

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N543273254

FACILITY: Southeast Berrien County Landfill Authority		SRN / ID: N5432
LOCATION: 3200 Chamberlain Rd., BUCHANAN		DISTRICT: Kalamazoo
CITY: BUCHANAN		COUNTY: BERRIEN
CONTACT:		ACTIVITY DATE: 08/08/2024
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection for FCE		
RESOLVED COMPLAINTS:		

On August 8, 2024, AQD staff traveled to Berrien County to perform an inspection of the Southeast Berrien County Landfill (SEBCL). SEBCL is a licensed Type II Municipal Solid Waste (MSW) landfill. The purpose of the inspection was to determine the facility's compliance with MI-ROP-N5432-2022 and applicable state and federal air pollution control regulations 40 CFR Part 62 Subpart OOO, National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subparts A and AAAA, NESHAP for Asbestos 40 CFR Part 61 Subparts A and M.

SEBCL is in a signed agreement to lease a portion of their property to North American Natural Resources (NANR) for the construction of a landfill gas to energy facility. NANR was issued a permit (PTI No. 296-08) for four stationary 3520 Caterpillar reciprocating internal combustion engines (RICE) and this facility has been incorporated as Section 2 in the SEBCL ROP. Only 3 of the 4 engines are installed. These engines are subject to 40 CFR Part 60 Subpart JJJJ. The facility is also subject to 40 CFR Part 63 Subpart ZZZZ.

AQD staff arrived on site at 10:20 a.m. to sunny conditions with a temperature of 74° F, and a N wind of 2 mph. There were no noticeable odors upon arrival. AQD staff met with Justin Boone (Supervisor of Operations) who answered all questions and escorted staff around the site. The following discusses the results of the on-site inspection and review of records for Section 2 of the ROP:

On arrival, staff noted that the facility was currently changing out an existing engine (Engine2) with an identical engine. The engines were all shutdown at time of inspection and the flare was in operation. As mentioned prior, only three of the four Caterpillar 3520 internal combustion engines were installed under the original air permit. Staff noted that 2 of three are the same engines as listed in prior inspections but EUENGINE2 was currently being switched out. Engine1 has a serial number of GZJ00391, Engine 2 is being switched out from GZJ00392 to GZJ00714, Engine 3 has a serial number of GZJ00393. Current Engine hours are as follows: Engine 1: 107,869, Engine 2 (old): 99117 (new): 23674, Engine 3: 103,158. The 3516 Engine that had been stored at the facility prior has ben moved off site permanently.

The electrical output of the engines is averaging around 2.9MW for two engines at a capacity of 3.2MW when operating at almost full load. Each engine is rated at 1.6 MW or 1600 KW with each being set to operate at approximately 1545 KW. Staff then asked about vacuum on the hill and landfill gas flow to the plant. Justin said that they currently have 28" of vacuum (averaging 30") with a current flow of around 1000 scfm. The methane (CH₄) quality of the landfill gas has been ranging around 54% and O₂ around 0.5%.

Source-Wide Conditions:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
SO2	144 tpy (based on Flare max capacity and 1500 ppm Sulfur) Low of 45.2 tpy (November 2023) High of 60.4 tpy (May of 2024)	12-month rolling time period as determined at the end of each calendar month	Source-Wide
CO	212 tpy (based on RICE mas capacity) Actual: Low of 150 tpy (November 2023) High of 160 tpy (May of 2024)	12-month rolling time period as determined at the end of each calendar month	Source-Wide

All records are being kept in a satisfactory manner. Facility appears to be in compliance.

All reports are reviewed upon receipt. Records were received in a timely manner and appear to be in compliance.

FGENGINES:

Pollutant	Limit	Time Period/Operating Scenario	Equipment

NOx	3.0 pph (limit applies to each engine)	Hourly	EUENGINE1, EUENGINE2, EUENGINE3
CO	16.3 pph (limit applies to each engine)	Hourly	EUENGINE1, EUENGINE2, EUENGINE3
CO	212.0 tpy (total for the flexible group) Actual: 149.64 tpy	12-month rolling time period as determined at the end of each calendar month	FGENGINES
SO2	9.05 pph (limit applies to each engine)	Hourly	EUENGINE1, EUENGINE2, EUENGINE3
SO2	119.0 tpy (total for the flexible group) Actual: 39.6 tpy	12-month rolling time period as determined at the end of each calendar month	FGENGINES
VOC (includes formaldehyde)	92.0 tpy (total for the flexible group) Actual: 27.87 tpy	12-month rolling time period as determined at the end of each calendar month	FGENGINES
Formaldehyde	2.08 pph (limit applies to each engine)	Hourly	EUENGINE1, EUENGINE2, EUENGINE3

***pph limits based on stack test results. Facility appears to be in compliance.**

Facility only burns treated landfill gas.

Facility has current MAP.

All records are being kept and maintained in a satisfactory manner.

All reports are reviewed upon receipt. Facility appears to be in compliance.

All stacks associated with FGEngines appear to be in compliance with all requirements of the ROP.

FGRICENSPS:

Description: Non-emergency engine(s) greater than 500 hp, fueled with landfill gas. Engine ordered after June 12, 2006, and manufactured on or after July 1, 2007.

Pollution Control Device: Air-to-fuel ratio controller on each engine.

Pollutant	Limit	Time Period/ Operating Scenario	Equipment
NOx	3.0 g/hp-hr ² OR 220 ppmvd at 15% O ₂	Hourly	Each engine in FGRICENSPS
CO	5.0 g/hp-hr ² OR 610 ppmvd at 15% O ₂	Hourly	Each engine in FGRICENSPS
VOC	1.0 g/hp-hr ² OR 80 ppmvd at 15% O ₂	Hourly	Each engine in FGRICENSPS

Facility appears to be in compliance.

Maintenance plans for each engine are being kept in a satisfactory manner.

Non resettable hour meters are installed on each engine.

All required records are being kept in an acceptable manner.

All reports are reviewed upon receipt and received in a timely manner.

FGRICEMACT:

DESCRIPTION: New, existing, and reconstructed non-emergency engines greater than 500 hp fueled with landfill/digester gas, located at a major source of HAPs. Construction or reconstruction commenced on or after December 19, 2002.

Emission Units: EUENGINE1, EUENGINE2, EUENGINE3

POLLUTION CONTROL EQUIPMENT: Air-to-fuel ratio controller on each engine.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each engine in FGRICEMACT shall operate in a manner which reasonably minimizes HAP emissions.2 (40 CFR 63.6625(c))
2. Each engine in FGRICEMACT shall operate in a manner which minimizes time spent at idle during startup and minimize the startup time to a period needed for appropriate and safe loading of each engine, not to exceed 30 minutes.2 (40 CFR 63.6625(h))

Facility appears to be in compliance.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. FGRICEMACT shall equip and maintain a fuel meter to monitor and record the daily fuel usage and volumetric flow rate of the landfill gas used.2 (40 CFR 63.6625(c))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The engines in FGRICEMACT, which fire landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, must monitor and record the daily fuel usage with separate fuel meters to measure the volumetric flow rate of each fuel.2 (40 CFR 63.6625(c))

Facility appears to be in compliance.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee shall submit an annual report for FGRICEMACT in accordance with Table 7 of 40 CFR Part 63, Subpart ZZZZ to the appropriate AQD district office by no later than January 31. The following information shall be included in this annual report:2 (40 CFR 63.6650(g))

- a. The fuel flow rate and the heating values that were used in the permittee's calculations. Also, the permittee must demonstrate that the percentage of heat input provided by landfill gas or digester gas is equivalent to 10 percent or more of the total fuel consumption on an annual basis. (40 CFR 63.6650(g)(1))
- b. The operating limits provided in the permittee's federally enforceable permit, and any deviations from these limits. (40 CFR 63.6650(g)(2))
- c. Any problems or errors suspected from the fuel flow rate meters. (40 CFR 63.6650(g)(3), 40 CFR 63.6650(g), 40 CFR 63.6650(b)(5))

All reports are reviewed upon receipt. Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, as they apply to each engine in FGRICEMACT.2 (40 CFR Part 63, Subparts A and ZZZZ)

FGTREATMENTSYS-OOO

DESCRIPTION: A treatment system that filters, de-waters, and compresses landfill gas for subsequent sale or beneficial use. This flexible group contains 40 CFR Part 62, Subpart OOO requirements.

Emission Unit: EUTREATMENTSYS

POLLUTION CONTROL EQUIPMENT: Any emissions from any atmospheric vents or stacks associated with the treatment system subject to 40 CFR 62.16714(c)(1) or (2).

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must operate the treatment system so that any emissions from any atmospheric vents or stacks associated with the treatment system must comply with 40 CFR 62.16714(c)(1) or (2). (40 CFR 62.16714(c)(3) and (4))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Each permittee that chooses to comply with the provisions in 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961, as allowed in 40 CFR 62.16716, 40 CFR 62.16720, and 40 CFR 62.16722, must keep records of the date upon which the permittee started complying with the provisions in 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961 and must keep records according to 40 CFR 63.1983(e)(1) through (5). (40 CFR 62.16726(e))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. If complying with the operational provisions of 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961, as allowed in 40 CFR 62.16716, 40 CFR 62.16720, and 40 CFR 62.16722, the permittee must follow the semi-annual reporting requirements in 40 CFR 63.1981(h) in lieu of 40 CFR 62.16724(h). (40 CFR 62.16724(h))

5. The permittee must submit reports electronically according to the following:

a. Within 60 days after the date of completing each performance test (as defined in 40 CFR 60.8), the permittee must submit the results of each performance test. For data collected using test methods supported by the USEPA's Electronic Reporting Tool (ERT) as listed on the USEPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>), submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI can be accessed through the USEPA's CDX (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the USEPA's ERT or an alternative file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website, once the XML schema is available. (40 CFR 62.16724(j)(1)(i))

b. For data collected using test methods that are not supported by the USEPA's ERT as listed on the USEPA's ERT website at the time of the test, submit the results of the performance test to the USEPA at the appropriate address listed in 40 CFR 60.4. (40 CFR 62.16724(j)(1)(ii))

c. Each permittee must submit reports to the USEPA via CEDRI (CEDRI can be accessed through the USEPA's CDX). The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format

consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. (40 CFR 62.16724(j)(2))

6. The permittee shall submit any performance test reports and all other reports required by 40 CFR Part 62, Subpart OOO to the appropriate AQD District Office, in a format approved by the AQD District Supervisor. (R 336.1213(3)(c), R 336.2001(5))

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee must comply with all applicable provisions of the Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014 as specified in 40 CFR Part 62, Subpart OOO. Each permittee must comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961), for an MSW landfill with a gas collection and control system used to comply with the provisions of 40 CFR 62.16714 (b) and (c). Once the permittee begins to comply with the provisions of 40 CFR 63.1958, 40 CFR 63.1960 and 40 CFR 63.1961, the permittee must continue to operate the collection and control device according to those provisions and cannot return to the provisions of 40 CFR 62.16716, 40 CFR 62.16720 and 40 CFR 62.16722. (40 CFR 62.16716, 40 CFR 62.16720, 40 CFR 62.16722, 40 CFR Part 62, Subpart OOO)

Facility appears to be in compliance with all applicable conditions for FGTREATMENTSYS-OOO. All reports are reviewed upon receipt and were received in a timely manner.

FGTREATMENTSYS-AAAA:

DESCRIPTION: A treatment system that filters, de-waters, and compresses landfill gas for subsequent sale or beneficial use. This flexible group contains 40 CFR Part 63, Subpart AAAA requirements.

Emission Unit: EUTREATMENTSYS

POLLUTION CONTROL EQUIPMENT: Any emissions from any atmospheric vents or stacks associated with the treatment system subject to 40 CFR 63.1959(b)(2)(iii)(A) or (B).

