new application would be required. The new application would be reviewed as an entirely new project with the review standards appropriate to the new submittal time frame.

The company is required to undertake a continuing program of installation or enter into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation, within eighteen months of the effective date of the PTI. However, this deadline may be extended by up to 12 months if application is made to the director of Ohio EPA within a reasonable time before the termination date and the party shows good cause for any such extension.

Comment 13: Were the Youngstown and Canton air monitoring stations used for comparison for air quality and monitoring information for this facility?

Response 13: DAPC does not compare modeling results to specific monitors. The monitoring data is used as the background information and added to the modeling results to ensure that the facility will not cause measured National Ambient Air Quality Standard violations at the monitors. For this facility, the background monitors used were as follows:

NO_x - Cleveland, Cuyahoga County Monitor 39-035-0007
CO - Mingo Junction, Jefferson County Monitor 39-081-1001
SO₂ - Youngstown, Mahoning County Monitor 39-099-0013
PM₁₀ - Youngstown, Mahoning County Monitor 39-099-0006

For the toxic pollutants modeled, the modeled toxic concentration must be below the respective Maximum Acceptable Ground-Level Concentration (MAGLC) value, calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A".

For this facility, extensive ambient air quality monitoring will be performed before and after the facility is operated in order to provide air quality data as well.

Comment 14: If after conducting the modeling the emission source is found to impact the community, what will be required of the applicant?

Response 14: Current modeling indicates that there are no significant impacts to the community. If future changes at the facility trigger modeling and modeled violations are found we would require them to make modifications to the proposed source or control devices until the modeling thresholds are not exceeded.

Comment 15: The applicant is holding an information meeting on the “Draft Preliminary Materials Separation Plan” the night after Ohio EPA’s public information and hearing session.

Are there two separate air permits?

Response 15: The question is not completely clear. The Materials Separation Plan required by Subpart Eb is included as a requirement in the draft air PTI. Subpart Eb is a federal regulation that requires the company to hold a separate public meeting regarding the plan for the benefit of the local citizens.

Only one application for an air pollution control PTI has been received for this facility. Prior to one year of operation, the company will be required to submit an application for a Title V operating permit as well.

Comment 16: Has the Ohio EPA’s Division of Solid and Infectious Waste Management (DSIWM) concurred with the technical adequacies of the material separation plan?

Response 16: Subpart Eb is a federal air pollution control regulation. State and federal air pollution control representatives have provided comments on the draft preliminary plan which the company will address in the final preliminary plan. Standards for review of this plan are not based on DSIWM guidelines. DSIWM does not have rules requiring that recycling occurs.

Comment 17: If not (referring to Comment 16), how were the emissions levels quantified in this air permit?

Response 17: Emission limitations for air contaminants were set using the more stringent emission limitations of Subpart Eb and the emission limitations established through Best Available Control Technology (BACT) Requirements (comparing to the best controlled similar sources in the U.S.). If these requirements did not apply to a specific pollutant, Ohio’s Best Available Technology (BAT) requirements were used to establish a limit. The requirements of the material separation plan discussed in Comment 16 have no effect on the emission limitations established in the permit.

Comment 18: You indicated that the EPA sets the limits that this facility will have to meet. What happens if they do not meet these limits? I know that the EPA will be testing and if they are not in compliance that warnings will be issued and they can be fined. No disrespect to the EPA but I live a little south of Canton. The landfill in Bolivar has had many warnings and has paid hundreds of thousands of dollars in fines but they are still operating and I do not see that changing. The smell from that place is horrible. I don't live real close to it but there are still days that it smells so bad that we can not go outside. I can not image what the people that live in Bolivar have to put up with. Here is a facility that has repeatedly had violations and is still operating. If this proposed facility starts up and does not meet your requirements how long will the people in this community have to live with the results until the EPA has the authority to shut it down?

