



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

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COMMONWEALTH OF VIRGINIA Department of Environmental Quality Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

USA Waste of Virginia Landfills, Inc.
Bethel Landfill, Hampton, Virginia
Permit Number: TRO – 61291
AFS Id. Number: 51-650-00093

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, USA Waste of Virginia Landfills, Inc. has applied for a Title V Operating Permit for its Hampton facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Writer/Contact: _____
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Date: May 8, 2013

Regional Air Permits
Manager: _____
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Date: May 8, 2013

Regional Director: _____
Maria R. Nold

Date: May 8, 2013

FACILITY INFORMATION

Permittee

USA Waste of Virginia Landfills, Inc.
100 North Park Lane
Hampton, Virginia 23666

Facility

Bethel Landfill
100 North Park Lane
Hampton, Virginia 23666

Responsible Official

Mr. Harold S. Thacker
Delmarva Market Area Director of Landfill Operations
USA Waste of Virginia Landfills, Inc.

Facility Contact

Mr. Samuel Nicolai
Area Engineer
804-205-0414

County-Plant Identification Number: 51-650-00093

SOURCE DESCRIPTION

Overall Process Description

The main process occurring at the Bethel Landfill is the sanitary landfilling of non-hazardous solid waste. Landfill gas (LFG) is extracted and collected by an active gas collection and control system (GCCS) and sent to a landfill gas-to-energy plant. A utility (open flame) flare is available for supplemental control and back-up capacity. Each process is described in greater detail in the following sections.

Landfill

A sanitary landfill consists of an area of land which has been permitted under solid waste regulations for construction and to accept waste materials. Waste is hauled in trucks along paved and gravel roads. The truck traffic on these roads is a source of fugitive dust emissions. Waste acceptance occurs during the landfill's operating hours.

The trucks dispose of the refuse at the landfill's "active" face, the location of which can vary from day to day. The refuse is spread into lifts (or layers) and is subsequently compacted by landfill equipment. At the end of the day, soil or other approved alternative daily cover (ADC material) is spread over the waste to minimize odors and reduce the occurrence of vectors (flies, birds, etc.).

Complex microbial and biochemical reactions occur within the landfill's interior after the waste has been deposited for a period of time. Initial decomposition of the waste is rapid and continues until the entrained oxygen within the refuse is depleted. The second stage of refuse decomposition is anaerobic, and can be divided into two separate and independent processes: non-methanogenic and methanogenic. Carbon dioxide (CO₂) is a byproduct of the non-methanogenic process and methane (CH₄) is a byproduct of the methanogenic process. These two compounds are the primary

constituents of landfill gas; CO₂ content can range from 40% to 50% and CH₄ can range from 50% to 60%. The production of LFG is a continuous process. It begins months after the initial waste placement and continues until the microbial reactions are limited by substrate or moisture availability.

LFG production volumes are affected by the rate at which the solid waste is disposed in the landfill. Gas production volumes vary over the life of the landfill but generally increase from year to year until a peak volume is reached shortly after landfill closure. Other factors influencing production include climate (i.e., precipitation), overall moisture conditions within the landfill, types of solid waste accepted (degradable vs. inert), etc. The LFG picks up other minor constituents as it travels through the refuse. These include hydrogen sulfide, which can range from zero to several hundred ppm, and volatile organic compounds (VOC), which ranges from several hundred to several thousand ppm. Some of the VOC encountered in the landfill are classified as Hazardous Air Pollutants (HAPs).

LFG is collected or “captured” from the interior of the landfill by a series of vertical extraction wells which are embedded in the landfill at various depths. Some extraction devices can be in the form of horizontal extraction trenches. The extraction wells or trenches are connected to header pipes that send the LFG to the energy recovery equipment.

Landfill Gas to Energy Plant

The landfill gas-to-energy plant consists of six (6) Caterpillar G3516 engine-generator sets, each with a maximum power output of 1,148 bhp. Each spark-ignition (SI) reciprocating internal combustion engine (RICE) combusts approximately 330 cubic feet of LFG per minute. The plant combusts approximately 2.8 million cubic feet of LFG per day while producing 4.8 Megawatts of electrical power.