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must operate the treatment system at all times when the collected gas is routed to the treatment system. (40 CFR 63.1958(f))

2. The permittee must operate the treatment system so that any emissions from any atmospheric vents or stacks associated with the treatment system must comply with 40 CFR 63.1959(b)(2)(iii)(A) or (B). (40 CFR 63.1959(b)(2)(iii)(C) and (D))

3. The permittee must develop a site-specific treatment system monitoring plan as required in 40 CFR 63.1983(b)(5)(ii). The plan must at a minimum contain the following: (40 CFR 63.1961(g))

a. Monitoring of filtration, de-watering, and compression parameters that ensure the treatment system is operating properly for each intended end use of the treated landfill gas. (40 CFR 63.1983(b)(5)(ii)(A))

b. Monitoring methods, frequencies, and operating ranges for each monitored operating parameter based on manufacturer's recommendations or engineering analysis for each intended end use of the treated landfill gas. (40 CFR 63.1983(b)(5)(ii)(B))

c. Documentation of the monitoring methods and ranges, along with justification for their use. (40 CFR 63.1983(b)(5)(ii)(C))

d. List of responsible staff (by job title) for data collection. (40 CFR 63.1983(b)(5)(ii)(D))

e. Processes and methods used to collect the necessary data. (40 CFR 63.1983(b)(5)(ii)(E))

f. Description of the procedures and methods that are used for quality assurance, maintenance, and repair of all continuous monitoring systems (CMS). (40 CFR 63.1983(b)(5)(ii)(F))

4. The monitoring requirements apply at all times the treatment system is operating except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities. The permittee must complete monitoring system repairs in

response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable. (40 CFR 63.1961(h))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee must install and properly operate a treatment system in accordance with 40 CFR 63.1981(d)(2). (40 CFR 63.1961(d))

2. The permittee must install, calibrate, and maintain a gas flow rate measuring device that records the flow to the treatment system at least every 15 minutes; and

secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. (40 CFR 63.1961(g))

V. TESTING/SAMPLING

Records must be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records must be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee must keep monthly records of all treatment system operating parameters specified to be monitored according to 40 CFR 63.1961. The records must include:

- a. Continuous records of the indication of flow and gas flow rate to the treatment system. (40 CFR 63.1983(c)(2))
- b. The indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines. (40 CFR 63.1983(c)(2))
- c. Maintenance and repair of the monitoring system. (40 CFR 63.1961(h))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report must be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report must be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. The permittee must submit to the appropriate AQD District Office semiannual reports for the landfill gas treatment system. The reports must be received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. The reports must include the following:

- a. The number of times the parameters for the treatment system under 40 CFR 63.1961(g) were exceeded. (40 CFR 63.1981(h)(1)(iii))
- b. Description and duration of all periods when the gas stream is diverted from the treatment system through a bypass line or the indication of bypass flow. (40 CFR 63.1981(h)(2))
- c. Description and duration of all periods when the treatment system was not operating and length of time the treatment system was not operating. (40 CFR 63.1981(h)(3))

5. The permittee must submit reports electronically according to the following:

a. Within 60 days after the date of completing each performance test required, submit the results of the performance test with data collected using test methods supported by the USEPA's Electronic Reporting Tool (ERT) as listed on the USEPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>). Submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the USEPA's CDX (<https://cdx.epa.gov/>). The data must be submitted in a file format generated through the use of the USEPA's ERT. Alternatively, submit an electronic file consistent with the extensible markup language (XML) schema listed on the USEPA's ERT website. (40 CFR 63.1981(l)(1)(i))

b. For data collected using test methods that are not supported by the USEPA's ERT as listed on the USEPA's ERT website, the results of the performance test must be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the USEPA's ERT website. Submit the ERT generated package or alternative file to the USEPA via CEDRI. (40 CFR 63.1981(l)(1)(ii))

c. Each permittee must submit reports to the USEPA via CEDRI. CEDRI can be accessed through the USEPA's CDX. The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). Once the spreadsheet template upload/forms for the reports have been available in CEDRI for 90 days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. The semiannual reports should be electronically reported as a spreadsheet template upload/form to CEDRI. If the reporting forms specific to this subpart are not available in CEDRI at the time that the reports are due, the permittee must submit the reports to the USEPA at the appropriate address listed in 40 CFR 63.13. (40 CFR 63.1981(l)(2))

6. The permittee shall submit any performance test reports and all other reports required by 40 CFR Part 63, Subpart AAAA to the appropriate AQD District Office, in a format approved by the AQD District Supervisor. (R 336.1213(3)(c), R 336.2001(5))

See Appendix 8-2

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee must comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as specified in 40 CFR Part 63, Subparts A and AAAA. (40 CFR Part 63, Subparts A and AAAA)

2. The permittee shall have implemented a written Preventative Maintenance Plan (PMP) for EUTREATMENTSYS. At a minimum, the plan shall include a schedule of maintenance activities consistent with manufacturer's recommendations, and the

operating variables that will be monitored to detect a malfunction or failure. A copy of the PMP shall be maintained on site and available upon request. If the plan is revised, it shall be submitted to the AQD District Supervisor for review and approval. (R 336.1213(3), R 336.1911)

Facility appears to be in compliance with all applicable conditions for FGTREATMENTSYS-AAAA. All reports are reviewed upon receipt and were received in a timely manner.

Facility appears to be in compliance with Section 2 of the ROP.

Upon completion of records review and on-site inspection for Section 2 of the ROP, AQD staff then went to meet with Bill Housand (Environmental Compliance Manager) at the SEBCL office to discuss Section 1 of the ROP. The following discusses the results of the on-site inspection and review of records for Section 1:

According to Bill, SEBCL takes in approximately 800 tons of waste per day on average. The landfill still operates Monday through Friday from 7 a.m. to 5 p.m. and works one Saturday per month from 8:00 a.m. to 12:00 p.m. during the months of June-September. The landfill also includes a Recycling Center next door to the landfill office that is intended to be used by residents of area municipalities. AQD staff discussed any recent odor complaints as one had been received by AQD staff the previous day to the inspection (no odors were noticed by AQD staff). Bill stated that they had not received any complaints. Staff then asked Bill regarding any scheduled GCCS work for this year and Bill stated that they were tracking changes to come in the spring. Bill states that they are not currently recirculating leachate. It was sated that all leachate still goes to the POTW whether by truck or their sewer discharge. Bill noted that the Sequencing Batch Reactor (SBR) is working well, and they treat up to 115,000 gal/day.

Source-Wide

Pollutant	Limit	Time Period/Operating Scenario	Equipment
SO ₂	144.0 tpy (based on Flare max capacity and 1500 ppm Sulfur)	12-month rolling time period as determined at the end of each calendar month	Source-Wide
CO	212.0 tpy (based on RICE mas capacity)	12-month rolling time period as	Source-Wide

		determined at the end of each calendar month	
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These limits are the same as listed in Section 2 of the inspection. The facility appears to be in compliance.

EUOPENFLARE

DESCRIPTION: One landfill gas open utility flare with a rated design capacity of 2,200 scfm, used to control excess landfill gas or when the landfill gas to energy plant is down.

Flexible Group ID: FGLANDFILL-OOO, FGLANDFILL-AAAA, FGOPENFLARE-OOO, FGOPENFLARE-AAAA

POLLUTION CONTROL EQUIPMENT: NA

Emission Limit:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
SO ₂	33.4 pph	Hourly	EUOPENFLARE
SO ₂	144.0 tpy Actual: 5.96 tpy	12-month rolling time period as determined at the end of each calendar month	EUOPENFLARE
CO	0.37 lb/MMBTU	Hourly	EUOPENFLARE
CO	113.0 tpy Actual: 8.03 tpy	12-month rolling time period as determined at the end of each calendar month	EUOPENFLARE

Facility appears to be in compliance.

PROCESS/OPERATIONAL RESTRICTION(S)

1. No later than 60 days after issuance of EUOPENFLARE, the permittee shall submit to the AQD District Supervisor, for review and approval, a preventative maintenance / malfunction abatement plan (PM / MAP) for EUOPENFLARE. After approval of the PM / MAP by the AQD District Supervisor, the permittee shall not operate EUOPENFLARE unless the PM / MAP, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum the plan shall include:

- a. Identification of the equipment and, if applicable, air-cleaning device, and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
- b. Description of the items or conditions to be inspected and frequency of the inspections or repairs.
- c. Identification of the equipment and, if applicable, air-cleaning device, operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of these parameters and a description of the method of monitoring or surveillance procedures.
- d. Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
- e. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the PM / MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the PM / MAP within 45 days after such an event occurs. The permittee shall also amend the PM / MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the PM / MAP and any amendments to the PM / MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the PM / MAP or amended PM / MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1910, R 336.1911, R 336.1912)

2. The permittee shall operate EUOPENFLARE at all times when the collected gas is routed to it.² (R336.1201(3))

3. The permittee shall operate EUOPENFLARE with no visible emissions, as determined by the methods specified in 40 CFR 60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.² (40 CFR 60.18(c)(1))

4. The permittee shall operate EUOPENFLARE with a pilot flame present at all times, as determined by the methods specified in 40 CFR 60.18(f).² (40 CFR 60.18(c)(2))

5. Non-assisted flares shall be designed for and operated with an exit velocity, as determined by the methods specified in 40 CFR 60.18(f)(4), less than 18.3 m/sec (60 ft/sec), except as provided in 40 CFR 60.18(c)(4)(ii) and (iii).² (40 CFR 60.18(c)(4)(i))

a. Non-assisted flares designed for and operated with an exit velocity, equal to or greater than 18.3 m/sec (60 ft/sec) but less than 122 m/sec (400 ft/sec) are allowed if the net heating value of the gas being combusted is greater than 37.3 MJ/scm (1,000 BTU/scf). (40 CFR 60.18(c)(4)(ii))

b. Non-assisted flares designed for and operated with an exit velocity, as determined by the methods specified in 40 CFR 60.18(f)(4) less than the velocity, V_{max} , as determined by the method specified in 40 CFR 60.18(f)(5), and less than 122 m/sec (400 ft/sec) are allowed. (40 CFR 60.18(c)(4)(iii))

7. The permittee shall install, calibrate, maintain, and operate, according to the manufacturer's specifications, a heat sensing device for EUOPENFLARE, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame for EUOPENFLARE.2 (R 336.1201(3))

8. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications, a landfill gas flow rate measuring device for EUOPENFLARE to record the flow to or bypass of the flare at least every 15 minutes.2 (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702)

Facility appears to be in compliance with al Process/Operational Restrictions.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The nameplate capacity of EUOPENFLARE shall not exceed 2,200 scfm, as specified by the equipment manufacturer.2 (R 336.1205(1)(a) & (3), R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))

Facility appears to be in compliance.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years (R 336.1213(3)(b)(ii))

1. The permittee shall verify the net heating value of the combusted landfill gas, for EUOPENFLARE. The net heating value of the combusted landfill gas determined in 40 CFR 60.18(f)(3) is calculated from the concentration of methane in the landfill gas as measured by Method 3C and the calculation in Appendix 7-1. A minimum of three 30-minute Method 3C samples are determined. The measurement of other organic components, hydrogen, and carbon monoxide is not applicable. After initial compliance, the permittee may use an alternative method and frequency for determining the net heating value, as approved by the AQD Supervisor and described in Appendix 7-1.2 (R 336.1205(1)(a) & (3))

2. The permittee shall evaluate visible emissions from EUOPENFLARE, as required by federal Standards of Performance for New Stationary Sources, at owner's expense, in accordance 40 CFR Part 60, Subpart A . Visible emission observation procedures must have prior approval by the AQD. After initial compliance, the permittee may use an alternative method and frequency for determining the visible emissions, as approved by the AQD Supervisor.2 (40 CFR 60.18(f)(1))

3. Within 45 days of permit issuance, the permittee shall verify the hydrogen sulfide (H_2S) or total reduced sulfur (TRS) content of the landfill gas burned in EUOPENFLARE weekly by gas sampling (e.g. Draeger Tubes, Tedlar Sampling Bags,

etc.) and semi-annually by gas sampling using an EPA approved method and laboratory analysis, at the owner's expense, in accordance with Department requirements. If at any time, the H₂S (TRS equivalent) concentration of the landfill gas sample exceeds 1500 ppmv, the permittee shall sample and record the H₂S (TRS equivalent) concentration of the landfill gas daily and shall review all operating and maintenance activities for the landfill gas collection and treatment system along with keeping records of corrective actions taken. Once the H₂S (TRS equivalent) concentration of the landfill gas (determined from 5 consecutive daily samples) is maintained below 1500 ppmv the permittee may resume monthly/weekly monitoring and recordkeeping. The permittee may use H₂S (TRS equivalent) testing conducted at the gas to energy plant to comply with the above testing requirement when the flare is down but the plant is operating.