Response 18: The situation at the landfill near Canton is one of the more complex problems Ohio EPA has been involved with. A facility such as the proposed MRE is much more straight-forward. If emission limitations are exceeded as demonstrated through stack testing, continuous emissions monitoring systems or other on site monitoring, a violation of the permit terms has occurred. In any case where an emission limit has been exceeded, a Notice of Violation will be issued. Depending on the severity, further enforcement action may be taken including Findings and Orders or a Consent Order through the Attorney General's Office. Orders normally include requirements which must be met to maintain compliance as well as a monetary penalty.

If a violation occurs that results in probable impacts to the health and welfare of the community, swift action will be taken to eliminate this impact.

All solid waste received by rail will be baled and surrounded by multiple layers of low-density polyethylene (LDPE) with a thickness of 25 to 35 microns. This material has a high degree of resistance to perforation and tearing. An enclosed conveyor system will be used to transport the refuse-derived fuel (RDF) after processing. The draft air PTI requires the rail and truck tipping floor, the RDF processing area and the RDF storage building to be under negative pressure at all times. Any air leaving these areas will either be vented to the control system or used as boiler makeup air and then vented to the control system. These requirements should prevent nuisance odors at this proposed facility.

Comment 19: When the modeling was done, did it take into account businesses that are located close to the facility? There is a plant that makes food packaging material that is used worldwide that these emissions could be harmful to their process. Also there is a farm that raises chickens that are consumed by people. I do not like the thought of eating chickens that are breathing air that is not clean or that even has these types of contaminants in it. I know you said that some of these contaminants are found in automobile traffic but if you look at the area there is not much traffic and I am assuming that is why they are being raised here.

Response 19: DAPC has completed a detailed analysis of the impact of the expected emissions from the proposed facility. This analysis includes detailed computer modeling that calculated the maximum pollutant concentrations downwind of the plant. This modeling included the emissions from significant other sources of air pollution located in the area. Based on this analysis, the added air pollution as a result of the facility will not result in air pollution levels that could cause health impacts to citizens in the area. This includes sensitive industries such as the ones mentioned in this comment.

Comment 20: Did anyone look at the affects that these emissions will have on the local wildlife? This facility is located very close to Berlin Lake. There is a lot of wildlife that lives in this area. There are also a lot of wetlands in this area. I know you said that the stack is high and will disperse the emissions but what about those cloudy, rainy days that will force the emissions down to the ground very fast and they will not disperse over a large area. What effect will that have on the wildlife and the lake?

Response 20: The emission limits established through the draft PTI are protective of human health or welfare, plant or animal life or property. Local vegetation and endangered species were also taken into account in the modeling that was performed.

The modeling programs also take into account local weather patterns which could cause phenomenon like air inversions keeping pollutants closer to the ground. All modeling demonstrated that there would be not be health impacts to the community.

Comment 21: Do they have an emergency plan? I would like to see an emergency plan that outlines what they will do in case there is a failure in the filtration system, if a test they have completed is higher than permitted, etc. What do they do, whom do they notify? Some of the items that could come out of the facility could be harmful to people especially those that have breathing problems and it may be the case

that with notice those people could at least take necessary precautions. Also there are companies very close that will have a problem with some emissions. Will they be notified? What will Mahoning Renewal Energy be required to do in case there is an emergency?

Response 21: In the case of an air pollution control equipment malfunction that results in a violation or probable violation of any emission limit, the company must notify DAPC immediately pursuant to Ohio rules. Any malfunction that might result in excess emissions would result in shut down of the feed to the boiler, thereby eventually eliminating the source of emissions. The facility self-generates electricity needed to operate and the utility acts as back-up, therefore, a situation where total power to a boiler is lost, which would shut down (not bypass) all systems, is not likely.

The fabric filtration system is equipped with multiple compartments and is designed such that any of the compartments can be isolated while the filtration system continues to operate. Therefore, if a bag were to fail in a compartment, that compartment would be isolated while the system continues to function as designed. In the event of an emergency shut-down of the boiler, feed will be halted and the air pollution control system would continue to operate until all fuel on the grate is combusted. Once the feed to the boiler is halted burnout of the remaining fuel will be relatively quick requiring in the range of two to four minutes.

Residents or businesses in the area would only be notified in the case where DAPC felt there would be imminent harm to public health.

