Phone #: (540) 562-6700

Registration #: 21547

Site Name:Region 2000 Regional Landfill-Livestock Rd Facilit CMS:N/A

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

Contacts: Elliot Inge: (434) 455-6078 Clarke Gibson,: (434) 455-6079 Report #:344221

Classification: True Minor

AIR INSPECTION REPORT

The purpose of this inspection report is to document DEQ's observations and, based on such observations, provide the compliance status at the date and time of the inspection 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: Mar 7, 2024

Reason: Complete FCE (Full Compliance

Evaluation)

Type: FCE With Site Visit Inspector: James Puckett In Compliance

Visit Date Arrival Time Departure Time Weather
3/7/2024 09:10 AM 11:05 AM Sunny 61 Degrees F

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

Approvals		
James D. Pretett, Ja.	Mangaret O. Wagner	

Inspector: James Puckett Signed Date: Mar 19, 2024 Supervisor: Margaret Wagner Approved Date: Mar 20, 2024

Report #:344221 (Continued)

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
11/5/2023 TITLEV	01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 26, 27, 28, 29, 30, 31, 32, 33, 35, 39, 40, 42, 43, 44, 47, 51, 52, 53, 56

Inspection Summary

Purpose: The purpose of this on-site inspection was to a Full Compliance Evaluation (FCE) with Region 2000 Regional Landfill - Livestock Rd. Facility, which took place on March 7, 2024.

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 and four CF-10 Solar Spark Flares rated at 21.25 MMBtu/hr and 700 scfm, with a rated capacity of 4,612,188 megagrams (Mg). There are approximately 200 trucks per day that bring trash into this landfill from multiple surrounding counties.

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, 2023. 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: During the most recent inspection conducted on July 20, 2021, the facility was considered to be in compliance. There are no enforcement actions associated with this facility at this time.

Inspection Notes: This facility currently has approximately 15 employees and the facility is currently operating 5 days/week regular schedule with 1 shift and open on Saturdays for half a day. Mr. Robert Arthur, Environmental Compliance/Safety Manager (Retired and filling in for Mr. Elliott Inge), led the inspector around the facility and provided records for review during the inspection. These records were emailed to the inspector on March 14, 2024. The facility maintains the permit and records electronically with documentation that support and demonstrate compliance with each permit condition. It shall be noted that there are only four CF-10 Solar Spark Flares (PCD-1) rated at 21.25 MMBtu/hr and 700 scfm, instead of five, which is outlined in the permit Emission Unit list. Also, at the time of this inspection, flares #1 and #2 (CF-10 Solar Spark Flares (PCD-1)) were in operation, as well as the #6 (PCD-2), which was operating at a flow rate of 1133 scfm.

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

Attachments:

- 1 21547 FCE Attachment 1
- 2 21547 FCE Attachment 2

Inspection Checklist

Effective Date: Nov 5, 2023 Applicable Requirement #: 01 Compliance Status: In Compliance

Applicable Requirement

Landfill Limitation (P01) - NSPS XXX Applicability - The provision of 40CFR60.760 (et. seq.) applies to each municipal solid waste landfill that commenced construction, reconstruction, or modification after July 17, 2014.

(9VAC5-80-110 and 40CFR60.760)

Observation

It was noted that the facility is applicable to the NSPS XXX requirements.

Compliance Status: In Compliance

Effective Date: Nov 5, 2023 Applicable Requirement

Landfill Limitation (P01) - Design Capacity - The design capacity of the MSW landfill is 4,612,188 Mg (5,114,898 m3), A change in the design capacity may require a permit to construct and operate.

Applicable Requirement #: 02

Applicable Requirement #: 03

(9VAC5-80-110 and Condition 1 of the 11/5/2018 Permit Document)

Observation

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

Compliance Status: In Compliance

Effective Date: Nov 5, 2023 Applicable Requirement

Landfill Limitation (P01) - Emission Controls - VOC emissions from the landfill shall be controlled by the 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 Condition 2 of the 11/5/2018 Permit Document)

Observation

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

Effective Date: Nov 5, 2023 Applicable Requirement #: 04 Compliance Status: In Compliance

Applicable Requirement

Landfill Limitation (P01) - Landfill Gas 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 40CFR60.764(a)(1)), the permittee shall comply with either subsection a, subsection b, or subsections c, d, and e. of this condition:

- a. Demonstrate the NMOC emission rate is less than 34 Mg per year through either Tier 2 testing in accordance with 40CFR60.767(a)(3) or Tier 3 testing in accordance with
- 40CFR764(a)(4) except as provided in 40CFR60.764(a)(5); or
- b. Demonstrate both of the following:
- i. Using Tier 1 or Tier 2 that NMOC emissions are greater than or equal to 34 and less than 50 Mg/year, and
- ii. Surface methane emissions do not exceed 500 ppm demonstrated by Tier 4 monitoring conducted in accordance with 40CFR60.764(a)(6); or
- c. Submit a landfill gas (LFG) collection and control system design plan meeting the requirements of 40CFR60.762(b)(2)(i) to the Blue Ridge Regional Office within one
- year after the first annual report in which the NMOC emission rate is greater than or equal to 34 Mg per year,
- d. Install a gas collection and control system (GCCS) in compliance with 40CFR 60.762(b)(2)(ii)(C) or (D), and 40CFR60.762(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
- e. Operate the installed gas collection and control device in compliance with 40CFR 60.762(b)(2)(iv).

The gas collection and control system may be removed if the provisions of 40CFR60.762(b)(2)(v) are satisfied.

(9VAC 5-80-110, 40CFR60,762(b), and Condition 3 of the 11/5/2018 Permit Document)

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 October 7, 2021, in compliance with NSPS WWW. The NMOC emission rate was 25.1 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 October 6, 2026.

Effective Date: Nov 5, 2023 Applicable Requirement #: 05 Compliance Status: In Compliance

Applicable Requirement

Landfill Limitation (PCD-2) - Open Flare - The 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.

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

Observation

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

(See Attachment 1 and Attachment 2)

Effective Date: Nov 5, 2023 Applicable Requirement #: 06

Compliance Status: In Compliance

Applicable Requirement

Landfill Limitation (P01) – Fugitive Dust Emission Controls - Unless otherwise specified, dust emission controls shall include the following or equivalent as a minimum:

- a. Dust from grading, cell construction, waste compaction, application of daily cover, wood waste chipping operations, storage piles and traffic areas shall be controlled by wet suppression or equivalent (as approved by the DEQ) control measures.
- b. All material being stockpiled shall be kept moist to control dust during storage and handling or covered to minimize emissions.
- c. Dust from haul roads shall be controlled by wet suppression and prompt removal of dried sediment resulting from soil erosion and dirt spilled or tracked onto paved surfaces within the landfill.
- d. Reasonable precautions shall be taken to prevent deposition of dirt on public roads and subsequent dust emissions. Dirt spilled or tracked onto paved surfaces shall be promptly removed to prevent particulate matter from becoming airborne.

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

Observation

It was noted that a water truck is used to control fugitive dust.

Effective Date: Nov 5, 2023 Applicable Requirement #: 07

Applicable Requirement

Landfill Limitation (P01) - Solid Waste Acceptance - 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 for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

(9VAC 5-80-110 and Condition 7 of the 11/5/2018 Permit Document)

Observation

Source records indicated 189,674 tons of solid waste accepted during the last 12 month period.

(See Attachement 1 and Attachment 2)

Effective Date: Nov 5, 2023 Applicable Requirement #: 08 Compliance Status: In Compliance

Compliance Status: In Compliance

Applicable Requirement

Landfill Limitation (P01) - Operating and Training Procedures - Emissions from the 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 Document)

Observation

Source contact provided training records, operating procedures and maintenance records, as outlined, for review during the inspection to demonstrate compliance with this condition.

(See Attachment 1 and Attachment 2)

Effective Date: Nov 5, 2023 Applicable Requirement #: 09 Compliance Status: In Compliance

Compliance Status: In Compliance

Applicable Requirement

Landfill Limitation (P01) - Fuel - The approved fuel for the 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 Document)

Observation

It was noted that the flare uses landfill gas (LFG). Propane is used when needed to light the flare. Applicable Requirement #: 10

Applicable Requirement

Effective Date: Nov 5, 2023

Landfill Limitation (P01) - Process Emissions - If a GCCS is required by Condition 4, 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:

PM10 0.017 lb/MMBtu 4.3 ton/vr

PM2.5 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 11/5/2018 Permit Document)

Observation

It was noted that a GCCS or a landfill gas collection and control system is not required at this time.