No less than 30 days prior to the initial test for each type of gas sampling, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to the first test for each type of gas sampling. Thereafter, the permittee shall submit a test plan upon the request of the AQD District Supervisor or if any changes are made to the approved testing protocol. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(3), R 336.1225, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (c) & (d))

Facility appears to be in compliance with all testing/sampling requirements as determined by latest stack test in January of 2023.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years (R 336.1213(3)(b)(ii))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))

2. The permittee shall continuously monitor and record the gas flow rate for EUOPENFLARE. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) & (d))

3. The permittee shall maintain a record the following information for EUOPENFLARE:

a. The maximum annual expected landfill gas generation flow rate.² (R 336.1201(3))

b. All visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations made during the performance test as specified in 40 CFR 60.18, continuous

records of the flare pilot flame or flare flame monitoring, and records of all periods of operations during which the pilot flame of the flare flame is absent.² (R 336.1201(3))

The permittee shall keep all records on file at the facility and make them available to the Department upon request.2 (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) & (d))

4. The permittee shall keep, in a satisfactory manner, all records related to, or as required by, the PM / MAP for EUOPENFLARE.2 (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, R 336.1912, 40 CFR 52.21(c) & (d))

5. The permittee shall keep, in a satisfactory manner, records of gas sampling and analysis for H₂S or TRS concentration in the landfill gas routed to EUOPENFLARE. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d))

6. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total SO₂ mass emissions for EUOPENFLARE. Calculations shall be performed according to Appendix 7-1. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))

7. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling CO mass emissions for EUOPENFLARE. Calculations shall be performed according to Appendix 7-1. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))

8. The permittee shall keep, in a satisfactory manner, records of the monthly hours of operation for EUOPENFLARE. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1205(1)(a) & (3), R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))

9. The following records for the flare shall be maintained onsite:

a. Records indicating presence of flare pilot flame (40 CFR 60.18(f)(2))

b. The net heating value of the gas being combusted in the flare shall be calculated and recorded using the equation provided in Appendix 7-1. (40 CFR 60.18(f)(3))

c. The actual exit velocity of the flare shall be calculated and recorded by dividing the volumetric flow rate (in units of standard temperature and pressure), as determined by Federal Reference Test Methods 2, 2A, 2C, or 2D as appropriate, by the unobstructed (free) cross sectional area of the flare tip. (40 CFR 60.18(f)(4))

d. The maximum permitted velocity, V_{max} , for flares complying with 40 CFR 60.18(c) (4)(iii) shall be calculated and recorded using the equation provided in Appendix 7-1. (40 CFR 60.18(f)(5))

e. The maximum permitted velocity, V_{max} , for air-assisted flares shall be calculated and recorded using the equation provided in Appendix 7-1. (40 CFR 60.18(f)(6))

Facility appears to be in compliance with all Monitoring/Recordkeeping requirements. Records are being kept in a satisfactory manner.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be postmarked or received by appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be postmarked or received by appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

All reports are reviewed upon receipt. Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID Maximum Exhaust Diameter / Dimensions (inches) Minimum Height Above Ground (feet) Underlying Applicable Requirements

1. SVOPENFLARE 12.02 23.332 R 336.1225, 40 CFR 52.21(c) & (d)

Facility appears to be in compliance with stack/vent restrictions.

EUGENERATOR2

DESCRIPTION: One Propane Fired 22 KW Generac Emergency Generator at Scale House.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

Emission Limits:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
NOx + HC	Less than or equal to 10g/hp-hr	Life of equipment	EUGENERATOR2
CO	Less than or equal to 387 g/hp-hr	Life of equipment	EUGENERATOR2

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. There is no time limit on the use of EUGENERATOR2 during emergency situations. (40 CFR 60.4243(d)(1))
2. The permittee shall not operate EUGENERATOR2 for more than 100 hours per year for purposes of maintenance checks and readiness testing or for emergency demand response as allowed in the 40 CFR 60.4243(d). (40 CFR 60.4243(d)(2))
3. EUGENERATOR2 may be operated for up to 50 hours per calendar year in non-emergency situations as described in 40 CFR 60.4243(d)(3). These hours will count against the 100 hours per year for the purposes of maintenance checks and readiness testing or for emergency demand response provided in 40 CFR 60.4243(d)(2) except as provided in 40 CFR 60.4243(d)(3)(i). (40 CFR 60.4243(d)(3))
4. EUGENERATOR2 may operate up to 100 hours per year on propane as an alternative fuel solely during emergency operations. (40 CFR 60.4243(e))

Facility appears to be in compliance.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip EUGENERATOR2 with a non-resettable hour meter. (40 CFR 60.4237(c)) Hour meter reading is at 53.2
2. The permittee shall operate and maintain EUGENERATOR2 according to manufacturer's written instructions. (40 CFR 60.4243(a)(1))

Facility appears to be in compliance.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Performance testing is not required on EUGENERATOR2 as long as the permittee keeps a copy of the manufacturer's certification on file that documents the engine complies with the emission limits. (40 CFR 60.4245(a)(3))
2. If EUGENERATOR2 is ever fueled by propane for more than 100 hours per year and it is not certified to the emission standards while using propane, the permittee is required to conduct a performance test to demonstrate compliance with the emissions standards in 40 CFR 60.4233. (40 CFR 60.4243(e))

Facility appears to be in compliance.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall record the hours of operation of EUGENERATOR2 for each time it operates along with what classified the event as an emergency and how many hours are spent for non-emergency operation. (40 CFR 60.4245(b))
2. The permittee shall maintain records of all maintenance conducted on EUGENERATOR2. (40 CFR 60.4243(a)(1))

3. If EUGENERATOR2 is ever fueled by propane, the permittee shall record all hours of such use. (40 CFR 60.4243(e))

Records are being kept in a satisfactory manner. Facility appears to be in compliance.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

All reports are reviewed upon receipt. Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart JJJJ, as they apply to EUGENERATOR2. (40 CFR Part 63, Subparts A and JJJJ)

EUASBESTOS

DESCRIPTION: Any active or inactive asbestos disposal site (disposal ceased on 9-25-00).

Flexible Group ID: FGLANDFILL-OOO, FGLANDFILL-AAAA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. If the landfill accepts asbestos-containing waste materials from a source covered under 40 CFR 61.149, 40 CFR 61.150, or 40 CFR 61.155, the permittee shall meet the following operational requirements: (40 CFR 61.154)

a. Either there must be no visible emissions to the outside air from any active waste disposal site where asbestos-containing waste material has been deposited, or the requirements of 40 CFR 61.154(c) or (d) must be met. (40 CFR 61.154(a))

b. Unless a natural barrier adequately deters access by the general public, either warning signs and fencing must be installed and maintained as follows, or the requirements of 40 CFR 61.154(c)(1) must be met. (40 CFR 61.154(b))

i. Warning signs must be displayed at all entrances and at intervals of 100 m (330 ft) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material is deposited. (40 CFR 61.154(b)(1))

The warning signs must:

(1) Be posted in such a manner and location that a person can easily read the legend. (40 CFR 61.154(b)(1)(i))

(2) Conform to the requirements of 51 cm by 36 cm (20 inches by 14 inches) upright format signs specified in 29 CFR 1910.145(d)(4) and 40 CFR 61.154(b)(1). (40 CFR 61.154(b)(1)(ii))

(3) The permittee shall display the legend in the lower panel with letter sizes and styles of a visibility at least equal to those specified in 40 CFR 61.154(b)(1). Spacing between any two lines must be at least equal to the height of the upper of the two lines. (40 CFR 61.154(b)(1)(iii))

ii. The perimeter of the disposal site must be fenced in a manner adequate to deter access by the general public. (40 CFR 61.154(b)(2))

iii. Upon request and supply of appropriate information, the appropriate AQD District Supervisor will determine whether a fence or a natural barrier adequately deters access by the general public.

(40 CFR 61.154(b)(3))

c. Rather than meet the no visible emission requirement of 40 CFR 61.154(a), at the end of each operating day, or at least once every 24-hour period while the site is in continuous operation, the asbestos-containing waste

material that has been deposited at the site during the operating day or previous 24-hour period shall: (40 CFR 61.154(c))

i. Be covered with at least 15 centimeters (6 inches) of compacted non-asbestos-containing material. (40 CFR 61.154(c)(1)) or

ii. Be covered with a resinous or petroleum-based dust suppression agent that effectively binds dust and controls wind erosion. Such an agent shall be used in the manner and frequency recommended for the particular dust by the dust suppression agent manufacturer to achieve and maintain dust control. Other equally effective dust suppression agents may be used upon prior approval by the appropriate AQD District Supervisor. For purposes of 40 CFR 61.154(c)(2), any used, spent, or other waste oil is not considered a dust suppression agent. (40 CFR 61.154(c)(2))

d. Rather than meet the no visible emission requirement of 40 CFR 61.154(a), use an alternative emissions control method that has received prior written approval by the

appropriate AQD District Supervisor according to the procedures described in 40 CFR 61.149(c)(2). (40 CFR 61.154(d))

IV. DESIGN/EQUIPMENT PARAMETERS

1. The placement of gas collection devices determined in paragraph 40 CFR 60.759(a)(1) shall control all gas producing areas, except as provided by 40 CFR 60.759 (a)(3)(i) and (a)(3)(ii). (40 CFR 60.759(a)(3))

a. Any segregated area of asbestos or non-degradable material may be excluded from collection if documented as provided under 40 CFR 60.758(d). The documentation shall provide the nature, date of deposition, location and amount of asbestos or non-degradable material deposited in the area, and shall be provided to the AQD upon request. (40 CFR 60.759(a)(3)(i))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years (R 336.1213(3)(b)(ii))

1. For all asbestos-containing waste material received, the permittee of the active waste disposal site shall:

a. Maintain waste shipment records that include the following information: (40 CFR 61.154(e)(1))

i. The name, address, and telephone number of the waste generator. (40 CFR 61.154(e)(1)(i))

ii. The name, address, and telephone number of the transporter(s). (40 CFR 61.154(e)(1)(ii))

iii. The quantity of the asbestos-containing waste material in cubic meters (cubic yards). (40 CFR 61.154(e)(1)(iii))

iv. The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers. Report in writing to the local, State, or USEPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the local, State, or USEPA Regional office responsible for administering the asbestos NESHAP program for the disposal site, by the following working day, the presence of a significant amount of improperly enclosed or uncovered waste. Submit a copy of the waste shipment record along with the report. (40 CFR 61.154(e)(1)(iv))

v. The date of the receipt. (40 CFR 61.154(e)(1)(v))

b. As soon as possible and no longer than 30 days after receipt of the waste, send a copy of the signed waste shipment record to the waste generator. (40 CFR 61.154(e)(2))

c. Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the local, State, or

USEPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record). (40 CFR 61.154(e)(3))