The Caterpillar G3516 engines are turbo-charged, after-cooled, and of ‘lean burn’ design. Each RICE is capable of consuming approximately 415,000 standard cubic feet of LFG per day, or 10.1 million Btu’s higher heating value (HHV) per hour. Each generator set produces approximately 800 kW of electrical power. The power is transformed and delivered to the local power grid.

LFG is extracted from the wellfield via a fuel gas compressor, which compresses the LFG up to the working pressure required by the engines. After the LFG has been compressed, it is cooled in an air-exchange cooler and filtered in a process filter in order to reduce the amount of water vapor present. After liquids and other impurities have been removed, the compressed LFG is reheated to above its dew point to prevent condensation in the piping or engine fuel systems.

The LFG is then delivered to the SI RICEs for use as fuel. The final “end product” in the process is the combustion of LFG along with the production of electrical power. The RICEs are operated in a continuous mode, with infrequent downtime for maintenance or repairs. By-products of combustion: (nitrogen oxides (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO), volatile organic compounds (VOCs), non-methane organic compounds (NMOC), and particulate matter PM₁₀, and PM_{2.5}) are directed through exhaust stacks (one per each engine). The stack height for each installation is 29.0 feet above grade, and the stack diameter is 10 inches.

An oil mist (particulates/VOC) is ducted from the crankcase of each RICE through a vent, called the crankcase breather vent. This is considered to be an insignificant emissions source.

Utility (Open Flame) Flare

A utility (open flame) flare is available to combust the LFG not otherwise utilized by the RICEs. The utility flare has a maximum design capacity of 3,400 scfm. The blower supplies the necessary pressure and momentum to supply LFG to the flare when it is operated. With the utility flare, the LFG is combusted at the tip of the flare stack.

Air emissions from the utility flare include those of NO_x, SO₂, CO, VOCs, NMOCs, hazardous air pollutants (HAPs), and PM₁₀/PM_{2.5}). The utility flare can be operated in a continuous mode, with infrequent downtime for blower maintenance, flame arrestor cleaning, etc.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility is not in violation of any state or federal applicable requirements at this time.

EMISSION UNITS AND CONTROL DEVICE IDENTIFICATION

EG1 to EG6	Six (6) Caterpillar Model G3516 engine-generator sets
P001A	Power Strategies Tornado (Parnell) Utility Flare
LFO-1	Landfill operations
GCCS-1	Gas Collection and Control System
F012	Stormwater pump
F003 to F009	Emergency generator sets of various kilowatt sizes
P004	280 gallon capacity gasoline storage tank

EMISSIONS INVENTORY

Actual emission estimates for 2011 were provided by USA Waste of Virginia Landfills, as part of the application for the Title V Operating permit renewal. Emission levels are expected to increase over time as the landfill grows the waste in place.

2011 Criteria Pollutant Emissions in Tons/Year							
Emission Unit	VOC	CO	SO ₂	PM ₁₀	PM _{2.5}	NO _x	TNMOC
Landfill Operations	9.6	---	---	8.0	4.8	---	24.1
Combustion Equipment	1.0	179.9	4.4	1.5	1.5	68.6	2.2
Totals	10.6	179.9	4.4	9.5	6.3	68.6	26.3

2011 Facility Wide Hazardous Air Pollutant Emissions	
Pollutant	2011 Hazardous Air Pollutant Emissions in Tons/Yr
Hydrogen Chloride	0.33
Hydrogen Fluoride	0.16
Total HAP Emissions	1.3

EMISSION UNIT APPLICABLE REQUIREMENTS – (emission units LFO-1, P001A, F012, and EG1 - EG6)

Limitations

The following limitations are derived from Conditions 5 - 19, 24, and 25 of the February 28, 2013 State Major NSR permit issued to USA Waste of Virginia Landfills.