Comment 22: What will happen if asbestos is found in trash – especially construction trash? I know the construction trash will be sorted separate but how will these employees know what has asbestos and what does not. I know this will be filtered separate but I find it hard to believe that a filtering system will remove all of the asbestos. If it does, what is done with the filters that now have asbestos? How will any asbestos be handled and disposed of without contaminating the rest of the trash, land, and air?

Response 22: Regulated asbestos-containing materials are not allowed to be accepted at this facility. However, it is common for municipal waste and construction and demolition debris to contain a small amount of non-friable, unregulated asbestos materials. It is not practical to attempt to identify and sort this material. It is handled along with all other material, only inside of buildings which are operated under a vacuum. All air from inside of the buildings passes through a filter designed and approved to handle asbestos fibers. All exhaust air from the boilers also passes through approved filters. This dust may be sent to any landfill and

handled as any other non-regulated asbestos would be handled (provided there is no other constituent that would classify the dust as a hazardous waste).

Comment 23: Has the company, its owners, managers or employees ever operated an incinerator or a facility like this? If yes, what was the name of the facility and has anyone looked at the compliance and operation record? If no, how do they know how to operate such a facility? EPA is setting guidelines but if they have never operated a facility like this there will be a lot of trial and error to get it into compliance and the surrounding community will be the one to pay for penalty of bad air.

Response 23: DAPC rules and regulations do not allow the review of historical information regarding other facilities while issuing permits. However, Subpart Eb provides requirements for the chief facility operators, shift supervisors and control room operators to receive and maintain operator's certification as provided by the American Society of Mechanical Engineers or an equivalent State certification program. This regulation also requires the creation of an operating manual and associated training program which includes the following topics:

- (1) A summary of the applicable standards under this subpart;
- (2) A description of basic combustion theory applicable to a municipal waste combustor unit;
- (3) Procedures for receiving, handling and feeding municipal solid waste;
- (4) Municipal waste combustor unit startup, shutdown and malfunction procedures;
- (5) Procedures for maintaining proper combustion air supply levels;
- (6) Procedures for operating the municipal waste combustor unit within the standards established under this subpart;
- (7) Procedures for responding to periodic upset or off-specification conditions;
- (8) Procedures for minimizing particulate matter carryover;
- (9) Procedures for handling ash;

(10) Procedures for monitoring municipal waste combustor unit emissions; and

(11) Reporting and recordkeeping procedures.

Comment 24: **Are they required to have insurance or something set up to fund clean up in case there is contamination or in case they build this, can not meet the standards and have to shut it down? I did notice that Mahoning Renewable Energy was formed as an LLC which indicates that none of the owners will be responsible. If the company goes bankrupt who will be responsible to clean up the site?**

Response 24: The air program does not have rules that allow us to require insurance for potential cleanup. However, the solid waste program requires that the company have a bond, trust fund, letter of credit or similar fund to cover a cleanup of the facility should it shut down permanently. This must include the cost of a third-party to perform the closure by cleaning the facility and removing all wastes for off-site disposal.

U.S. EPA Comments

Comment 25: **Both the permit application and the draft permit staff determination say that for VOC/CO control that most add-on control technologies such as thermal or catalytic oxidizers are cost prohibitive. What is the cost (in dollar per ton of pollutant removed) for the technically feasible control technologies? Please add to the permitting record the State's rationale, which should include a detailed analysis of the technical and economic feasibility of available control technologies supporting such a conclusion.**

Response 25: A cost analysis for VOC controls has been added to the permit determination. The various controls would range in cost from between \$14,000 per ton to \$192,000 per ton. In this case the VOC content of the exhaust gas would be very low so the cost is probably closer to the upper end of the range.