2. The permittee shall maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area storage. (40 CFR 61.154(f))

3. The permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or non-degradable waste excluded from collection as provided in 40 CFR 60.759(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in 40 CFR 60.759(a)(3)(ii). (40 CFR 60.758(d)(2))

4. The permittee shall keep records of one the following regarding any active disposal site where asbestos containing materials have been deposited:

a. USEPA Testing Method 22 readings demonstrating no visible emissions from any active disposal site where asbestos containing materials have been deposited. These readings are to be taken for 15 minutes each operating day. (R 336.1213(3))

b. Records of the date asbestos waste is received, the amount and type of material that has been used to cover the asbestos waste, and documentation that the cover material was applied in the frequency required in SC III.1.c of this table. (40 CFR 61.154(c))

c. Records pursuant to an alternative emissions control method that has prior written approval of the AQD District Supervisor as noted in SC III.1.d of this table. (40 CFR 61.154(d))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. The permittee shall submit to the appropriate AQD District Supervisor, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities. (40 CFR 61.154(h))

5. The permittee shall furnish upon request and make available during normal business hours for inspection by the AQD, all records required by 40 CFR Part 61. (40 CFR 61.154(i))

6. Notify the AQD Technical Programs Unit and the appropriate AQD District Office in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the appropriate AQD District Office at least 10 working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. (40 CFR 61.154(j))

Include the following information in the notice:

- a. Scheduled starting and completion dates. (40 CFR 61.154(j)(1))
- b. Reason for disturbing the waste. (40 CFR 61.154(j)(2))
- c. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the AQD or may require changes in the emission control procedures to be used. (40 CFR 61.154(j)(3))
- d. Location of any temporary storage site and the final disposal site. (40 CFR 61.154(j)(4))

Facility appears to be in compliance with all applicable requirements for EUASBESTOS.

FGLANDFILL-000

DESCRIPTION: This flexible group represents the general MSW landfill with a required collection and control system. This flexible group contains 40 CFR Part 62, Subpart 000 requirements.

Emission Units: EULANDFILL, EUACTIVECOLL, EUOPENFLARE, EUASBESTOS

POLLUTION CONTROL EQUIPMENT: An open flare is used to combust the untreated landfill gas.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee must install a collection and control system that captures the landfill gas generated within the landfill according to the requirements in 40 CFR 62.16714(b) and 40 CFR 62.16714(c). (40 CFR 62.16714(a)(3))**
- 2. The permittee must route all the collected landfill gas to at least one of the following:**
 - a. An non-enclosed flare designed in accordance with 40 CFR 60.18 except as noted in 40 CFR 62.16722(d). (40 CFR 62.16714(c)(1))**
 - b. A control system designed and operated to reduce NMOC by 98 weight percent, or, when an enclosed combustion device is used for control, to either reduce NMOC by 98 weight percent or reduce the outlet NMOC concentration to less than 20 ppmv on dry basis, as hexane at 3% oxygen. (40 CFR 62.16714(c)(2))**
 - c. To a treatment system that processes the collected gas for subsequent sale or beneficial use. Venting of treated landfill gas to the ambient air is not allowed. If the treated landfill gas cannot be routed for subsequent sale or beneficial use, then the treated landfill gas must be controlled according to either 40 CFR 62.16714(c)(1) or (2). (40 CFR 62.16714(c)(3))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee must keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report that triggered 40 CFR 62.16714(e), the current amount of solid waste in place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. The permittee must keep all records on file in a format acceptable to the AQD District Supervisor and make them available upon request. (R 336.1213(3), 40 CFR 62.16726(a))**
- 2. Landfill owners or operators who convert design capacity from volume to mass or mass to volume to demonstrate that landfill design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, as provided in the definition of "design capacity", must keep readily accessible, on-site records of the annual recalculation of site-specific density, design capacity, and the supporting documentation. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. (40 CFR 62.16726(f))**
- 3. If reporting leachate or other liquids addition under 40 CFR 62.16724(l), the permittee must keep records of any engineering calculations or company records used to estimate the quantities of leachate or liquids added, the surface areas for which the leachate or liquids were applied, and the estimates of annual waste**

acceptance or total waste in place in the areas where leachate or liquids were applied. (40 CFR 62.16726(j))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. If complying with the operational provisions of 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961, as allowed in 40 CFR 62.16716, 40 CFR 62.16720, and 40 CFR 62.16722, the permittee must follow the semi-annual reporting requirements in 40 CFR 63.1981(h) in lieu of 40 CFR 62.16724(h). (40 CFR 62.16724(h))

5. The permittee must submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment. (40 CFR 62.16724(g))

a. The equipment removal report must contain all of the following items:

i. A copy of the closure report submitted in accordance with 40 CFR 62.16724(f). (40 CFR 62.16724(g)(1)(i))

ii. Dated copies of three successive NMOC emission rate reports demonstrating that the landfill is no longer producing 34 megagrams or greater of NMOC per year. (40 CFR 62.16724(g)(1)(iii))

iii. A copy of the initial performance test report demonstrating that the 15-year minimum control period has expired. (40 CFR 62.16724(g)(1)(ii))

b. The Administrator may request such additional information as may be necessary to verify that all of the conditions for removal in 40 CFR 62.16714(f) have been met. (40 CFR 62.16724(g)(2))

6. The permittee must submit a closure report to the appropriate AQD District Office within 30 days of waste acceptance cessation. The Administrator may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR 258.60. If a closure report has been submitted to the Administrator, no additional wastes may be placed into the landfill without filing a noti

7. The permittee must submit reports electronically according to the following:

a. Within 60 days after the date of completing each performance test (as defined in 40 CFR 60.8), the permittee must submit the results of each performance test. For data collected using test methods supported by the USEPA's Electronic Reporting Tool

(ERT) as listed on the USEPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>), submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI can be accessed through the USEPA's CDX (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the USEPA's ERT or an alternative file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website, once the XML schema is available. (40 CFR 62.16724(j)(1)(i))

b. For data collected using test methods that are not supported by the USEPA's ERT as listed on the USEPA's ERT website at the time of the test, submit the results of the performance test to the Administrator at the appropriate address listed in 40 CFR 60.4. (40 CFR 62.16724(j)(1)(ii))

c. Each permittee must submit reports to the USEPA via CEDRI (CEDRI can be accessed through the USEPA's CDX). The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. (40 CFR 62.16724(j)(2))

8. The permittee shall submit any performance test reports and all other reports required by 40 CFR Part 62, Subpart OOO to the appropriate AQD District Office, in a format approved by the AQD District Supervisor. (R 336.1213(3)(c), R 336.2001(5))

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENTS

1. If the permittee has submitted a design plan under 40 CFR 62.16724(d), the permittee must submit a revised design plan to the Administrator for approval as follows:

a. At least 90 days before expanding operations to an area not covered by the previously approved design plan. (40 CFR 62.16724(e)(1))

b. Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted to the Administrator under 40 CFR 62.16724(d). (40 CFR 62.16724(e)(2))

2. The collection and control system may be capped, removed, or decommissioned if the following criteria are met:

- a. The landfill is a closed landfill (as defined in 40 CFR 62.16730). A closure report must be submitted to the Administrator as provided in 40 CFR 62.16724(f). (40 CFR 62.16714(f)(1))
- b. The collection and control system must have been in operation a minimum of 15 years, or the landfill owner or operator demonstrates that the gas collection and control system will be unable to operate for 15 years due to declining gas flow. (40 CFR 62.16714(f)(2))
- c. Following the procedures specified in 40 CFR 62.16718(b), the calculated NMOC emission rate at the landfill is less than 34 Mg per year on three successive test dates. The test dates must be no less than 90 days apart, and no more than 180 days apart. (40 CFR 62.16714(f)(3))
3. The permittee must comply with all applicable provisions of the Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014 as specified in 40 CFR Part 62, Subpart OOO. Each permittee must comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961), for an MSW landfill with a gas collection and control system used to comply with the provisions of 40 CFR 62.16714 (b) and (c). Once the permittee begins to comply with the provisions of 40 CFR 63.1958, 40 CFR 63.1960 and 40 CFR 63.1961, the permittee must continue to operate the collection and control device according to those provisions and cannot return to the provisions of 40 CFR 62.16716, 40 CFR 62.16720 and 40 CFR 62.16722. (40 CFR 62.16716, 40 CFR 62.16720, 40 CFR 62.16722, 40 CFR Part 62, Subpart OOO)

Facility appears to be in compliance with all applicable conditions for FGLANDFILL-OOO. All reports are reviewed upon receipt and were received in a timely manner.

FGLANDFILL-AAAA

DESCRIPTION: This flexible group represents the general MSW landfill with a required collection and control system. This flexible group contains 40 CFR Part 63, Subpart AAAA requirements.

Emission Units: EULANDFILL, EUACTIVECOLL, EUOPENFLARE, EUASBESTOS

POLLUTION CONTROL EQUIPMENT: An open flare is used to combust the untreated landfill gas.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment
Methane	Less than 500 ppm above background level	Calendar Quarter	Surface of Landfill

	Actual: 45.3 - 178.4 ppm		
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II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.1955(c))

2. During periods of startup, shutdown, and malfunction (SSM), the permittee must comply with the work practices specified in 40 CFR 63.1958(e)(1). (40 CFR 63.1960(e)(2))

Facility appears to be in compliance.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee must install a collection and control system that captures the landfill gas generated within the landfill according to the requirements in 40 CFR 63.1959(b)(2)(ii) and 40 CFR 63.1959(b)(2)(iii). (40 CFR 63.1959(b)(2))

2. The permittee must route all the collected landfill gas to at least one of the following:

a. An open (non-enclosed) flare designed in accordance with 40 CFR 63.11(b) except as noted in 40 CFR 63.1959(e). (40 CFR 63.1959(b)(2)(iii)(A))

b. A control system designed and operated to reduce NMOC by 98 weight-percent, or, when an enclosed combustion device is used for control, to either reduce NMOC by 98 weight-percent or reduce the outlet NMOC concentration to less than 20 ppmv on dry basis, as hexane at 3% oxygen. (40 CFR 63.1959(b)(2)(iii)(B))

c. A treatment system that processes the collected gas for subsequent sale or beneficial use. If the treated landfill gas cannot be routed for subsequent sale or beneficial use, then the treated landfill gas must be controlled according to either 40 CFR 63.1959(b)(2)(iii)(A) or (B). (40 CFR 63.1959(b)(2)(iii)(C))

Facility appears to be in compliance.

V. TESTING/SAMPLING

Records must be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee must monitor surface concentrations of methane along the entire perimeter of the collection area and along a pattern that traverses the landfill at 30-

meter intervals (or a site-specific established spacing) for each collection area on a quarterly basis. (40 CFR 63.1960(c)(1))

Second quarter of 2024 was latest testing, next testing end of August 2024.

