



Registration #: 21547

Site Name: Region 2000 Regional Landfill-Livestock Rd Facilit

Address: 361 Livestock Rd, Rustburg, VA 24588 - 100

Contacts: Robert Arthur: (434) 455-6078

Clarke Gibson,: (434) 455-6079

Report #: 332885

CMS: N/A

Classification: True Minor

AIR INSPECTION REPORT

The purpose of this inspection report is to document DEQ's observations and provide the compliance status for requirements applicable to the facility. Presented below are the following:

- **Inspection Details** describe this inspection report
- **Compliance Summary** lists individual requirements addressed in the report
- **Inspection Summary** provides an overview of the inspector's observations
- **Inspection Checklist** provides additional details and individual observations related to specific requirements

Inspection Details

Inspection Date: Jun 24, 2021
Inspection Reason: Review Report Not Otherwise Classified
Reporting Period: 06/01/2020 - 05/31/2021
Inspector: James Puckett
Inspection Result: In Compliance
Description: Permit and Records Review for 2021 FCE

Program Code	Subpart
MACT	ZZZZ
NSPS	IIII, WWW, XXX
SIP	
TITLE V	

Approvals

James D. Puckett, Jr.

Margaret D. Wagner

Inspector: James Puckett
Signed Date: Jul 22, 2021

Supervisor: Margaret Wagner
Approved Date: Jul 22, 2021

Compliance Summary

In Compliance The applicable requirements listed in the table below were confirmed during the inspection to be in compliance.

Permit Effective Date or Regulation	Applicable Requirement
11/5/2018 TITLEV	00, 01, 02, 03, 04, 05, 06, 07, 08, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 34, 42, 43, 44, 45, 46, 47, 57, 58, 61, 62, 66, 67, 68

Inspection Summary

Purpose: The purpose of this off-site inspection was to go over the facility's permit and records to conduct a Partial Compliance Evaluation (PCE) with Region 2000 Regional Landfill - Livestock Rd. Facility, which took place on June 24, 2021. This inspection was conducted per the DEQ Air and Renewable Energy Compliance Inspection Protocol for COVID-19.

Facility and Process Description: Region 2000 Regional Landfill - Livestock Rd. Facility is located at 361 Livestock Rd. in Rustburg, VA. This facility is a municipal solid waste landfill operating with a 2,000 cfm utility flare, with a rated capacity 4,612,188 megagrams (Mg).

Permitting & Regulatory Standards: The facility currently operates under an NSR permit dated November 5, 2018, for a municipal solid waste landfill and a Title V permit dated November 5, 2018. This facility is also subject to NSPS WWW based on the rated capacity and NSPS WWW and NSPS XXX for the landfill gas collection and control system.

Compliance History: This is the first inspection conducted for this facility. There are no enforcement actions associated with this facility at this time.

Inspection Notes: This facility currently has approximately 21 employees and the facility is currently operating 5 days/week regular schedule with 1 shift and open on Saturdays for half a day. A phone inspection interview was conducted with Mr. Robert Arthur, Environmental Compliance/Safety Manager, on June 24, 2021, to go through the facility's current air permits and required records to be maintained. This meeting began at 1:30pm and ended at approximately 2:38pm. The facility maintains the permit and records electronically with documentation that support and demonstrate compliance with each permit condition. An onsite inspection will be conducted at a later date to visually observe visible emission requirements/permit conditions, as well as any other information that is needed to conduct a Full Compliance Evaluation (FCE). The conditions to be included in the onsite inspection are the following: 9, 11, 34 and 56.

Recommendations: It is recommended that the facility contact DEQ should any changes to the facility require an air permit modification.

Attachments: "21547 - Attachment 1 Email 1 of 10 PC 6"; "21547 - Attachment 2 Email 2 of 10 PC 6"; "21547 - Attachment 3 Email 3 of 10 PC 13"; "21547 - Attachment 4 Email 4 of 10 PC 13"; "21547 - Attachment 5 Email 5 of 10 PC 13"; "21547 - Attachment 6 Email 6 of 10 PC 5 6 15 and 32"; "21547 - Attachment 7 Email 7 of 10 PC 13 and 15"; "21547 - Attachment 8 Email 8 of 10 PC 15"; "21547 - Attachment 9 Email 9 of 10 PC 15" and "21547 - Attachment 10 Email 10 of 10 PC 15"

- 1 - Email 1 of 10 PC 6
- 2 - Email 2 of 10 PC 6
- 3 - Email 3 of 10 PC 13
- 4 - Email 4 of 10 PC 13

- 5 - Email 5 of 10 PC 13
- 6 - Email 6 of 10 PC 5 6 15 and 32
- 7 - Email 7 of 10 PC13 and 15
- 8 - Email 8 of 10 PC 15
- 9 - Email 9 of 10 PC 4 and 15
- 10 - Email 10 of 10 PC 15