Comment 26: **The permit shows that Regenerative SCR (RSCR) was chosen as the Best Available Control Technology for NOx control. Both the permit staff determination and the permit application show that SCR is capable of NOx removal efficiency between 75% - 90% while the RSCR removal efficiency is greater than 80%. If RSCR controls less NOx than SCR, please explain in greater detail why it was chosen BACT instead of SCR.**

Response 26: The descriptions of the various control technologies in the BACT analysis, Section 5 of the permit application, are descriptions of the technologies that were provided by vendors or available on the U.S. EPA Web site within the Air Pollution Training Institute's Online Course "Basic Concepts in Environmental Sciences." These descriptions provide the theoretical control efficiencies attainable by the various control devices and not the actual control efficiencies expected when applied to an RDF facility using a mixture of solid waste and construction and demolition debris as input to the process.

However, during the BACT analysis, the U.S. EPA's "BACT/RACT/LAER Clearinghouse" was reviewed, as well as other state and air quality management districts throughout the United States, to determine the lowest emission rate from similar facilities throughout the country. During the BACT review, the lowest emission rate of NO_x was 110 ppmvd at the Hillsborough County Resource Recovery facility (Hillsborough) in Tampa, Florida. This facility utilizes selective noncatalytic reduction for the control of NO_x emissions and the emission rate of 110 ppmvd represents BACT. The company has proposed a NO_x emission rate of 75 ppmvd which is significantly lower than the Hillsborough facility and exceeds the BACT requirement. The proposed emission rate makes the facility's NO_x emission rate significantly better than BACT.

Comment 27: The permit does not show how the two RDF-fired stoker boilers will start up. Will they start up using an alternate fuel such as natural gas or some other fuel? How much of that alternate start up fuel will be burned annually? If starting up on an alternate fuel, the permit should limit how much of that fuel can be burned on an annual basis, and stipulate that it is only to be used for start up.

Response 27: The start-up burners are fueled by natural gas. The burners are about 15% of the capacity of the boiler so they could not be used as a primary fuel. Burning natural gas at startup would not result in emissions above those currently in the permit for RDF firing. The RSCR with its internal low NO_x burners and heat recovery media, SCR catalyst and CO catalyst would treat the emissions from the start-up burner(s) as they would for emissions under normal operation.

Because of the relatively small size of the start-up burners and the fact that emissions from them are already covered in the emission limitations, DAPC feels it is unnecessary to include separate limits or restrictions on these burners.

However, language has been added to clarify that natural gas will be fired for purposes of startup only. Language has also been added to require

the company to record the time periods when natural gas is burned and the amount burned for each start-up event.

Comment 28: We suggest that emission units F001, F002, P901, P902, P903 and P904 (and any other emission units with a visible emission inspection requirement) contain language requiring the recording of the time of the daily (or weekly) visible emission inspection. Please note that we have made this same comment for other Ohio permits.

Response 28: This language will be modified accordingly.

Comment 29: Regarding F001/ Roadways and Parking: The permit does not specify how the frequency of the dust control sweeping and/or watering will be determined. Please have this specified in the permit.

Response 29: The permittee is required to employ best available control measures to minimize or eliminate visible emissions of fugitive dust in sections b)(1)a and b)(2)a. The best available control measures are defined in section b)(2)a. The frequency of implementing the best available control measures is determined by the permittee during inspections as required in section b)(2)b. Inspections of the roadways and parking areas are required on a daily basis in section d)(1). Finally, section d)(2) defines the purpose of the inspections and that is to determine the need for implementing the best available control measures.

Comment 30: The permit application lists emergency diesel-fired fire water pumps: Why are they not included in the permit along with emission limits resulting from a full BACT analysis?

Response 30: One of the pumps is actually going to be electric. The other is a diesel-fired water pump with a maximum of 252 horsepower. It will be handled under a separate application for permit-by-rule. This will restrict it to less than 500 hours per year (the company has indicated they will operate it 22 hours/year). This will restrict the potential to emit for the largest pollutant, NOx, to less than two tpy (actual emissions will be less than 0.09 tpy. No additional control will be required.

Comment 31: What are the estimated VOC emissions from the two RDF-fired stoker boilers and should they have VOC emission limits?

Response 31: VOC emission limitations of 14.0 lbs/hr and 61.3 tpy will be added to the permit.

General Comment Regarding Information Supplied By SANCAP Liner Technology, Inc.