2. The permittee must conduct surface testing around the perimeter of the collection area and along a pattern that traverses the landfill at no more than 30-meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The owner or operator may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan must be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing. (40 CFR 63.1958(d)(1))

a. The permittee must conduct testing using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in 40 CFR 63.1960(d). (40 CFR 63.1958(d)(2)(i), 40 CFR 63.1960(c)(1))

b. The background concentration must be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells. (40 CFR 63.1960(c)(2))

c. Surface emission monitoring must be performed in accordance with 40 CFR Part 60, Appendix A-7, Method 21, Section 8.3.1, except that the probe inlet must be placed within 5 to 10 centimeters of the ground. Monitoring must be performed during typical meteorological conditions. (40 CFR 63.1960(c)(3))

d. The permittee must conduct surface testing at all cover penetrations and monitor any cover penetrations that are within an area of the landfill where waste has been placed and a gas collection system is required. (40 CFR 63.1958(d)(2)(ii))

e. The permittee must (40 CFR 63.1958(d)(2)(iii))

3. The permittee must document any reading of 500 ppm or more above background at any location as a monitored exceedance. As long as the following specified actions are taken, the exceedance is not a violation of the operational requirements of 40 CFR 63.1958(d). (40 CFR 63.1960(c)(4))

a. The location of each monitored exceedance must be marked, and the location recorded using an instrument with an accuracy of 4 meters with coordinates in decimal degrees and five decimal places. (40 CFR 63.1960(c)(4)(i))

b. Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance must be made and the location must be re-monitored within 10 calendar days of detecting the exceedance. (40 CFR 63.1960(c)(4)(ii))

c. If the re-monitoring of the location shows a second exceedance, additional corrective action must be taken and the location must be monitored again within 10 days of the second exceedance. If the re-monitoring shows a third exceedance for the same location, the action specified in SC V.3.e must be taken, and no further

monitoring of that location is required until the action specified in SC V.3.e has been taken. (40 CFR 63.1960(c)(4)(iii))

d. Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day re-monitoring specified in 40 CFR 63.1960(c)(4)(ii) or (iii) must be re-monitored 1 month from the initial exceedance. If the 1-month re-monitoring shows a concentration less than 500 ppm above backgrounds, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month re-monitoring shows an exceedance, the actions specified in SC V.3.c or SC V.3.e must be taken. (40 CFR 63.1960(c)(4)(iv))

e. For any location where monitored methane concentration equals or exceeds 500 ppm above backgrounds three times within a quarterly period, a new well or other collection device must be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Department for approval. (40 CFR 63.1960(c)(4)(v))

4. The permittee must comply with instrumentation specifications and procedures in 40 CFR 63.1960(d) for surface emission monitoring devices: (40 CFR 63.1960(d))

a. The portable analyzer must meet the instrument specifications provided in 40 CFR Part 60, Appendix A-7, Method 21, except that "methane" must replace all references to VOC. (40 CFR 63.1960(d)(1))

b. The calibration gas must be methane, diluted to a nominal concentration of 500 ppm in air. (40 CFR 63.1960(d)(2))

c. To meet the performance evaluation requirements in 40 CFR Part 60, Appendix A-7, Method 21, the instrument evaluation procedures of 40 CFR Part 60, Appendix A-7, Method 21 must be used. (40 CFR 63.1960(d)(3))

d. The calibration procedures provided in 40 CFR Part 60, Appendix A-7, Method 21 must be followed immediately before commencing a surface monitoring survey. (40 CFR 63.1960(d)(4))

5. Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring. (40 CFR 63.1961(f))

Facility appears to be in compliance.

VI. MONITORING/RECORDKEEPING

Records must be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee must keep records of the surface methane monitoring including, at a minimum, the following information:

a. The route traversed including any areas not monitored because of unsafe conditions (i.e., truck traffic, construction, active face, dangerous areas, etc.) and

areas included where visual observations indicate elevated levels of landfill gas. (40 CFR 63.1960(c)(1))

b. The location(s) and concentrations of the methane readings and noting any reading of 500 ppm or more above background. (40 CFR 63.1960(c)(4))

c. The meteorological conditions the day of the testing including wind speed, wind direction, and temperature. (R 336.1213(3))

The permittee must keep all records on file in a format acceptable to the AQD District Supervisor and make them available upon request. (R 336.1213(3), 40 CFR 63.1960(c))

2. The permittee must implement a program to monitor, on a monthly basis, for cover integrity and implement cover repairs as necessary. Records of the cover integrity and any cover repairs must be kept on file in a format acceptable to the AQD District Supervisor and made available upon request. (R 336.1213(3), 40 CFR 63.1960(c)(5))

3. The permittee must keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report that triggered 40 CFR 63.1959(b), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. The permittee must keep all records on file in a format acceptable to the AQD District Supervisor and make them available upon request. (R 336.1213(3), 40 CFR 63.1983(a))

Facility appears to be in compliance.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. The permittee must submit reports which must be postmarked or received by the appropriate AQD District Office by March 15 for reporting period January 1 to December 31. The reports must include the location of each exceedance of the 500 ppm methane concentrations as provided in 40 CFR 63.1958(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month. The reports must also include information on all deviations that occurred during the 6-month reporting period. (40 CFR 63.1981(h)(5))

5. The permittee of a controlled landfill must submit an equipment removal report to the Department 30 days prior to removal or cessation of operation of the control equipment. (40 CFR 63.1981(g))

a. The equipment removal report must contain all the following items:

i. A copy of the closure report submitted in accordance with 40 CFR 63.1981(f). (40 CFR 63.1981(g)(1)(i))

ii. A copy of the initial performance test report demonstrating that the 15-year minimum control period has expired, or information that demonstrates that the gas collection and control system will be unable to operate for 15 years due to declining gas flows. In the equipment removal report, the process unit(s) tested, the pollutant(s) tested, and the date that such performance test was conducted may be submitted in lieu of the performance test report if the report has been previously submitted to the USEPA's Central Data Exchange (CDX). (40 CFR 63.1981(g)(1)(ii))

iii. Dated copies of three successive NMOC emission rate reports demonstrating that the landfill is no longer producing 50 Mg or greater of NMOC per year. If the NMOC emission rate reports have been previously submitted to the USEPA's CDX, a statement that the NMOC emission rate reports have been submitted electronically and the dates that the reports were submitted to the USEPA's CDX may be submitted in the equipment removal report in lieu of the NMOC emission rate reports. (40 CFR 63.1981(g)(1)(iii))

b. The Department may request such additional information as may be necessary to verify that all of the conditions for removal in 40 CFR 63.1957(b) have been met. (40 CFR 63.1981(g)(2))

6. The permittee of a controlled landfill must submit a closure report to the Department within 30 days of waste acceptance cessation. The Department may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR 258.60. If a closure report has been submitted to the Department, no additional wastes may be placed into the landfill without filing a notification of modification as described under 40 CFR 63.9(b). (40 CFR 63.1981(f))

7. The permittee must submit reports electronically according to the following:

a. Within 60 days after the date of completing each performance test required, submit the results of the performance test with data collected using test methods supported by the USEPA's Electronic Reporting Tool (ERT) as listed on the USEPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>). Submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the USEPA's CDX (<https://cdx.epa.gov/>). The data must be submitted in a file format generated through the use of the USEPA's ERT. Alternatively, submit an electronic file consistent with the extensible markup language (XML) schema listed on the USEPA's ERT website. (40 CFR 63.1981(l)(1)(i))

b. For data collected using test methods that are not supported by the USEPA's ERT as listed on the USEPA's ERT website, the results of the performance test must be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the USEPA's ERT website. Submit the ERT generated package or alternative file to the USEPA via CEDRI. (40 CFR 63.1981(l)(1)(ii))

c. Each permittee must submit reports to the USEPA via CEDRI. CEDRI can be accessed through the USEPA's CDX. The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format

consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). Once the spreadsheet template upload/forms for the reports have been available in CEDRI for 90 days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. The NMOC emission rate reports, and semiannual reports, should be electronically reported as a spreadsheet template upload/form to CEDRI. If the reporting forms specific to this subpart are not available in CEDRI at the time that the reports are due, the permittee must submit the reports to the USEPA at the appropriate address listed in 40 CFR 63.13. (40 CFR 63.1981(l)(2))

8. The permittee shall submit any performance test reports and all other reports required by 40 CFR Part 63, Subpart AAAA to the appropriate AQD District Office, in a format approved by the AQD District Supervisor. (R 336.1213(3)(c), R 336.2001(5))

All reports are reviewed when received. Reports received in a timely manner. Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENTS

1. If the permittee has submitted a design plan under 40 CFR 63.1981(d), the permittee must submit a revised design plan to the Department for approval as follows:

- a. At least 90 days before expanding operations to an area not covered by the previously approved design plan. (40 CFR 63.1981(e)(1))
- b. Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted under 40 CFR 63.1981(d). (40 CFR 63.1981(e)(2))

2. The collection and control system may be capped, removed, or decommissioned if the following criteria are met:

- a. The landfill is a closed landfill (as defined in 40 CFR 63.1990). A closure report must be submitted to the Department as provided in 40 CFR 63.1981(f). (40 CFR 63.1957(b)(1))
- b. The gas collection and control system has been in operation a minimum of 15 years or the permittee demonstrates that the gas collection and control system will be unable to operate for 15 years due to declining gas flow. (40 CFR 63.1957(b)(2))
- c. Following the procedures specified in 40 CFR 63.1959(c), the calculated NMOC gas produced by the landfill must be less than 50 Mg/yr on three successive test dates. The test dates must be no less than 90 days apart, and no more than 180 days apart. (40 CFR 63.1957(b)(3))

3. The permittee must comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

as specified in 40 CFR Part 63, Subparts A and AAAA. (40 CFR Part 63, Subparts A and AAAA)

Facility appears to be in compliance.

FGACTIVECOLL-000

DESCRIPTION: This flexible group represents the active landfill gas collection system that uses gas mover equipment to draw landfill gas from the wells and moves the gas to the control equipment. This flexible group contains 40 CFR Part 62, Subpart 000 requirements.

Emission Units: EUACTIVECOLL

POLLUTION CONTROL EQUIPMENT: An open flare is used to combust the untreated landfill gas.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee must install an active collection system that meets the following requirements:

a. Designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control system equipment. (40 CFR 62.16714(b)(2)(i))

b. Collects gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active; or 2 years or more if closed or at final grade. (40 CFR 62.16714(b)(2)(ii))

c. Collects gas at a sufficient extraction rate. (40 CFR 62.16714(b)(2)(iii))

d. Designed to minimize off-site migration of subsurface gas. (40 CFR 62.16714(b)(2)(iv))

2. The permittee must route the collected gas to a treatment system that processes the collected gas for subsequent sale or beneficial use such as fuel for combustion, production of vehicle fuel, production of high-BTU gas for pipeline injection, or use as a raw material in a chemical manufacturing process. Venting of treated landfill gas to the ambient air is not allowed. If the treated landfill gas cannot be routed for subsequent sale or beneficial use, then the treated landfill gas must be controlled according to either 40 CFR 62.16714(c)(1) or (2). (40 CFR 62.16714(c)(3))

3. The permittee must site active gas collection devices as required in 40 CFR 62.16728 and must control all gas producing areas, except as provided below.

a. Any segregated area of asbestos or non-degradable material may be excluded from collection if documented as provided under 40 CFR 62.16726(d). (40 CFR 62.16728(a)(3)(i))

b. Any nonproductive area of the landfill may be excluded from control, provided that the total of all excluded areas can be shown to contribute less than 1 percent of the total amount of NMOC emissions from the landfill. The amount, location, and age of the material must be documented. A separate NMOC emissions estimate must be made for each section proposed for exclusion, and the sum of all such sections must be compared to the NMOC emissions estimate for the entire landfill. Emissions from each section must be computed using the equation in Appendix 7-1. (40 CFR 62.16728(a)(3)(ii))

Facility appears to be in compliance.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Each permittee that chooses to comply with the provisions in 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961, as allowed in 40 CFR 62.16716, 40 CFR 62.16720, and 40 CFR 62.16722, must keep records of the date upon which the permittee started complying with the provisions in 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961 and must keep records according to 40 CFR 63.1983(e)(1) through (5). (40 CFR 62.16726(e))