Inspection Checklist

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 00

Compliance Status: In Compliance

Applicable Requirement

Emission Units

Equipment to be operated consists of:

Emission Unit ID

Stack ID

Emission Unit Description

Size/Rated Capacity*

Pollution Control Device (PCD) Description

PCD ID

Pollutant Controlled

Applicable Permit Date

Landfill:

P01

NA

Municipal Solid Waste Landfill Area and Gas Collection and Control System

4,612,188 Mg (5,114,898 m3) >2.5 x 106 Mg and >2.5 x 106 m3

Five (5) – Solar Spark utility flares; One (1) PEI utility flare

PCD-1; PCD-2

NMOC, VOC

11/5/2018

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

Observation

It was noted that there have been no changes in equipment since the issuance of this permit.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 01

Compliance Status: In Compliance

Applicable Requirement

LANDFILL REQUIREMENTS (Emission Unit-P01)

Limitations

1. Landfill Requirements - Limitations - The design capacity of the MSW landfill shall not exceed 4,612,188 Mg (5,114,898 cubic meters). A change in the design capacity may require a permit to construct and operate. (9VAC5-80-110 and Condition 1 of the 02/26/2016 Permit)

Observation

It was noted that there have been no changes in design capacity.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 02

Compliance Status: In Compliance

Applicable Requirement

2. Landfill Requirements – Emission Controls – VOC emissions from the landfill shall be controlled by the PEI utility flare (PCD-2). The flare shall be provided with adequate access for inspection and shall be in operation when the gas collection system is operating.

(9VAC5-80-110 and Condition 2 of the 11/5/2018 Permit)

Observation

It was noted that VOC emissions are controlled by a PEI utility flare (PCD-2).

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 03

Compliance Status: In Compliance

Applicable Requirement

3. Landfill Requirements – LFG Collection and Control System - If the calculated non-methane organic compounds (NMOC) emission rate is greater than or equal to 34 Mg (as calculated in 40 CFR 60.764 (a)(1)), the permittee shall comply with subsection a. or subsections b., c., and d. of this condition:

- a. demonstrate and report that the NMOC emission rate is less than 34 Mg per year either through Tier 2 testing in accordance with 40 CFR 60.764(a)(3), or Tier 3 testing in accordance with 40 CFR 60.764(a)(4), or Tier 4 testing in accordance with 40 CFR 60.764(a)(6); or
- b. submit a landfill gas (LFG) collection and control system design plan meeting the requirements of 40 CFR 60.767(b)(2)(i) to the Blue Ridge Regional Office within one year, and
- c. install a gas collection and control system (GCCS) in compliance with 40 CFR 60.762 (b)(2)(ii)(C) or (D), and 40 CFR 60.762(b)(2)(iii) within 30 months after the first annual report in which the NMOC emission rate is greater than or equal to 34 Mg per year and
- d. operate the installed gas collection and control device in compliance with 40 CFR 60.762(b)(2)(iv), or
(9VAC 5-80-110, 40 CFR 60.752(b)(2), 40 CFR 60.757(c), 40 CFR 60.762(b)(2), 40 CFR 60.767(c) and Condition 3 of the 11/5/2018 Permit)

Observation

It was noted that the facility has not calculated the non-methane organic compound (NMOC) rate to be greater than 34 Mg. No LFG System has been installed to date. The facility submitted a Tier 2 emission rate report on December 7, 2016, in compliance with NSPS WWW. The NMOC emission rate was 13.4 Mg. If no deviations from the projected waste acceptance rates or modifications to the facility occur, the source is required to perform and submit the next NMOC emission rate report in 5 years, which is due by December 6, 2021.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 04 **Compliance Status:** In Compliance

Applicable Requirement

4. Landfill Requirements - Open Flare – The PEI utility flare (PCD-2) shall be designed and operated as follows:

- a. Net heating value for the landfill gas being combusted shall be 200 Btu/scf or greater and determined according to methods listed in 40 CFR 60.18 (f)(3) or other methods approved by EPA, Region III.
- b. Exit velocity shall be less than 60 ft/s except when the net heating value for the landfill gas is greater than 1,000 Btu/scf. The exit velocity shall be determined using the applicable methods listed in 40 CFR 60.18(f)(4) and 40 CFR 60.18(f)(5) or methods approved by EPA, Region III.
- c. Designed and operated to reduce VOC by 98%, NMOC by 99%.
- d. Equipped with a heat sensing device to indicate the continuous presence of a flame.
- e. Equipped with a gas flow meter, calibrated and maintained to record the landfill gas flow to the flare at minimum every 15 minutes.

(9VAC5-80-110 and Condition 4 of the 11/5/2018 Permit)

Observation

It was noted that the flare is designed and operated, as outlined in this condition.