- Condition 2: Control of NMOC emissions from the landfill.
- Condition 2: Control efficiency of the utility flare with respect to NMOC emissions.
- Condition 3: Fugitive dust emissions.
- Condition 9: Landfill operation is subject to NSPS, Subpart WWW.
- Condition 10: Flare heat content and maximum tip velocity specifications for the utility flare
- Condition 11: Establishes approved fuel for the six (6) Caterpillar G3516 RICEs.
- Condition 12: Limits the maximum throughput of treated LFG to the six (6) Caterpillar G3516 RICEs.
- Condition 13: Limits the maximum throughput of untreated LFG to the utility flare.
- Condition 14: Places emission limits on the six (6) Caterpillar LFG-fired RICEs.
- Condition 15: Places emission limits on the utility flare.
- Condition 16: Visible emission limits for the six (6) Caterpillar LFG-fired RICEs.
- Condition 17: Visible emission limits for the utility flare.
- Condition 52: Establishes approved fuels for the generator sets and stormwater pump RICEs.
- Condition 53: Places emission limits on the stormwater pump RICE.
- Condition 54: Visible emission limits for the emergency generators and stormwater pump RICEs.
- Condition 68: Sets the MACT Subpart CCCCC requirements for the gasoline storage tank.
- Condition 73: Sets the Facility wide emission limits.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

- 9 VAC 5-50-80 “New/Modified source standard for Visible Emissions” – units may not emit greater than 20% opacity except for one six-minute period in any one hour of not more than 30% opacity (reference 40 CFR 60, Appendix A. Method 9).
- 9 VAC 5-50-20 “Facility and Control Equipment Maintenance or Malfunction” – at all times, the facility, including associated air pollution control equipment, must be maintained and operated in a manner consistent with air pollution control practices for minimizing emissions.

Periodic Monitoring

Required monitoring has been derived from Conditions 9, 20, 21, 24, and 25 of the February 28, 2013 State Major NSR permit issued to USA Waste of Virginia Landfills.

- Condition 9: Requirement to measure and monitor the LFG flow.
- Condition 20: Monitoring of visible emissions from the LFG-fired RICEs
- Condition 21: Monitoring of visible emissions from the utility flare.
- Condition 24: Subpart WWW monitoring requirements; certification/operation/calibration.
- Condition 25: Monitoring for NSPS compliance.

The monitoring and recordkeeping requirements listed in this permit have been drafted to meet Part 70 requirements and those contained in the 40 CFR 60.756. The estimated emissions from this landfill operation were calculated from the ‘Landfill Gas Emission Model’, accumulated amount of waste in-place, the flow and analysis of the LFG and the default emission factors from the AP-42, Section 2.4. Assumptions and default values that were prominent in these calculations are as follows:

- Facility emissions are based on the assumption that any efficient LFG collection system has a maximum capture of 75% on the landfill.
- The VOC emissions assumed a default value equal to 39% of the generated NMOC content of the LFG flow that is calculated or found by stack testing results.

Testing

Because the six (6) Caterpillar engine-generator sets combust “treated” LFG, periodic emission testing of these RICEs has been deferred.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the annual consumption of treated LFG for the Caterpillar engine-generator sets EG1 through EG6 and untreated LFG for the utility flare P001A. The Title V permit requires recordkeeping be performed for LFG production, annual placement of refuse in the landfill volume, NSPS monitoring data, and operating hours for the stationary emergency generator sets.

Reporting

All reports required by the MSW Landfill NSPS, Subpart WWW (Section 60.755), the Landfill MACT, Subpart AAAA, and the NESHAPS, Subpart M shall be prepared and submitted to the DEQ Tidewater Regional Office in accordance with procedures outlined in the appropriate Federal regulation.

Streamlined Requirements

The permit was streamlined to remove the permit requirements contained in the amended February 28, 2013 State Major permit for the shutdown and removal of the enclosed flare P001 and the LPG-fired SI engine-generator set F001.

CHANGES TO THE TITLE V PERMIT

The emergency generator F001, powered by a 135 HP LPG-fired Waukesha engine and the LFG enclosed flare P001 have been removed from operation at the facility. As such, the Title V permit has been revised to reflect these changes by removing all applicable conditions and references to these two emission units, including the amendment of the facility wide emissions to account for the removed equipment items.

The emergency generator sets F003 through F009 and stormwater pump F012 were moved from the insignificant list to the list of significant emission units in the Title V permit. This was necessary due to the fact that the RICEs used by the emergency generator sets and stormwater pump must comply with the RICE MACT standards (40 CFR 63, Subpart ZZZZ) as well as the NSPS Subpart IIII applicable requirements for the stormwater pump RICE. In addition, the facility has also requested a change in operating status for the stormwater pump from that of emergency to unrestricted use (permitted at 8,760 hours/year).