2. The permittee must keep up-to-date, readily accessible records for the life of the control equipment of the data where the permittee seeks to demonstrate compliance with 40 CFR 62.16714(b) listed as follows:

a. The maximum expected gas generation flow rate as calculated in 40 CFR 62.16720 (a)(1). (40 CFR 62.16726(b)(1)(i))

b. The density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR 62.16728(a) (1). (40 CFR 62.16726(b)(1)(ii))

3. The permittee must keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector that matches the labeling on the plot map and the following up-to-date, readily accessible records. (40 CFR 62.16726(d))

a. The installation date and location of all newly installed collectors as specified under 40 CFR 62.16720(b). (40 CFR 62.16726(d)(1))

b. Documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in 40 CFR 62.16728(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in 40 CFR 62.16728(a)(3)(ii). (40 CFR 62.16726(d)(2))

4. The permittee must maintain the following information:

a. A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for the future collection system expansion. (40 CFR 62.16724(i)(1))

b. The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based. (40 CFR 62.16724(i)(2))

c. The documentation of the presence of asbestos or non-degradable material for each area from which collection wells have been excluded based on the presence of asbestos or non-degradable material. (40 CFR 62.16724(i)(3))

d. The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on non-productivity and the calculations of gas generation flow rate for each excluded area. (40 CFR 62.16724(i)(4))

e. The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill. (40 CFR 62.16724(i)(5))

f. The provisions for the control of off-site migration. (40 CFR 62.16724(i)(6))

The facility appears to be in compliance. Facility is currently looking at a new project of adding additional 15-30 wells.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. If complying with the operational provisions of 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961, as allowed at 40 CFR 62.16716, 40 CFR 62.16720, and 40 CFR 62.16722, the permittee must follow the semi-annual reporting requirements in 40 CFR 63.1981(h) in lieu of 40 CFR 62.16724(h). (40 CFR 62.16724(h))

5. If complying with the operational provisions of 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961, as allowed in 40 CFR 62.16716, 40 CFR 62.16720, and 40 CFR

62.16722, the permittee must follow the corrective action and the corresponding timeline reporting requirements in 40 CFR 63.1981(j) in lieu of 40 CFR 62.16724(k). (40 CFR 62.16724(k))

6. The permittee must submit reports electronically according to the following:

a. Within 60 days after the date of completing each performance test (as defined in 40 CFR 60.8), the permittee must submit the results of each performance test. For data collected using test methods supported by the USEPA's Electronic Reporting Tool (ERT) as listed on the USEPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>), submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI can be accessed through the USEPA's CDX (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the USEPA's ERT or an alternative file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website, once the XML schema is available. (40 CFR 62.16724(j)(1)(i))

b. For data collected using test methods that are not supported by the USEPA's ERT as listed on the USEPA's ERT website at the time of the test, submit the results of the performance test to the USEPA at the appropriate address listed in 40 CFR 60.4. (40 CFR 62.16724(j)(1)(ii))

c. Each permittee must submit reports to the USEPA via CEDRI (CEDRI can be accessed through the USEPA's CDX). The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. (40 CFR 62.16724(j)(2))

7. The permittee shall submit any performance test reports and all other reports required by 40 CFR Part 62, Subpart OOO to the appropriate AQD District Office, in a format approved by the AQD District Supervisor. (R 336.1213(3)(c), R 336.2001(5))

All records are reviewed upon receipt. Records are received in a timely manner. Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENTS

1. The permittee must comply with all applicable provisions of the Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014 as specified in 40 CFR Part 62, Subpart OOO. Each permittee must comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the

provisions in 40 CFR 63.1960 and 40 CFR 63.1961), for an MSW landfill with a gas collection and control system used to comply with the provisions of 40 CFR 62.16714 (b) and (c). Once the permittee begins to comply with the provisions of 40 CFR 63.1958, 40 CFR 63.1960 and 40 CFR 63.1961, the permittee must continue to operate the collection and control device according to those provisions and cannot return to the provisions of 40 CFR 62.16716, 40 CFR 62.16720 and 40 CFR 62.16722. (40 CFR 62.16716, 40 CFR 62.16720, 40 CFR 62.16722, 40 CFR Part 62, Subpart OOO)

FGACTIVECOLL-AAAA

DESCRIPTION: This flexible group represents the active landfill gas collection system that uses gas mover equipment to draw landfill gas from the wells and moves the gas to the control equipment. This flexible group contains 40 CFR Part 63, Subpart AAAA requirements.

Emission Unit: EUACTIVECOLL

POLLUTION CONTROL EQUIPMENT: An open flare is used to combust the untreated landfill gas.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee must operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for:

- a. 5 years or more if active; or (40 CFR 63.1958(a)(1))
- b. 2 years or more if closed or at final grade. (40 CFR 63.1958(a)(2))

2. The permittee must operate the collection system with negative pressure at each wellhead except under the following conditions:

- a. A fire or increased well temperature. (40 CFR 63.1958(b)(1))
- b. Use of a geo-membrane or synthetic cover. The permittee must develop acceptable pressure limits in the design plan. (40 CFR 63.1958(b)(2))
- c. A decommissioned well. A well may experience a static positive pressure after shut-down to accommodate for declining flows. (40 CFR 63.1958(b)(3))

3. The permittee must operate each interior wellhead in the collection system under the following conditions:

- a. Operate each interior wellhead in the collection system with a landfill gas temperature less than 62.8°C (145°F). (40 CFR 63.1958(c)(1))

b. A higher operating temperature value may be established at a particular well. A higher operating value demonstration must be submitted to the Department for approval and must include supporting data that the elevated parameter does not cause fires nor significantly inhibit anaerobic decomposition by killing methanogens. (40 CFR 63.1958(c)(2))

4. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.1955(c))

Facility appears to be in compliance.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee must operate the system in accordance with 40 CFR 63.1955(c) such that all collected gases are vented to a control system designed and operated in compliance with 40 CFR 63.1959(b)(2)(iii). (40 CFR 63.1958(e)(1))

a. In the event the collection or control system is not operating, the gas mover system must be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere must be closed within 1 hour of the collection or control system not operating. (40 CFR 63.1958(e)(1)(i))

b. Efforts by the permittee to repair the collection or control system must be initiated and completed in a manner such that downtime is kept to a minimum, and the collection and control system must be returned to operation. (40 CFR 63.1958(e)(1)(ii))

2. The permittee must install an active collection system that meets the following requirements:

a. Designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment. (40 CFR 63.1959(b)(2)(ii)(B)(1))

b. Each well must be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of 5 years or more if active; or 2 years or more if closed or at final grade. (40 CFR 63.1960(b), 40 CFR 63.1959(b)(2)(ii)(B)(2))

c. Collects gas at a sufficient extraction rate. (40 CFR 63.1959(b)(2)(ii)(B)(3))

d. Designed to minimize off-site migration of subsurface gas. (40 CFR 63.1959(b)(2)(ii)(B)(4))

3. The permittee must install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead. (40 CFR 63.1961(a))

4. The permittee must

5. The permittee must site active gas collection devices as required in 40 CFR 63.1962 and must control all gas producing areas, except as provided below.

a. Any segregated area of asbestos or non-degradable material may be excluded from collection if documented as provided under 40 CFR 63.1983(d). (40 CFR 63.1962 (a)(3)(i))

b. Any nonproductive area of the landfill may be excluded from control, provided that the total of all excluded areas can be shown to contribute less than 1 percent of the total amount of NMOC emissions from the landfill. The amount, location, and age of the material must be documented. A separate NMOC emissions estimate must be made for each section proposed for exclusion, and the sum of all such sections must be compared to the NMOC emissions estimate for the entire landfill. Emissions from each section must be computed using the equation in Appendix 7-1. (40 CFR 63.1962 (a)(3)(ii))

Facility appears to be in compliance.

V. TESTING/SAMPLING

Records must be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records must be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with 40 CFR 63.1959(b)(2)(ii)(B)(3), the permittee must measure, on a monthly basis, the gauge pressure in the gas collection header at each individual well as provided in 40 CFR 63.1960(a)(3) and 40 CFR 63.1961(a)(1). Any attempted corrective measure must not cause exceedances of other operational or performance standards.

a. If positive pressure exists, action must be initiated to correct the exceedance within five calendar days. (40 CFR 63.1960(a)(3)(i))

b. If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement of positive pressure, the permittee must conduct a root cause analysis and correct the exceedance as soon as practicable, but no later than 60 days after positive pressure was first measured. (40 CFR 63.1960 (a)(3)(i)(A))

c. If corrective actions cannot be fully implemented within 60 days following the positive pressure measurement for which the root cause analysis was required, the permittee must also conduct a corrective action analysis and develop an implementation schedule to complete the corrective action(s) as soon as practicable, but no more than 120 days following the positive pressure measurement. (40 CFR 63.1960(a)(3)(i)(B))

d. If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the permittee must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Department as soon as practicable but no later than 75 days after the first measurement of positive pressure or above, according to 40 CFR 63.1981(j). (40 CFR 63.1960(a)(3)(i)(C))

2. The permittee must monitor each well monthly for temperature for the purpose of identifying whether excess air infiltration exists as provided in 40 CFR 63.1958(c)(1) and 40 CFR 63.1961(a)(4). If a well exceeds the operating parameter for temperature, the following corrective actions must be taken:

a. Action must be initiated to correct the exceedance within 5 calendar days. Any attempted corrective measure must not cause exceedances of other operational or performance standards. (40 CFR 63.1960(a)(4)(i))

b. If a landfill gas temperature less than 62.8°C (145°F) cannot be achieved within 15 calendar days of the first measurement of landfill gas temperature greater than 62.8°C (145°F), the permittee must conduct a root cause analysis and correct the exceedance as soon as practicable, but no later than 60 days after a landfill gas temperature greater than 62.8°C (145°F) was first measured. (40 CFR 63.1960(a)(4)(i)(A))

c. If corrective actions cannot be fully implemented within 60 days following the temperature measurement for which the root cause analysis was required, the permittee must also conduct a corrective action analysis and develop an implementation schedule to complete the corrective action(s) as soon as practicable, but no more than 120 days following the measurement of landfill gas temperature greater than 62.8°C (145°F). (40 CFR 63.1960(a)(4)(i)(B))

d. If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the permittee must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Department as soon as practicable but no later than 75 days after the first measurement of temperature monitoring value of 62.8°C (145°F) or above, according to 40 CFR 63.1981(h)(7) and 40 CFR 63.1981(j). (40 CFR 63.1960(a)(4)(i)(C))

e. 76.7°C (170°F) 62.8°C (145°F) 40 CFR 63.1960(a)(4)(i)(D))

3. The permittee must monitor, on a monthly basis, the nitrogen or oxygen concentration in the landfill gas using the procedures in 40 CFR 63.1961(a)(2)(i) or (ii). (40 CFR 63.1961(a)(2))