Effective Date: Nov 5, 2023 Applicable Requirement #: 11

Applicable Requirement

Landfill Operation Requirements (P01) – Visible Emission Limits - If a GCCS is required by Condition 4, or a landfill gas collection and system is installed, 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 a total of 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 11/5/2018 Permit Document)

Observation

It was noted that a GCCS or a landfill gas collection and control system is not required at this time.

Effective Date: Nov 5, 2023 Applicable Requirement #: 12

Compliance Status: In Compliance

Compliance Status: In Compliance

Applicable Requirement

Landfill Operation Requirements (P01) - Visible Emission Limit - Visible emissions from the flare (PCD-2) shall be designed for and operated with no visible emissions as determined by EPA Method 22, except for periods not to exceed a total of five minutes during any two consecutive hours. This condition applies at all times except during startup, shutdown and malfunction.

(9VAC5-80-110 and Condition 12 of the 11/5/2018 Permit Document)

Observation

At the time of this inspection, there were no visible emissions observed.

Effective Date: Nov 5, 2023 Applicable Requirement #: 13

Compliance Status: In Compliance

Applicable Requirement

Landfill Testing Requirements (P01) - Stack Test – If a GCCS is required by Condition 4, 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, 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 17 and shall conform to the test report format enclosed with this permit.

(9VAC5-80-110 and Condition 14 of the 11/5/2018 Permit Document)

Observation

It was noted that a GCCS or a landfill gas collection and control system is not required at this time.

Effective Date: Nov 5, 2023 Applicable Requirement #: 14

Compliance Status: In Compliance

Applicable Requirement

Landfill Testing Requirements (P01) - Visible Emissions Evaluation – Upon request by the DEQ, the permittee shall conduct additional visible emissions evaluation from the utility flare (PCD-2) to demonstrate compliance with the visible emission limit contained in this permit. The details of the test shall be arranged with the DEQ.

(9VAC5-80-110 and Condition 16 of the 11/5/2018 Permit Document)

Observation

It was noted that DEQ has not requested any additional VEE's on the utility flare (PCD-02) at this time.

Effective Date: Nov 5, 2023 Applicable Requirement #: 15

Compliance Status: In Compliance

Applicable Requirement

Landfill Recordkeeping Requirements - (P01) - On Site Records - The permittee shall maintain records of emission data and operating parameters as 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. Readily accessible, onsite records of the MSW landfill (P01) capacity.
- b. Annual calculated mass emission rate of NMOC from the MSW landfill (P01)
- c. The current amount of solid waste in place,
- d. The year-by-year or average waste acceptance rate
- e. Site-specific values for CNMOC and k, if obtained.

- f. The age of the landfill (P01).
- g. 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.
- h. Description and amount of clean daily cover materials which are excluded from the waste acceptance rates and from the landfill gas generation calculations.
- i. Records sufficient to calculate the facility's emissions on a 12-month rolling basis.
- i. If a GCCS is required by Condition 4, all records required in 40CFR60.768(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.
- k. Documentation to indicate the type of flare used to control LFG (PCD-2).
- I. Results of visible emission evaluation(s) for the flare (PCD-2).
- m. Written operating procedures, scheduled and unscheduled maintenance, and operator training for the flare (PCD-2) system.
- n. Documentation of the flare's (PCD-2) exit velocity in feet per second.
- o. Records to indicate the presence of the flare (PCD-2) flame.
- p. Monitoring records of the flare to ensure that it is operated and maintained in conformance with its design.
- g. Records required in 40CFR60.768.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9VAC5-80-110, 9VAC5-50-50, 40CFR60.768, and Condition 17 of 11/5/2018 Permit Document)

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.

As a preventative measure, the facility continues to perform daily observations of the flares.

(See Attachment 1 and Attachment 2)

Effective Date: Nov 5, 2023 Applicable Requirement #: 16 Compliance Status: In Compliance

Applicable Requirement

Landfill Reporting (P01) - NMOC Emission Report - The permittee shall annually except as provided for in 40CFR60.767(b) (1)(ii) and (b)(3), submit a NMOC emission rate report to the Blue Ridge Regional Office meeting the requirements of 40CFR60.767(b). Except as provided in Condition 21, one copy of the NMOC emission report shall be submitted to the U.S. Environmental Protection Agency at the address in Condition 22.c.