The 280 gallon gasoline storage tank P004 was also moved from the insignificant list to the list of significant emission units in the Title V permit due to the storage tank’s applicability to 40 CFR 63, Subpart CCCCC.

A new section entitled Internal Combustion Engine Requirements for Emergency Generator Sets and Stormwater Pump - (emission unit ID# F003 - F007 and F012) was added to the Title V permit to include the applicable requirements and operating limitations for the “significant” emergency generator sets F003 through F009 and stormwater pump F012. This section included applicable NSPS, Subpart

III and MACT, Subpart ZZZZ requirements for the stationary RICEs used by the emergency generators and stormwater pump (emission units F003 - F007 and F012).

The frequency of periodic visual emission evaluations (VEE) on the utility flare (emission unit # P001A) and on the exhaust stack of each of the LFG-fired Caterpillar G3516 engine-generator sets EG1 through EG6 was changed from daily to once per calendar week.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upset, within one business day.

Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 3-2001".

This general condition cites the entire Article(s) that follow:

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Permits for Stationary Sources

This general condition cites the sections that follow:

- 9 VAC 5-80-80. "Application"
- 9 VAC 5-80-140. "Permit Shield"
- 9 VAC 5-80-150. "Action on Permit Applications"

Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emissions reporting within four (4) hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two (2) days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to this section including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both Sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four (4) daytime business hours of the malfunction.

In order for emission units to be relieved from the requirement to make a written report in 14 days, the emission units must have continuous monitors and the continuous monitors must meet the requirements of 9 VAC 5-50-410 or 9 VAC 5-40-41.

This general condition cites the sections that follow:

- 9 VAC 5-40-50. Notification, Records and Reporting
- 9 VAC 5-50-50. Notification, Records and Reporting
- 9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources

This general condition contains a citation from the Code of Federal Regulations as follows:

- 40 CFR 60.13 (h). Monitoring Requirements.

Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50	Applicability, Federal Operating Permit for Stationary Sources
9 VAC 5-80-190	Changes to Permits
9 VAC 5-80-260	Enforcement
9 VAC 5-80-1100	Applicability, Permits for New and Modified Stationary Sources
9 VAC 5-80-1790	Applicability, Permits for Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000	Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Failure/Malfunction Reporting

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in section 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation, see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-80-110.	Permit Content
9 VAC 5-20-180.	Facility and Control Equipment Maintenance or Malfunction

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70	Designated Emissions Standards
9 VAC 5-80-110	Permit Content.

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

- 9 VAC 5 Chapter 50, Part II, Article 2: Standards of Performance for Odorous Emissions (Rule 5-2)
- 9 VAC 5 Chapter 60, Part II, Article 5: Standards of Performance for Toxic Pollutants (Rule 6-5)

FUTURE APPLICABLE REQUIREMENTS

The facility has not identified any of these requirements in the application. There are no other pending requirements for landfills evident in the literature.

INAPPLICABLE REQUIREMENTS

The facility has identified inapplicable requirements as follows:

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart Kb	Volatile Organic Liquid Storage Vessels	The leachate storage tanks have vapor pressures less than the NSPS Kb specified threshold limits.
40 CFR 60, Subpart WWW	Landfill NSPS	Engines combusting "treated" LFG are not subject to the cited NSPS testing, monitoring, recording, and reporting requirements (six IC Caterpillar engine-generator sets).
40 CFR 60, Subparts Cb - VVV, and AAAA - MMMM.	Multiple NSPS	The source categories cited in these regulations do not exist at the facility.
40 CFR 61, Subparts B - L, Subparts N - Z, and Subparts AA - FF.	Multiple NESHAPS	The source categories cited in these regulations do not exist at the facility.
40 CFR 63, Subpart AAAA	Landfill MACT	Recordkeeping and reporting requirements of the Landfill MACT do not apply to combustion devices that use 'treated' landfill gas (the Caterpillar engines).
40 CFR 63, Subpart ZZZZ	RICE MACT	Stationary engines that combust LFG equivalent to ten percent or more of the gross heat inputs on an annual basis are not subject to the MACT (Caterpillar engines).
40 CFR 63, Subparts B - U, AA - ZZ, AAA - XXX, CCCC - YYYY, AAAAA - UUUUU, WWWWW - ZZZZZ, BBBBBB, DDDDDD - ZZZZZZ, AAAAAAA - HHHHHHH	Multiple MACTS	The source categories cited in these regulations do not exist at the facility.
40 CFR 64	Compliance Assurance Monitoring	The landfill is subject to an NSPS that was proposed after 11/15/1990. And therefore this regulation does not apply.
40 CFR 72	Acid Rain Regulations	The landfill gas to energy plant is not considered a "qualifying facility".