4. Unless a higher operating temperature value has been approved by the Department under this subpart or under 40 CFR Part 60, Subpart WWW; 40 CFR Part 60, Subpart XXX; or a federal plan or USEPA-approved and effective state plan that implements either 40 CFR Part 60, Subpart Cc or 40 CFR Part 60, Subpart Cf, the permittee must initiate enhanced monitoring at each well with a landfill gas temperature greater than 62.8°C (145°F) as follows:

a. (40 CFR 63.1961(a)(5)(i))

b. (40 CFR 63.1961(a)(5)(ii))

c. (40 CFR 63.1961(a)(5)(iii))

d. Monitor the landfill gas every 10 vertical feet of the well as provided in SC VI.5. (40 CFR 63.1961(a)(5)(iv))

e. . (40 CFR 63.1961(a)(5)(v))

f. Monitor the carbon monoxide concentrations as follows:

i. listed in 40 CFR 60, Appendix A, or an equivalent method (40 CFR 63.1961(a)(5)(vi)(A))

ii. listed in 40 CFR 60, Appendix A(40 CFR 63.1961(a)(5)(vi)(B))

iii. When sampling directly from the wellhead, sample for 5 minutes plus twice the response time of the analyzer. These values must be recorded. The five 1-minute averages are then averaged to give you the carbon monoxide reading at the wellhead. (40 CFR 63.1961(a)(5)(vi)(C))

iv. When collecting samples in a passivated canister or multi-layer foil sampling bag, sample for the period of time needed to assure that enough sample is collected to provide five (5) consecutive, 1-minute samples during the analysis of the canister or bag contents, but no less than 5 minutes plus twice the response time of the analyzer. The five (5) consecutive, 1-minute averages are then averaged together to give a carbon monoxide value from the wellhead. (40 CFR 63.1961(a)(5)(vi)(D))

g. 62.8°C (145°F). (40 CFR 63.1961(a)(5)(vii))

h. (40 CFR 63.1961(a)(5)(viii))

62.8°C (145°F). (40 CFR 63.1961(a)(5)(ix))

5. 73.9°C (165°F) (40 CFR 63.1961(a)(6))

6. The permittee must keep, on a monthly basis, readily accessible records of the following:

a. All collection and control system exceedances of the operational standards in 40 CFR 63.1958, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance. (40 CFR 63.1983(e)(1))

The records of each wellhead temperature monitoring value of 62.8°C (145°F) or above. (40 CFR 63.1983(e)(2)(i))

c. required to conduct the enhanced monitoring provisions in 40 CFR 63.1961(a)(5), (40 CFR 63.1983(e)(2)(ii))

d. in 40 CFR 63.1981(k)(40 CFR 63.1983(e)(2)(iii))

e. For any root cause analysis for which corrective actions are required in 40 CFR 63.1960(a)(3)(i)(A) or (a)(4)(i)(A), keep a record of the root cause analysis conducted, including a description of the recommended corrective action(s) taken, and the date (s) the corrective action(s) were completed. (40 CFR 63.1983(e)(3))

f. For any root cause analysis for which corrective actions are required in 40 CFR 63.1960(a)(3)(i)(B) or (a)(4)(i)(B), keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the positive pressure reading or high temperature reading, and, for action (s) not already completed, a schedule for implementation, including proposed commencement and completion dates. (40 CFR 63.1983(e)(4))

g. For any root cause analysis for which corrective actions are required in 40 CFR 63.1960(a)(3)(i)(C) or (a)(4)(i)(C), keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the positive pressure reading or high temperature reading, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates, and a copy of any comments or final approval on the corrective action analysis or schedule from the Department. (40 CFR 63.1983 (e)(5))

7. The permittee must keep up-to-date, readily accessible records for the life of the control equipment of the data listed as follows:

a. The maximum expected gas generation flow rate as calculated in 40 CFR 63.1960 (a)(1). (40 CFR 63.1983(b)(1)(i))

b. The density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR 63.1962(a) (1) and (2). (40 CFR 63.1983(b)(1)(ii))

8. The permittee must record the date, time, and duration of each startup and/or shutdown periods when the affected source was subject to the standard applicable to startup and shutdown. (40 CFR 63.1983(c)(6))

9. Where the permittee seeks to demonstrate compliance with the operational standard in 40 CFR 63.1958(e)(1), in the event that an affected unit fails to meet an applicable standard, the permittee shall record the following information:

a. The date, time, and duration of each failure and the cause of the events (including unknown cause, if applicable). (40 CFR 63.1983(c)(7)(i))

b. For each failure to meet an applicable standard; record and retain a list of the affected sources or equipment. (40 CFR 63.1983(c)(7)(ii))

c. Record actions taken to minimize emissions in accordance with the general duty of 40 CFR 63.1955(c) and any corrective actions taken to return the affected unit to its normal or usual manner of operation. (40 CFR 63.1983(c)(7)(iii))

10. The permittee must keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector; and the installation date and location of all newly installed collectors as specified under 40 CFR 63.1960 (b). (40 CFR 63.1983(d), 40 CFR 63.1983(d)(1))

11. The permittee must maintain the following information:

a. A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for the future collection system expansion. (40 CFR 63.1981(i)(1))

b. The documentation of the presence of asbestos or non-degradable material for each area from which collection wells have been excluded based on the presence of asbestos or non-degradable material. (40 CFR 63.1981(i)(3))

c. The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on non-productivity and the calculations of gas generation flow rate for each excluded area. (40 CFR 63.1981(i)(4))

d. The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill. (40 CFR 63.1981(i)(5))

e. The provisions for the control of off-site migration. (40 CFR 63.1981(i)(6))

Facility appears to be in compliance.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. The permittee using an active collection system designed in accordance with 40 CFR 63.1959(b)(2)(ii) must submit to the Department semiannual reports. The semiannual reports must include the following information:

a. Number of times the applicable parameters monitored under 40 CFR 63.1958(b), (c) and (d) were exceeded and when the gas collection and control system was not operating under 40 CFR 63.1958(e), including periods of SSM. For each instance, report the date, time, and duration of each exceedance. (40 CFR 63.1981(h)(1))

b. Where the permittee seeks to demonstrate compliance with the temperature and nitrogen or oxygen operational standards in introductory paragraph 40 CFR 63.1958 (c), provide a statement of the wellhead operational standard for temperature and oxygen for the period covered by the report. Indicate the number of times each of those parameters monitored under 40 CFR 63.1961(a)(3) were exceeded. For each instance, report the date, time, and duration of each exceedance. (40 CFR 63.1981(h)(1)(i))

c. Where the permittee seeks to demonstrate compliance with the operational standard for temperature in 40 CFR 63.1958(c)(1), provide a statement of the wellhead operational standard for temperature and oxygen for the period covered by the report. Indicate the number of times each of those parameters monitored under 40 CFR 63.1961(a)(4) were exceeded. For each instance, report the date, time, and duration of each exceedance. (40 CFR 63.1981(h)(1)(ii))

d. The date of installation and the location of each well or collection system expansion added pursuant to 40 CFR 63.1960(a)(3) and (a)(4), (b), and (c)(4). (40 CFR 63.1981(h)(6))

e. The permittee must record instances when a positive pressure occurs in efforts to avoid fire. (40 CFR 63.1958(b)(1))

f. Include any corrective action analysis for which corrective actions are required in 40 CFR 63.1960(a)(3)(i) or (a)(5) and that take more than 60 days to correct the exceedance, the root cause analysis conducted, including a description of the recommended corrective action(s), the date for corrective action(s) already completed following the positive pressure or high temperature reading, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates. (40 CFR 63.1981(h)(7))

g. Each permittee required to conduct enhanced monitoring in 40 CFR 63.1961(a)(5) and (6) must include the results of all monitoring activities conducted during the period; (40 CFR 63.1981(h)(8))

i. For each monitoring point, report the date, time, and well identifier along with the value and units of measure for oxygen, temperature (wellhead and downwell), methane, and carbon monoxide. (40 CFR 63.1981(h)(8)(i))

ii. Include a summary trend analysis for each well subject to the enhanced monitoring requirements to chart the weekly readings over time for oxygen, wellhead temperature, methane, and weekly or monthly readings over time, as applicable for carbon monoxide. (40 CFR 63.1981(h)(8)(ii))

iii. Include the date, time, staff person name, and description of findings for each visual observation for subsurface oxidation event. (40 CFR 63.1981(h)(8)(iii))

5. The permittee must submit information regarding corrective actions as follows:

a. For corrective action that is required according to 40 CFR 63.1960(a)(3) or (a)(4) and is not completed within 60 days after the initial exceedance, submit a notification to the Department as soon as practicable but no later than 75 days after the first measurement of positive pressure or temperature exceedance. (40 CFR 63.1981(j)(1))

b. For corrective action that is required according to 40 CFR 63.1960(a)(3) or (4) and is expected to take longer than 120 days after the initial exceedance to complete, submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Department as soon as practicable but no later than 75 days after the first measurement of positive pressure or temperature monitoring value of 62.8°C (145°F) or above. The Department must approve the plan for corrective action and the corresponding timeline. (40 CFR 63.1981(j)(2))

6. Where the permittee seeks to demonstrate compliance with the operational standard for temperature in 40 CFR 63.1958(c)(1) and a landfill gas temperature measured at either the wellhead or at any point in the well is greater than or equal to 76.7°C (170°F) and the carbon monoxide concentration measured is greater than or equal to 1,000 ppmv, report the date, time, well identifier, temperature and carbon monoxide reading via email to the Department within 24 hours of the measurement unless a higher operating temperature value has been approved by the Department for the well under this subpart or under 40 CFR Part 60, Subpart WWW; 40 CFR Part 60, Subpart XXX; or a Federal plan or USEPA approved and effective state plan that implements either 40 CFR Part 60, Subpart Cc or 40 CFR Part 60, Subpart Cf. (40 CFR 63.1981(k))

7. The permittee must submit reports electronically according to the following:

a. Within 60 days after the date of completing each performance test required, submit the results of the performance test with data collected using test methods supported by the USEPA's Electronic Reporting Tool (ERT) as listed on the USEPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>). Submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the USEPA's CDX (<https://cdx.epa.gov/>). The data must be submitted in a file format generated through the use of the USEPA's ERT. Alternatively, submit an electronic file consistent with the extensible markup language (XML) schema listed on the USEPA's ERT website. (40 CFR 63.1981(l)(1)(i))

b. For data collected using test methods that are not supported by the USEPA's ERT as listed on the USEPA's ERT website, the results of the performance test must be included as an attachment in the ERT or an

alternate electronic file consistent with the XML schema listed on the USEPA's ERT website. Submit the ERT generated package or alternative file to the USEPA via CEDRI. (40 CFR 63.1981(l)(1)(ii))

c. Each permittee must submit reports to the USEPA via CEDRI. CEDRI can be accessed through the USEPA's CDX. The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). Once the spreadsheet template upload/forms for the reports have been available in CEDRI for 90 days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. The semiannual reports should be electronically reported as a spreadsheet template upload/form to CEDRI. If the reporting forms specific to this subpart are not available in CEDRI at the time that the reports are due, the permittee must submit the reports to the USEPA at the appropriate address listed in 40 CFR 63.13. (40 CFR 63.1981(l)(2))

8. The permittee shall submit all monitoring activities and all other reports required by 40 CFR Part 63, Subpart AAAA to the appropriate AQD District Office, in a format approved by the AQD District Supervisor. (R 336.1213(3)(c), R 336.2001(5))

Reports are reviewed when received. Reports were received in a timely manner. Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENTS

1. The permittee must comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

as specified in 40 CFR Part 63, Subparts A and AAAA. (40 CFR Part 63, Subparts A and AAAA)

FGOPENFLARE-OOO

DESCRIPTION: Open (non-enclosed) flare is an open combustor without enclosure or shroud. This flexible group contains 40 CFR Part 62, Subpart OOO requirements.

Emission Unit: EUOPENFLARE

POLLUTION CONTROL EQUIPMENT: Open (non-enclosed) flare

I. EMISSION LIMIT(S)

1. There must be no visible emissions from EUOPENFLARE except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. (40 CFR 60.18(c)(1))

Facility appears to be in compliance.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must operate the flare in accordance with 40 CFR 60.18. (40 CFR 62.16714(c)(1))

2. The flare must be operated with a flame present at all times. (40 CFR 60.18(c)(2))

Facility appears to be in compliance.