(See Attachment 9 - Email 9 of 10)

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 05 **Compliance Status:** In Compliance

Applicable Requirement

5. Landfill Requirements - Limitations - The landfill shall accept no more than 301,840 tons (274,400 Mg) of solid waste per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total of the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

(9VAC5-80-110, 9VAC5-80-1180, and Condition 7 of the 09/14/2011 Permit)

Observation

Source records indicated 218,723.18 tons of solid waste accepted during the last 12 month period.

(See Attachment 6 - Email 6 of 10)

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 06

Compliance Status: In Compliance

Applicable Requirement

6. Landfill Requirements – Limitations – Emissions from the PEI utility flare (PCD-2) shall be controlled by proper operation and maintenance. The operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at a minimum. The permittee shall maintain records of the required training including a statement of time, place and nature of training provided. The permittee shall have available good written operating procedures and a maintenance schedule for the utility flare. These procedures shall be based on the manufacturer's recommendations, at a minimum. All records required by this condition shall be kept on site and made available for inspection by the DEQ.

(9VAC5-80-110 and Condition 8 of the 11/5/2018 Permit)

Observation

Source contact provided training records, operating procedures and maintenance records, as outlined, to demonstrate compliance with this condition.

(See Attachment 1 - Email 1 of 10, Attachment 2 - Email 2 of 10 and Attachment 6 - Email 6 of 10)

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 07

Compliance Status: In Compliance

Applicable Requirement

7. Landfill Requirements – Limitations (Fuel) – The approved fuel for the PEI utility flare (PCD-2) is landfill gas (LFG). The flare may also use propane gas to ignite the pilot flame. A change in fuel may require a permit to modify and operate.

(9VAC5-80-110 and Condition 9 of the 11/5/2018 Permit)

Observation

It was noted that the flare uses landfill gas (LFG). Propane is used when needed to light the flare.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 08

Compliance Status: In Compliance

Applicable Requirement

8. Landfill Requirements – Limitations (Emissions) - If a GCCS is required by Condition 3, or a landfill gas collection and control system is installed, emissions from the operation of the control device shall not exceed the limits specified below:

PM-10

0.017 lb/MMBtu

4.3 ton/yr

PM-2.5

0.017 lb/MMBtu

4.3 ton/yr

Nitrogen Oxides (as NO₂)

0.068 lb/MMBtu

17.1 ton/yr

Carbon Monoxide

0.31 lb/MMBtu

78.2 ton/yr

Volatile Organic Compounds (as propane)

0.128 lb/MMBtu

32.4 ton/yr

(9VAC5-80-110 and Condition 10 of the 11/5/2018 Permit)

Observation

It was noted that a GCCS or a landfill gas collection and control system has not been installed to date.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 10

Compliance Status: In Compliance

Applicable Requirement

10. Landfill Requirements – Visible Emission Limitations – If a GCCS is required by Condition 3, each control device shall be operated with no visible emissions, as determined by EPA Method 22 (reference 40 CFR 60, Appendix A), except for periods not to exceed five minutes during two consecutive hours. This condition applies at all times except during startup, shutdown and malfunction.

(9VAC5-80-110 and Condition 11 of the 09/14/2011 Permit)

Observation

It was noted that a GCCS is not required at this time.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 12 **Compliance Status:** In Compliance

Applicable Requirement

12. Landfill Requirements – Limitations - If a GCCS is required by Condition 3, at all times, including periods of start-up, shutdown, and malfunction, the permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-schedule maintenance;
- b. Maintain an inventory of spare parts;

(9VAC5-80-110 and 40 CFR 60.763(e))

Observation

It was noted that a GCCS is not required at this time.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 13 **Compliance Status:** In Compliance

Applicable Requirement

Monitoring and Recordkeeping

13. Landfill Requirements – Monitoring - At least one time in any week the flares (PCD-1 and PCD-2) operate, an observation of the presence of visible emissions from the operating flare(s) shall be made in accordance with EPA Method 22. The presence of visible emissions shall require the permittee to take timely corrective action such that the flare resumes operation with no visible emissions.

a. An initial visible emission evaluation (VEE), in accordance with EPA Method 22 (reference 40 CFR 60, Appendix A) shall be conducted on the PEI utility flare (PCD-2). Each observation period shall be 2 hours. The details of the tests are to be arranged with the Blue Ridge Regional Office. The permitted shall submit a test protocol at least 30 days prior to testing. The evaluation shall be performed within 60 days after achieving the maximum production rate at which the open flare will be operated but not later than 180 days after initial startup of the PEI utility flare (PCD-2). Should conditions prevent observations, the Blue Ridge Regional Office shall be notified in writing, within 7 days and visible emissions testing shall be rescheduled within 30 days. Rescheduled testing shall be conducted under the same conditions (as possible) as the initial performance test. Two copies of the test result shall be submitted to the Blue Ridge Regional Office within 60 days after test completion and shall conform to the test report format enclosed with this permit.

b. The permittee shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the flare(s) has not been operated for any period during the week, it shall be noted in the log book.