Comment 32: SANCAP Liner Technology, Inc. provided a significant amount of information regarding the specifications that it must meet while making food-grade products. Generally speaking, the concern is that this new facility will interfere with their ability to provide food-grade materials due to possible contamination.

Response 32: After reviewing the information submitted, DAPC finds no reason to believe that this facility will interfere with the operations of SANCAP Liner Technology, Inc. In order for this facility to emit enough of any one air pollutant to cause a violation of FDA standards at SANCAP Liner Technology, Inc., it would have to emit the pollutant at levels far greater than are allowed under the draft PTI.

Concerns received March 17, 2009 from Jim Petuch

Comment 33: Feels there is a lack of sufficient frequency for facility inspection by regulatory agencies (i.e., M.C. Board of Health).

Response 33: Fortunately, this facility is being installed in Mahoning County, one of only four counties in Ohio where air pollution control inspections are commonly performed by not only Ohio EPA, but by a local authority as well [Mahoning-Trumbull Air Pollution Control Agency (M-TAPCA)]. Ohio EPA will be responsible for bi-annual inspections which determine compliance with all aspects of the facilities Title V permit, as is done with all other Title V facilities in Ohio. Ohio EPA and M-TAPCA will work together to periodic partial inspections and any necessary complaint investigations, as is currently done with other solid waste facilities in Mahoning County.

Comment 34: Concerned about air and other forms of pollution where little such pollution is currently emitted in Smith Township.

Response 34: The levels of air pollutants allowed to be emitted under this permit are not expected to have an impact on the health and welfare of the local community.

Comment 35: Concerned about the opacity factor where none currently exists and the negative effect on the township's residents and ability to attract future residents.

Response 35: It is assumed that this concern is directed toward the visible emission limitations, in terms of opacity, that are applicable to this facility. Very minor amounts of visible emissions are allowed under the permit and far less are expected. These levels of visible emissions should not negatively impact the local community.

Comment 36: Concerned about the potential for generation of odors from the facility.

Response 36: Municipal waste entering the facility will be free of excess liquid and bailed in plastic wrap. The bails will not be opened until fully inside of a building. All the air vented from each building where waste handling occurs will be passed through odor control devices prior to entering the outside air. Ohio EPA and M-TAPCA will perform odor surveillance to ensure that these odor control practices are effective.

Comment 37: Concerned about the potential for noise, dust and the deterioration of roads in reference to solid waste being transported to facility.

Response 37: DAPC has no regulations related to noise issues or deterioration of public roadways. The amount of increased truck traffic on area roadways from this facility should be minimal as most waste received will arrive by rail. The facility is not allowed to track soil or debris onto public roadways. This should not be a problem since all facility roadways will be paved.

Comment 38: Concerned about the lack of sufficient recyclable material separation from the volume of solid waste destined for incineration.

Response 38: The amount of materials recycled from the waste stream prior to it entering the facility will be no different than the amount currently recycled before the material reaches a landfill. However, additional recyclable materials will be pulled from the waste stream after it enters the facility.

Comment 39: Concerned about the lack of research available on a duplicate facility.

Response 39: Although there are no facilities in the U.S. which are identical to this facility, there are many similar facilities. All other similar facilities were researched to ensure that each emission limit given to this facility was as stringent or more stringent than the best controlled facility.

Comment 40: Concerned about the potential consequences of emissions of particulate matter, lead, sulfur dioxide, hydrochloric acid, dioxin/furan, nitrogen oxides, carbon monoxide, sulfuric acid, cadmium, mercury, hydrogen fluoride and ammonia.

Response 40: See Responses 19 and 20.

Comment 41: **Concerned about attainment versus non-attainment air quality standards and the apparent rush to get approval prior to the U.S. EPA imposing more stringent standards.**

Response 41: See Responses 6 and 10.

Comment 42: **Concerned about what happens to facility if the project fails – left with smoke stacks and an empty eyesore for the community to handle.**

Response 42: DAPC has no regulations regarding aesthetics; however, see Response 24 for information on cleanup of a shutdown facility.

End of Response to Comments