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee must verify visible emissions from EUOPENFLARE, by testing at owner's expense, in accordance with Department requirements. Testing must be performed using an approved USEPA Method 22 listed in 40 CFR Part 60, Appendix A. No less than 30 days prior to testing, the permittee must submit a complete test plan to the AQD Technical Programs Unit and the appropriate District Office. The AQD must approve the final plan prior to testing. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and the appropriate District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.18(f))

2. The permittee must verify the following:

a. The net heating value of the gas being combusted in the flare must be calculated and recorded using the equation provided in Appendix 7-1. (40 CFR 60.18(f)(3))

b. The exit velocity for steam-assisted, air-assisted, or non-assisted flares as determined by the methods provided in Appendix 7-1. (40 CFR 60.18(f)(5) and (6))

3. Within 180 days of permit re-issuance, the permittee must verify visible emissions, the net heating value, and exit velocity from EUOPENFLARE and at a minimum, every five years from the date of the last test, thereafter. (R 33

4. The permittee must notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))

Facility appears to be in compliance.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee must keep up-to-date, readily accessible records for the life of the control equipment of the data as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring must be maintained for a minimum of 5 years. Records of the control device vendor specifications must be maintained until removal. (40 CFR 62.16726(b))

2. Where the permittee seeks to demonstrate compliance with 40 CFR 62.16714(c)(1) through use of a non-enclosed flare, the flare type (i.e., steam-assisted, air-assisted, or non-assisted), all visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations made during the performance test as specified in 40 CFR 60.18; and continuous records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the pilot flame or the flare flame is absent. (40 CFR 62.16726(b)(4))

3. The following records for the flare must be maintained onsite:

a. The net heating value of the gas being combusted in the flare must be calculated and recorded using the equation provided in Appendix 7-1. (40 CFR 60.18(f)(3))

b. The exit velocity for steam-assisted, air-assisted, or non-assisted flares as determined by the methods specified in 40 CFR 60.18(f)(4) provided in Appendix 7-1. (40 CFR 60.18(f)(4))

4. Each permittee that chooses to comply with the provisions in 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961, as allowed in 40 CFR 62.16716, 40 CFR 62.16720, and 40 CFR 62.16722, must keep records of the date upon which the permittee started complying with the provisions in 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961. (40 CFR 62.16726(e))

Facility appears to be in compliance.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. If complying with the operational provisions of 40 CFR 63.1958, 40 CFR 63.1960, and 40 CFR 63.1961, as allowed at 40 CFR 62.16716, 40 CFR 62.16720, and 40 CFR 62.16722, the permittee must follow the semi-annual reporting requirements in 40 CFR 63.1981(h) in lieu of 40 CFR 62.16724(h). (40 CFR 62.16724(h))

5. The permittee must submit reports electronically according to the following:

a. Within 60 days after the date of completing each performance test (as defined in 40 CFR 60.8), the permittee must submit the results of each performance test. For data collected using test methods supported by the USEPA's Electronic Reporting Tool (ERT) as listed on the USEPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>), submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI can be accessed through the USEPA's CDX (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the USEPA's ERT or an alternative file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website, once the XML schema is available. (40 CFR 62.16724(j)(1)(i))

b. For data collected using test methods that are not supported by the USEPA's ERT as listed on the USEPA's ERT website at the time of the test, submit the results of the performance test to the USEPA at the appropriate address listed in 40 CFR 60.4. (40 CFR 62.16724(j)(1)(ii))

c. Each permittee must submit reports to the USEPA via CEDRI (CEDRI can be accessed through the USEPA's CDX). The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. (40 CFR 62.16724(j)(2))

6. The permittee shall submit any performance test reports and all other reports required by 40 CFR Part 62, Subpart OOO to the appropriate AQD District Office, in a format approved by the AQD District Supervisor. (R 336.1213(3)(c), R 336.2001(5))

Reports are reviewed when received. Reports were received in a timely manner. Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee must comply with all applicable provisions of the Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction on or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014 as specified in 40 CFR Part 62, Subpart OOO. Each permittee must comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961), for an MSW landfill with a gas collection and control system used to comply with the provisions of 40 CFR 62.16714 (b) and (c). Once the permittee begins to comply with the provisions of 40 CFR 63.1958, 40 CFR 63.1960 and 40 CFR 63.1961, the permittee must continue to operate the collection and control device according to those provisions and cannot return to the provisions of 40 CFR 62.16716, 40 CFR 62.16720 and 40 CFR 62.16722. (40 CFR 62.16716, 40 CFR 62.16720, 40 CFR 62.16722, 40 CFR Part 62, Subpart OOO)

FGOPENFLARE-AAAA

DESCRIPTION: Open (non-enclosed) flare is an open combustor without enclosure or shroud. This flexible group contains 40 CFR Part 63, Subpart AAAA requirements.

Emission Unit: EUOPENFLARE

POLLUTION CONTROL EQUIPMENT: Open (non-enclosed) flare

I. EMISSION LIMIT(S)

1. There must be no visible emissions from EUOPENFLARE except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. (40 CFR 63.11(b)(4))

Facility appears to be in compliance.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must operate EUOPENFLARE at all times when the collected gas is routed to it. (40 CFR 63.11(b)(3), 40 CFR 63.1958(f))

2. The flare must be operated with a flame present at all times. (40 CFR 63.11(b)(5))

3. In the event the control system is inoperable, the gas mover system must be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere must be closed within one hour. (40 CFR 63.1958(e)(1)(i))

4. In the event the control system is inoperable, efforts to repair the collection system must be initiated and completed in a manner such that downtime is kept to a minimum, and the collection and control system must be returned to operation. (40 CFR 63.1958(e)(1)(ii))

5. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a

manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.1955(c))

Facility appears to be in compliance.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee must design and operate EUOPENFLARE in accordance with the parameters established in 40 CFR 63.11(b). (40 CFR 63.1959(b)(2)(iii)(A))

2. The permittee must install, calibrate, maintain, and operate according to the manufacturer's specifications, a heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame. (40 CFR 63.11(b)(5), 40 CFR 63.1961(c)(1))

3. The permittee must install, calibrate, maintain, and operate according to the manufacturer's specifications, a device that records flow to or bypass of the flare (if applicable) at least every 15 minutes. (40 CFR 63.1961(c)(2))

Facility appears to be in compliance.

V. TESTING/SAMPLING

Records must be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee must verify visible emissions from EUOPENFLARE, by testing at owner's expense, in accordance with Department requirements. Testing must be performed using approved USEPA Method 22 listed in 40 CFR 60, Appendix A. No less than 30 days prior to testing, the permittee must submit a complete test plan to the AQD District Office. The AQD must approve the final plan prior to testing. The permittee must submit a complete report of the test results to the AQD District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 63.11(b)(4))

2. The permittee must verify the following:

a. The net heating value of the gas being combusted in the flare must be calculated and recorded using the equation provided in Appendix 7-1. (40 CFR 63.11(b)(6))

b. The exit velocity for steam-assisted, air-assisted, or non-assisted flares as determined by the methods provided in Appendix 7-1. (40 CFR 63.11(b)(7) and (8))

3. Within 180 days of permit reopening, the permittee must verify visible emissions, the net heating value, and exit velocity from EUOPENFLARE and at a minimum, every five years from the date of the last test, thereafter. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

4. The permittee must notify the AQD District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

Facility appears to be in compliance.

VI. MONITORING/RECORDKEEPING

Records must be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee must maintain records regarding the flare type (i.e., steam-assisted, air-assisted, or non-assisted), all visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations made during the performance test as specified in 40 CFR 63.11. (40 CFR 63.1983(b)(4))

2. The permittee must keep monthly records of the operating parameters specified to be monitored in 40 CFR 63.1961(c). The records must include:

a. Continuous records of the indication of flow and gas flow rate to the control device. (40 CFR 63.1983(b)(4))

b. The indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines. (40 CFR 63.1961(c)(2)(ii))

c. Continuous records of the open flare pilot flame or open flare flame monitoring, and records of all periods of operations during which the pilot flame of the flare flame is absent. (40 CFR 63.1983(b)(4))

Records maintained in a satisfactory manner. Facility appears to be in compliance.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

4. The permittee must submit to the appropriate AQD District Office semiannual reports for the control system. Reports must be received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. For flares, reportable exceedances are defined under 40 CFR 63.1961(c). The reports must include the following:

a. Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow. (40 CFR 63.1981(h)(2))

b. Description and duration of all periods when the control device was not operating and length of time the control device was not operating. (40 CFR 63.1981(h)(3))

5. The permittee must submit reports electronically according to the following:

a. Within 60 days after the date of completing each performance test required, submit the results of the performance test with data collected using test methods supported by the USEPA's Electronic Reporting Tool (ERT) as listed on the USEPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting->

tool-ert). Submit the results of the performance test to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the USEPA's CDX (<https://cdx.epa.gov/>). The data must be submitted in a file format generated through the use of the USEPA's ERT. Alternatively, submit an electronic file consistent with the extensible markup language (XML) schema listed on the USEPA's ERT website. (40 CFR 63.1981(l)(1)(i))

b. For data collected using test methods that are not supported by the USEPA's ERT as listed on the USEPA's ERT website, the results of the performance test must be included as an attachment in the ERT or an alternate electronic file consistent with the XML schema listed on the USEPA's ERT website. Submit the ERT generated package or alternative file to the USEPA via CEDRI. (40 CFR 63.1981(l)(1)(ii))

c. Each permittee must submit reports to the USEPA via CEDRI. CEDRI can be accessed through the USEPA's CDX. The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/chief>). Once the spreadsheet template upload/forms for the reports have been available in CEDRI for 90 days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. The semiannual reports should be electronically reported as a spreadsheet template upload/form to CEDRI. If the reporting forms specific to this subpart are not available in CEDRI at the time that the reports are due, the permittee must submit the reports to the USEPA at the appropriate address listed in 40 CFR 63.13. (40 CFR 63.1981(l)(2))

6. The permittee shall submit any performance test reports and all other reports required by 40 CFR Part 63, Subpart AAAA to the appropriate AQD District Office, in a format approved by the AQD District Supervisor. (R 336.1213(3)(c), R 336.2001(5))

Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee must comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as specified in 40 CFR Part 63, Subparts A and AAAA. (40 CFR Part 63, Subparts A and AAAA)

FGRULE290

DESCRIPTION: Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016: EUGWTS

POLLUTION CONTROL EQUIPMENT: NA

The facility currently only operates the groundwater treatment system under this permit exemption rule and haven't installed anything new using it. The groundwater treatment system is a tray type air stripper the facility installed many years ago. The system is still operating around the clock and consists of 30 pumping wells. The groundwater is pumped into the treatment building where it enters the top tray and continues to drop down through a number of trays as air is blown up through it from below. This treatment process tends to lower the pH and the landfill has to adjust the pH back to 7.4 to 7.5 using sulfuric acid to meet NPDES discharge requirements to the creek nearby. The facility is conducting monthly sampling of the influent and effluent for the appropriate contaminants that are required for their groundwater treatment system. VOC emissions trend to be less than 1 pound per month.

Facility appears to be in compliance.

FGCOLDCLEANERS

DESCRIPTION: Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EUCOLDCLEANERS

Pollution Control Equipment: NA

The cold cleaner is located in the maintenance garage and is not a heated unit. SDS sheet does not indicate solvent contained any of the listed halogenated compounds that were over 5% by weight. Unit is serviced by Safety Kleen as needed. Lid was closed during inspection.

Facility appears to be in compliance.

At time of inspection, Section 1 of ROP appears to be in compliance.

NAME DATE 8/8/24SUPERVISOR 