(9VAC5-50-30, 9VAC5-80-110, 9VAC5-80-1180 and Condition 15 of the 11/5/2018 Permit)

Observation

Source provided records, as outlined, to demonstrate compliance with this condition. A recommendation was made to make sure that all check boxes are checked on the form used for the observations. A suggestion was also made to have an annual refresher on the requirements of the air permit and filling out the observation forms in their entirety.

(See Attachment 3 - Email 3 of 10; Attachment 4 - Email 4 of 10; Attachment 5 - Email 5 of 10 and Attachment 7 - Email 7 of 10)

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 14 **Compliance Status:** In Compliance

Applicable Requirement

14. Landfill Requirements – Monitoring – The permittee shall use either Equation 1 or Equation 2 in 40 CFR 60.764 (a)(1)(i) and 40 CFR 60.764 (a)(1) (ii) to calculate the NMOC emission rate. The default values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for LO, and 4000 parts per million by volume as hexane for CNMOC. If obtained, the site-specific value for CNMOC, as determined by using the procedure specified in Condition 18, and/or the site-specific value for k, as determined by using the procedure specified in Condition 19, shall be used in lieu of the default value for CNMOC and/or k in calculating the NMOC emission rate.

(9VAC5-80-110, 40 CFR 60.754(a)(1)(i), (ii) and 40 CFR 60.764(a)(1)(i), (ii))

Observation

It was noted that the facility has used the appropriate equation to calculate the NMOC rate.

Effective Date: Nov 5, 2018

Applicable Requirement #: 15

Compliance Status: In Compliance

Applicable Requirement

15. Landfill Requirements – Recordkeeping - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:

- a. Current maximum design capacity report, current amount of waste in place, and monthly acceptance rates.
- b. Records sufficient to calculate the facility's emissions on a 12-month rolling basis.
- c. Description, location, amount, and placement date of all nondegradable refuse including asbestos and demolition refuse placed in landfill areas which are excluded from landfill gas estimation or landfill gas collection and control.
- d. If a GCCS is required by Condition 3, all records required in 40 CFR 60.768 (b), (c), (d) and (e), where records pertain to specific control device type, only the records required for the facility's installed control device type shall be kept.
- e. Documentation to indicate the type of flare used to control LFG (PCD-2).
- f. Results of visible emission evaluation(s) for the PEI utility flare (PCD-2).
- g. Written operating procedures, scheduled and unscheduled maintenance, and operator training for the PEI utility flare (PCD-2) system.
- h. Documentation of the PEI utility flare's (PCD-2) exit velocity in feet per second.
- i. Records to indicate the presence of the PEI utility flare (PCD-2) flame.
- j. Monitoring records of the flare to ensure that it is operated and maintained in conformance with its design.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years unless a longer period is required in 40 CFR 60.768.

(9VAC5-80-110, 40 CFR 60.758, 40 CFR 60.768 and Condition 17 of the 11/5/2018 Permit)

Observation

Source provided records, as outlined, to demonstrate compliance with this condition.

It shall be noted that the facility uses landfill compactors and D6 track equipment with GPS location equipment. The GPS systems record data everywhere these vehicles drive across the landfill. The GPS points are provided in 2 different formats, as an AutoCAD DXF file of points and as a CSV of ASCII PNEZD data, which can be imported into any CAD software program. The points are in the coordinate system used by the landfill (Virginia South State Plane coordinates), and not latitude and longitude. The landfill can request the location of daily filling operations from GeoLogic Computer Systems, as needed or required. The facility provided an example of the information GeoLogic Computer Systems can provide upon request, as an example. The data was from June 18, 2021.

(See Attachment 1 - Email 1 of 10; Attachment 6 - Email 6 of 10; Attachment 8 - Email 8 of 10; Attachment 9 - Email 9 of 10 and Attachment 10 - Email 10 of 10)

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 16 **Compliance Status:** In Compliance

Applicable Requirement

Testing

16. Landfill – Stack Test – If a GCCS is required by Condition 3, the initial performance tests shall be conducted as required in 40 CFR 60.762(b)(2)(iii) to determine compliance with the applicable requirements. Tests shall be conducted and reported and data reduced as set forth in 9VAC5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9VAC5-50-410. The details of the tests are to be arranged with the Blue Ridge Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. The test report shall be submitted as required in Condition 23 and shall conform to the test report format enclosed with the 11/5/2018, minor NSR permit.