COMPLIANCE PLAN

The source does not have the requirement of a compliance plan.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
P003	Diesel Fuel Storage Tank	9 VAC 5-80-720 B	VOC	10,000 gallons
P006	Hydraulic Fluid Storage Tank	9 VAC 5-80-720 B	VOC	350 gallons
P007	Transmission Fluid Storage Tank	9 VAC 5-80-720 B	VOC	550 gallons
P009	Leachate Storage Tank	9 VAC 5-80-720 B	VOC	120,000 gallons
P010	Used Oil Tank	9 VAC 5-80-720 B	VOC	500 gallons
P011	Diesel Fuel Tank	9 VAC 5-80-720 B	VOC	550 gallons
P012	Motor Oil	9 VAC 5-80-720 B	VOC	350 gallons
P013	Transmission Oil	9 VAC 5-80-720 B	VOC	350 gallons
F010	Propane Comfort Heater	9 VAC 5-80-720 C	CO, VOC, NOx, SO ₂ PM ₁₀ and PM _{2.5}	0.016 MMBtu/hour
T1 – T6	Engine Oil Day Tanks	9 VAC 5-80-720B	VOC	25 gallons
T7	Engine Oil Tank	9 VAC 5-80-720B	VOC	1500 gallons
T8	Used Oil Tank	9 VAC 5-80-720B	VOC	1500 gallons
T9	Engine coolant (propylene glycol)	9 VAC 5-80-720B	VOC	750 gallons
CBV-1	Crankcase Breather Vent	9 VAC 5-80-720C	PM ₁₀ and PM _{2.5}	N/A

- ¹The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

MANDATORY GREENHOUSE GAS REPORTING

40 CFR Part 98 - Mandatory Reporting of Greenhouse Gases Rule: The provisions of the Final Rule for the Mandatory Reporting of Greenhouse Gases (GHG) (40 CFR Part 98) require owners and operators of general stationary fuel combustion sources that emit 25,000 metric tons (27,558 short tons) or more per year of CO₂ equivalent (CO₂e) in combined emissions from such units, to annually report GHG emissions directly to the EPA. The definition of "applicable requirement" in 40 CFR 70.2 and 71.2 does not include requirements such as those included in Part 98, promulgated under Clean Air Act (CAA) section 114(a)(1) and 208. Therefore, the requirements of 40 CFR Part 98 are not applicable under the Title V permitting program.

In accordance with 40 CFR Part 98.2 and Table A-1 of the GHG regulations, emissions reporting is required for landfills that generate equivalent carbon dioxide (CO₂e) in amounts of 25,000 metric tons (27,558 short tons) or more per year. According to the applicant, the landfill facility's CO₂e emissions for the year 2011 were 94,824.29 short tons/year, as calculated pursuant to the procedures in 40 CFR Part 98, Subpart HH for the landfill and 40 CFR, Part 98, Subpart C for the LFG-fired combustion sources. Based on these calculated CO₂e emissions, the Bethel Landfill facility is an affected source subject to the GHG emissions reporting requirements of 40 CFR Part 98. The reclassification of the stormwater pump from that of emergency to unrestricted use adds an additional 283.9 short tons (maximum) to the facility's calculated CO₂e emissions per year. As such, GHG emissions must be reported for the landfill,

As a result of several EPA actions regarding GHG under the CAA, emissions of GHG must be addressed for a Title V permit renewed after January 1, 2011. The facility has submitted its Mandatory GHG Report for the year 2011 to the EPA pursuant to 40 CFR Part 98. There have been no modifications to the landfill facility that would have resulted in the issuance of a PSD permit. Therefore, there are no applicable requirements for the facility specific to GHG.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Daily Press newspaper from Friday, March 22, 2013 to Monday, April 22, 2013.