(9VAC5-80-110, 40CFR60.767(b), and Condition 18 of 11/5/2018 Permit Document)

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 October 7, 2021, in compliance with NSPS WWW. The NMOC emission rate was 25.1 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 October 6, 2026.

Effective Date: Nov 5, 2023 Applicable Requirement #: 17 Compliance Status: In Compliance

Applicable Requirement

Landfill Reporting (P01) - Annual Compliance Report - If a GCCS is required by Condition 4, the permittee using an active collection system shall submit to the Blue Ridge Regional Office annual reports of the recorded information in 40CFR 60.767(g)(1) through (g)(7). The initial report shall be submitted within 180 days of the installation and start-up of the collection and control system and shall include the initial performance test report required under 40CFR60.8. One copy of each annual compliance report shall be submitted to the U.S. Environmental Protection Agency at the address specified in Condition 22.c.

(9VAC5-80-110 and Condition 19 of 11/5/2018 Permit Document)

Observation

It was noted that a GCCS or a landfill gas collection and control system is not required at this time.

Effective Date: Nov 5, 2023 Applicable Requirement #: 18 Compliance Status: In Compliance

Applicable Requirement

Landfill Reporting (P01) – 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 40CFR60.767(e). Except as provided in Condition 21, one copy of the closure report shall be submitted to the U.S. Environmental Protection Agency at the address specified in Condition 22.c.

(9VAC5-80-110, 40CFR60.767(d), and Condition 20 of 11/5/2018 Permit Document)

Observation

It was noted that the facility currently remains in operation.

Effective Date: Nov 5, 2023 Applicable Requirement #: 19

Compliance Status: In Compliance

Applicable Requirement

Landfill Reporting (P01) – Control Equipment Removal Report – If a GCCS is required by Condition 4, no later than 30 days prior to the cessation of operation or removal of the control equipment, the permittee shall submit an equipment removal report to the Blue Ridge Regional Office in accordance with 40 CFR 60.767(f). One copy of the equipment removal report shall be submitted to the U.S. Environmental Protection Agency at the address specified in Condition 22.c.

(9VAC5-80-110 and Condition 21 of 11/5/2018 Permit Document)

Observation

It was noted that a GCCS or a landfill gas collection and control system is not required at this time.

Effective Date: Nov 5, 2023 Applicable Requirement #: 20

Compliance Status: In Compliance

Applicable Requirement

Landfill Reporting (P01) - Control Equipment Removal Report – The permittee shall submit an equipment removal report for the flare (PCD-2), to the Blue Ridge Regional Office, at least thirty days prior to the removal or cessation of operation of the control equipment.

(9VAC5-80-110 and Condition 22 of 11/5/2018 Permit Document)

Observation

It was noted that the facility/flare currently remains in operation.

Effective Date: Nov 5, 2023 Applicable Requirement #: 21

Compliance Status: In Compliance

Applicable Requirement

Landfill Reporting (P01) - NSPS XXX Reporting - Reports shall be submitted electronically as provided in 40CFR60.767(i). Reports submitted electronically pursuant to 40CFR60.767(i) do not need to also be submitted to the U.S. Environmental Protection Agency at the address specified in Condition 22.

(9VAC5-80-110 and 40CFR60.767)

Observation

It was noted that the facility submits reports (as applicable) electronically to EPA, as required by this condition.

Effective Date: Nov 5, 2023 Applicable Requirement #: 22 Compliance Status: In Compliance

Applicable Requirement

Landfill Operation Requirements - (P01) - Initial Notifications - The permittee shall furnish written notification to the Blue Ridge Regional Office of:

- a. The actual date on which construction of any MSW landfill modification commenced within 30 days after such date.
- b. The anticipated date of testing under Tiers 2, 3, or 4 to demonstrate NMOC emission rate of the landfill postmarked at least 30 days prior to such date. The Tier 4 notification shall meet the requirements of 40CFR60.767(I).

c. The anticipated date of performance tests of the gas collection and control system postmarked at least 30 days prior to such date.