(9VAC5-80-110, 40 CFR 60.752(b)(2)(iii), 40 CFR 60.762 (b)(2)(iii) and Condition 14 of the 11/5/2018 Permit)

Observation

It was noted that a GCCS is not required at this time.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 17 **Compliance Status:** In Compliance

Applicable Requirement

17. Landfill - Testing - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

(9VAC5-50-30 and 9VAC5-80-110)

Observation

It was noted that the facility is constructed to allow for emissions testing.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 18 **Compliance Status:** In Compliance

Applicable Requirement

18. Landfill – Testing – When determining the Tier 2 site-specific NMOC concentration, the permittee shall use sampling procedure as identified in 40 CFR 60.764. One copy of the test results shall be submitted to the DEQ within 45 days after test completion.

(9VAC5-80-110, 40 CFR 60.754(a)(3), and 40 CFR 60.764(a)(3))

Observation

It was noted that the facility has used the appropriate sampling procedures, as outlined, to demonstrate compliance with this condition.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 19 **Compliance Status:** In Compliance

Applicable Requirement

19. Landfill – Testing –When determining the Tier 3 site-specific methane generation rate constant, the permittee shall use the procedure provided in 40 CFR Part 60, Appendix A, Method 2E. The permittee shall submit a test protocol at least 30 days prior to testing. One copy of the test results shall be submitted to the DEQ within 45 days after test completion.

(9VAC5-80-110, 40 CFR 60.754(a)(4) and 40 CFR 60.764(a)(4))

Observation

It was noted that the facility has not performed any Tier 3 testing, to date.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 20 **Compliance Status:** In Compliance

Applicable Requirement

20. Landfill – Testing – When determining Tier 4 surface emission monitoring to calculate methane emissions, the permittee must first demonstrate NMOC emissions are greater than or equal to 34 Mg/yr but less than 50 Mg/yr (using Tier 1 or Tier 2), else Tier 4 testing cannot be used.

(9VAC-80-110 and 40 CFR 60.764(a)(6))

Observation

It was noted that the facility has not performed any Tier 4 testing, to date.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 21 **Compliance Status:** In Compliance

Applicable Requirement

Notifications and Reports

21. Landfill – Notifications – The permittee shall furnish written notification to the Blue Ridge Regional Office of:

a. In accordance with Condition 3.a, the anticipated date of testing under Tiers 2, 3 or 4 to demonstrate the NMOC emission rate of the landfill postmarked at least 30 days prior to such date.

b. If a GCCS is required by Condition 3, the anticipated date of performance tests of the gas collection and control system, postmarked at least 30 days prior to such date.

Copies of the written notifications in this condition are to be sent to the EPA at the address contained in Condition 22. (9VAC5-50-50, 9VAC5-80-110, 40 CFR 60.8(d) and Condition 23 of the 11/5/2018 Permit)

Observation

It was noted that the facility has submitted the appropriate notifications, as outlined, to demonstrate compliance with this condition.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 22

Compliance Status: **In Compliance**

Applicable Requirement

22. Landfill –NMOC Emissions Report – Except as provided for in 40 CFR 60.767 (b)(1)(ii) and 40 CFR 60.767(b)(3), the permittee shall submit an NMOC emission rate report initially and annually to the Blue Ridge Regional Office no later than one year from the date of the initial NMOC report. The report shall meet the requirements of 40 CFR 60.767(b). One copy of the NMOC emission report shall be submitted to the U.S. Environmental Protection Agency at the following address:

Associate Director
Office of Air Enforcement and Compliance Assistance (3AP20)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9VAC5-80-110, 40 CFR 60.757(b) and (c), 40 CFR 60.767 (b) and (c), 40 CFR 60.4, and Condition 23 of the 11/5/2018 Permit)

Observation

It was noted that the facility has not calculated the non-methane organic compound (NMOC) rate to be greater than 34 Mg. No LFG System has been installed to date. The facility submitted a Tier 2 emission rate report on December 7, 2016, in compliance with NSPS WWW. The NMOC emission rate was 13.4 Mg/hr. If no deviations from the projected waste acceptance rates or modifications to the facility occur, the source is required to perform and submit the next NMOC emission rate report in 5 years, which is due by December 6, 2021.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 23

Compliance Status: **In Compliance**

Applicable Requirement

23. Landfill – Annual Compliance Report – Within 180 days of start-up of an active collection system used to comply with Condition 3, the permittee shall submit to the Blue Ridge Regional Office the initial semi-annual compliance report of the collection and control system. The report shall contain the following:

- a. The initial performance test report required under 40 CFR 60.762(b)(2)(iii)(B) and 40 CFR 60.8 including the information required in 40 CFR 60.767 (g);
- b. Value and length of time for exceedance of applicable parameters monitored under 40 CFR 60.766 (a), (b), (c) and (d);
- c. 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 as specified under 40 CFR 60.766;
- d. Description and duration of all periods when the control device was not working for a period exceeding one hour and the length of time control device was not operating;
- e. All periods when the collection system was not operating in excess of five days;
- f. The location of each exceedance of the 500 parts per million surface methane concentration as provided in 40 CFR 60.763(d) and the concentration recorded at each location for which an exceedance was recorded in the previous month; and

g. The date of installation and the location of each well or collection system expansion added pursuant to 40 CFR 60.765(a)(3), 40 CFR 60.765(b) and 40 CFR 60.765(c)(4).

Items (b) through (f) shall be submitted semi-annually. All future semi-annual reports shall be submitted no later than March 1 and September 1 of each calendar year and shall cover the period of either January 1 to June 30 or July 1 to December 31. One copy of each semi-annual compliance report shall be submitted to the U.S. Environmental Protection Agency at the address specified in Condition 22.

(9VAC5-80-110, 40 CFR 60.757(f), 40 CFR 60.767(g) and Condition 19 of the 11/5/2018 Permit)

Observation

It was noted that the facility has not calculated the non-methane organic compound (NMOC) rate to be greater than 34 Mg. No LFG System has been installed to date. The facility submitted a Tier 2 emission rate report on December 7, 2016, in compliance with NSPS WWW. The NMOC emission rate was 13.4 Mg. If no deviations from the projected waste acceptance rates or modifications to the facility occur, the source is required to perform and submit the next NMOC emission rate report in 5 years, which is due by December 6, 2021.

Effective Date: Nov 5, 2018

Applicable Requirement #: 24

Compliance Status: In Compliance

Applicable Requirement

24. Landfill – Reporting – No later than April 15 of each year, the permittee must submit an annual NMOC emission rate report to the DEQ. The NMOC emission rate shall be calculated in accordance with the methodology contained in Condition 14. The report shall include all data, calculations, sample reports and measurements used to estimate the emissions. If the estimated NMOC emission rate as reported in the annual report is less than 34 megagrams per year in each of the next five consecutive years, the permittee may elect to submit an estimate of the NMOC emission rate for the next five year period in lieu of the annual report. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the five years for which an NMOC emission rate is estimated. This estimate shall be revised at least once every five years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the five year estimate, a revised five year estimate shall be submitted. The revised estimate shall cover the five year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate.

(9VAC5-80-110, 40 CFR 60.757 (b), 40 CFR 60.767 (b), and Condition 18 of the 11/5/2018 Permit)

Observation

It was noted that the facility has not calculated the non-methane organic compound (NMOC) rate to be greater than 34 Mg. No LFG System has been installed to date. The facility submitted a Tier 2 emission rate report on December 7, 2016, in compliance with NSPS WWW. The NMOC emission rate was 13.4 Mg/hr. If no deviations from the projected waste acceptance rates or modifications to the facility occur, the source is required to perform and submit the next NMOC emission rate report in 5 years, which is due by December 6, 2021.

Effective Date: Nov 5, 2018

Applicable Requirement #: 25

Compliance Status: In Compliance

Applicable Requirement

25. Landfill – Reporting – If the reported NMOC emission rate, in the annual report, is equal to or exceeds 34 megagrams per year, the permittee shall:

- a. Submit a LFG collection and control system design plan as per 40 CFR 60.762(b)(2); or
- b. Within 180 days of the emission rate report in Condition 18, demonstrate, using a site-specific NMOC concentration (Tier 2), that NMOC emissions do not equal or exceed 34 megagrams per year, submit a revised NMOC emission rate report, resume annual NMOC emission rate reporting, and retest the site-specific NMOC concentration every five years.

(9VAC5-80-110, 40 CFR 60.752 (b)(2), 40 CFR 60.757 (c), 40 CFR 60.762 (b)(2), and 40 CFR 60.767 (c)(4)(i))

Observation

It was noted that the facility has not calculated the non-methane organic compound (NMOC) rate to be greater than 34 Mg. No LFG System has been installed to date. The facility submitted a Tier 2 emission rate report on December 7, 2016, in compliance with NSPS WWW. The NMOC emission rate was 13.4 Mg/hr. If no deviations from the projected waste acceptance rates or modifications to the facility occur, the source is required to perform and submit the next NMOC emission rate report in 5 years, which is due by December 6, 2021.

Effective Date: Nov 5, 2018

Applicable Requirement #: 26

Compliance Status: In Compliance

Applicable Requirement

26. Landfill – Reporting (Tier 2) - If, using a site-specific NMOC concentration, the NMOC emission rate is equal to or exceeds 34 megagrams per year, the permittee shall:

- a. Submit an LFG collection and control system design plan as per 40 CFR 60.762(b)(2); or
- b. Within one year of the emission rate report required by Condition 19, demonstrate using a site-specific methane generation constant (Tier 3), that NMOC emissions do not equal or exceed 34 megagrams per year, submit a revised NMOC emission rate report and resume annual NMOC emission rate reporting.

(9 VAC 5-80-110, 40 CFR 60.752 (b)(2), 40 CFR 60.757 (c), 40 CFR 60.762 (b)(2), and 40 CFR 60.767 (c)(4)(ii))

Observation

It was noted that the facility has not calculated the non-methane organic compound (NMOC) rate to be greater than 34 Mg. No LFG System has been installed to date. The facility submitted a Tier 2 emission rate report on December 7, 2016, in compliance with NSPS WWW. The NMOC emission rate was 13.4 Mg/hr. If no deviations from the projected waste acceptance rates or modifications to the facility occur, the source is required to perform and submit the next NMOC emission rate report in 5 years, which is due by December 6, 2021.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 27 **Compliance Status:** In Compliance

Applicable Requirement

27. Landfill – Reporting (Tier 2, Tier 3) - If the NMOC mass emission rate as calculated using the Tier 2 site-specific NMOC concentration and Tier 3 site-specific methane generation rate is equal to or greater than 34 megagrams per year, the permittee shall:

- a. Submit a gas collection and control system design plan within 1 year as specified in 40 CFR 60.767(c) and install and operate a gas collection and control system within 30 months according to §60.762(b)(2)(ii) and (iii);
- or
- b. Conduct a surface emission monitoring demonstration using the Tier 4 procedure specified in Condition 20.

(9 VAC 5-80-110 and 40 CFR 60.764 (a)(4)(i))

Observation

It was noted that the facility has not calculated the non-methane organic compound (NMOC) rate to be greater than 34 Mg. No LFG System has been installed to date. The facility submitted a Tier 2 emission rate report on December 7, 2016, in compliance with NSPS WWW. The NMOC emission rate was 13.4 Mg/hr. If no deviations from the projected waste acceptance rates or modifications to the facility occur, the source is required to perform and submit the next NMOC emission rate report in 5 years, which is due by December 6, 2021.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 28 **Compliance Status:** In Compliance

Applicable Requirement

28. Landfill – Reporting (Tier 4) – If the permittee elects to conduct Tier 4 monitoring, the Tier 4 reports shall be submitted according to the requirements of 40 CFR 60.767(c)(4)(iii).

(9 VAC 5-80-110 and 40 CFR 60.767(c)(4)(iii))

Observation

It was noted that the facility has not performed any Tier 4 testing, to date.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 29 **Compliance Status:** In Compliance

Applicable Requirement

29. Landfill – Closure Report – Within 30 days of the date the MSW landfill stops accepting waste, the permittee shall submit a closure report to the Blue Ridge Regional Office and comply with 40 CFR 60.767(e). One copy of the closure report shall be submitted to the U.S. Environmental Protection Agency at the address specified in Condition 22.

(9VAC5-80-110, 40 CFR 40-60.757(d), 40 CFR 40-60.767(e), and Condition 20 of the 11/5/2018 Permit)

Observation

It was noted that the facility is in continuous operation at this time.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 30 **Compliance Status:** In Compliance

Applicable Requirement

30. Landfill – Control Equipment Removal Report – If a GCCS is required by Condition 3, no later than 30 days prior to cessation of operation or removal of control equipment used to comply with 40 CFR Part 60 Subpart XXX, the permittee shall submit an equipment removal report to the Blue Ridge Regional Office in accordance with 40 CFR 60.767(e). One

copy of the equipment removal report shall be submitted to the U.S. Environmental Protection Agency at the address specified in Condition 22.

(9VAC5-80-110, 40 CFR 60.757(e), 40 CFR 60.767(f) and Conditions 21, 22 of the 11/5/2018 Permit)

Observation

It was noted that a GCCS is not required at this time.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 31

Compliance Status: **In Compliance**

Applicable Requirement

31. Landfill – Report (Tier 4) - The permittee shall provide a notification of the date(s) upon which it intends to demonstrate site-specific surface methane emissions are below 500 parts per million methane, based on the Tier 4 provisions of 40 CFR 60.764(a)(6). The landfill must also include a description of the wind barrier to be used during the surface emissions monitoring in the notification. Notifications must be postmarked not less than 30 days prior to such date.

(9VAC5-80-110 and 40 CFR 60.767(l)(1))

Observation

It was noted that the facility has not performed any Tier 4 testing, to date.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 32

Compliance Status: **In Compliance**

Applicable Requirement

Insignificant Emission Units

32. Insignificant Emission Units - The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.

Emission Unit Description

Citation

Pollutant Emitted (9VAC5-80-720 B)

Rated Capacity (9VAC5-80-720 C)

N01

Leachate Storage Tank (246,000 gal)

VOC

A20

Clean Burn Inc., CB-2501 Reused Waste Oil Furnace

9 VAC 5-80-720 A

P6

Groundwater Remediation System w/ QED Model EZ tray 2.4SS air stripper w/ 15hp New York blower

VOC

These emission units are presumed to be in compliance with all requirements of the federal 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 9VAC5-80-110.

(9VAC5-80-110)

Observation

It was noted that the Campbell County Ground Water Remediation System w/ QED Model EZ tray 2.4SS air stripper w/ 15hp New York blower (P6) is no longer in use. Collected Ground water is discharged into the CCUSA sanitary sewer system and sent to the City of Lynchburg Waste Water Treatment Facility for treatment.

(Attachment 6 - Email 6 of 10)

Applicable Requirement

General Conditions

34. General Conditions – Maintenance/Operating Procedures – At all times including periods of start-up, shutdown and maintenance, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. (9VAC 5-80-110 and Condition 26 of the 11/5/2018 Permit)

Observation

It was noted that the facility maintains and operates the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. This condition will also be observed during the onsite inspection.

Applicable Requirement

42. General Conditions - Recordkeeping and Reporting - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and.
- f. The operating conditions existing at the time of sampling or measurement.

(9VAC5-80-110)

Observation

It was noted that the facility includes the appropriate information, as outlined, for all required records and reports.

Applicable Requirement

43. General Conditions - Recordkeeping and Reporting - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9VAC5-80-110)

Observation

It was noted that the facility maintains the required records, as outlined in this condition.

Applicable Requirement

44. General Conditions - Recordkeeping and Reporting - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - i. Exceedance of emissions limitations or operational restrictions;
 - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring,

periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or

iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9VAC5-80-110)

Observation

It was noted that the facility submits the required semi-annual monitoring report in a timely manner.

Effective Date: Nov 5, 2018

Applicable Requirement #: 45

Compliance Status: In Compliance

Applicable Requirement

45. General Conditions - Annual Compliance Certification - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address: R3_APD_Permits@epa.gov

(9VAC5-80-110)

Observation

It was noted that the facility has submitted the required ACC in a timely manner.

Effective Date: Nov 5, 2018

Applicable Requirement #: 46

Compliance Status: In Compliance

Applicable Requirement

46. General Conditions - Permit Deviation Reporting - The permittee shall notify the Blue Ridge Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 44 of this permit.

(9VAC5-80-110)

Observation

The facility contact stated that there have been no permit deviations during the last 12 month period.

Effective Date: Nov 5, 2018

Applicable Requirement #: 47

Compliance Status: In Compliance

Applicable Requirement

47. General Conditions - Failure/Malfunction Reporting - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Blue Ridge Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9VAC5-40-50 C and 9VAC5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9VAC5-40-40 and 9VAC5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Blue Ridge Regional Office.
(9VAC5-80-110, 9VAC 5-20-180 and Condition 28 of the 11/5/2018 Permit)

Observation

The facility contact stated that there have been no malfunctions during the last 12 month period.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 57 **Compliance Status:** In Compliance

Applicable Requirement

57. General Conditions - Startup, Shutdown, and Malfunction - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9VAC5-80-110)

Observation

The facility contact stated that there have been no malfunctions during the last 12 month period.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 58 **Compliance Status:** In Compliance

Applicable Requirement

58. General Conditions - Alternative Operating Scenarios - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9VAC5-80-110)

Observation

The facility contact stated that the facility has not operated under an alternative operating scenario.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 61 **Compliance Status:** In Compliance

Applicable Requirement

61. General Conditions - Permit Availability - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9VAC5-80-110 and 9VAC5-80-150)

Observation

The facility maintains a copy of the permit onsite.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 62 **Compliance Status:** In Compliance

Applicable Requirement

62. General Conditions – Permit Availability – The permittee shall keep a copy of the 11/5/2018 minor NSR Permit on the premises of the facility to which it applies.

(9 VAC 5-80-110 and Condition 31 of the 11/5/2018 Permit)

Observation

The facility maintains a copy of the permit onsite.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 66 **Compliance Status:** In Compliance

Applicable Requirement

66. General Conditions - Stratospheric Ozone Protection - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the

federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F. (9VAC5-80-110 and 40 CFR Part 82)

Observation

It was noted that the facility has not handled or emitted one or more Class I or II substances subject to a standard promulgated under or established by Title VI.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 67

Compliance Status: In Compliance

Applicable Requirement

67. General Conditions - Asbestos Requirements - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150). (9VAC5-60-70 and 9VAC5-80-110)

Observation

It was noted that the facility has protocols in place to handle asbestos material appropriately and as required by Subpart M.

Effective Date: Nov 5, 2018 **Applicable Requirement #:** 68

Compliance Status: In Compliance

Applicable Requirement

68. General Conditions - Accidental Release Prevention - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68. (9VAC5-80-110 and 40 CFR Part 68)

Observation

It was noted that the facility has not had or will have more than a threshold quantity of a regulated substance in a process.