Except as provided in Condition 21, copies of the written notifications referenced in items a and b above are to be sent to:

Chief. Air Section

United States Environmental Protection Agency

Region III, Enforcement & Compliance Assurance Division

Air, RCRA and Toxics Branch (3ED21)

Four Penn Center

1600 John F. Kennedy Boulevard

Philadelphia, Pennsylvania 19103-2852

(9VAC5-80-110 and Condition 23 of 11/5/2018 Permit Document)

Observation

It was noted that there have been no modifications to the landfill since the last inspection that would change design capacity. It was noted that Cell #5 recently opened, however, this is part of the initial design capacity. Cell #4 has been closed.

(See Attachment 1 and Attachment 2)

Effective Date: Nov 5, 2023 Applicable Requirement #: 23

Compliance Status: In Compliance

Applicable Requirement

3. Insignificant Emission Units - The following emission units at the facility are identified in the application as insignificant emission units under 9VAC5-80-720:

Emission Unit No. Emission Unit Description Citation Pollutant Emitted Rated Capacity (9VAC5-80-720B) (9VAC5-80-720C)

Observation

It was noted that there are no Insignificant Emission Units listed at this facility.

Effective Date: Nov 5, 2023 Applicable Requirement #: 26 Compliance Status: In Compliance

Applicable Requirement

26. General Conditions - Permit Expiration

- a. This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9VAC5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
- b. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- c. If an applicant submits a timely and complete application for an initial permit or renewal under 9VAC5-80-80 F, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9VAC5 Chapter 80, until the DEQ takes final action on the application under 9VAC5-80-150.
- d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9VAC5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9VAC5 Chapter 80.
- e. If an applicant submits a timely and complete application under section 9VAC5-80-80 for a permit renewal but the DEQ fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9VAC5-80-140, shall
- remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- f. The protection under subsections F 1 and F 5 (ii) of section 9VAC5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9VAC5-80-80 D, the applicant fails to submit by the deadline specified

in writing by the DEQ any additional information identified as being needed to process the application.

(9VAC5-80-80, 9VAC5-80-110 and 9VAC5-80-170)

Observation

It was noted that this permit expires on November 4, 2028.

Effective Date: Nov 5, 2023 Applicable Requirement #: 27

Compliance Status: In Compliance

Applicable Requirement

- . 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 this facility maintains records, as outlined, in this condition.

Effective Date: Nov 5, 2023 Applicable Requirement #: 28

Compliance Status: In Compliance

Applicable Requirement

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 records, as required, by this condition.

Effective Date: Nov 5, 2023 Applicable Requirement #: 29 Compliance Status: In Compliance

Applicable Requirement

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; and
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
- i. Exceedances of emissions limitations or operational restrictions;
- ii. Excursions from control device operating parameter requirements, as

documented by continuous emission monitoring or 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 semiannual reporting period."

(9VAC5-80-110)

Observation

It was noted that the facility has submitted the required Semi-Annual Monitoring Reports (SAMR) in a timely manner.

Effective Date: Nov 5, 2023 Applicable Requirement #: 30

Applicable Requirement

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 40CFR114(a)(3) and 40CFR504(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 9VAC5-80-110, 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 submitted the required Annual Compliance Certification in a timely manner.

Effective Date: Nov 5, 2023 Applicable Requirement #: 31

Compliance Status: In Compliance

Compliance Status: In Compliance

Applicable Requirement

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 semiannual compliance monitoring report pursuant to Condition 29 of this permit.

(9VAC5-80-110 F. 2)

Observation

It was noted that the facility has not reported any permit deviations during the last 12-month period.

Effective Date: Nov 5, 2023 Applicable Requirement #: 32

Compliance Status: In Compliance

Compliance Status: In Compliance

Applicable Requirement

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 no later than four daytime business hours after the malfunction is discovered, notify the Blue Ridge Regional Office such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Blue Ridge Regional Office.

(9VAC5-80-110, 9VAC5-20-180, and Condition 28 of 11/5/2018 Permit Document)

Observation

It was noted that there have been no malfunctions reported during the last 12-month period.

Applicable Requirement #: 33

Effective Date: Nov 5, 2023

Applicable Requirement

General Conditions - Records of Malfunction - 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 no later than four daytime business hours after the malfunction is discovered, notify the Blue Ridge Regional Office such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Blue Ridge Regional Office.

(9VAC5-80-110 and Condition 28 of 11/5/2018 Permit Document)

Observation

It was noted that there have been no malfunctions reported during the last 12-month period.

Effective Date: Nov 5, 2023 Applicable Requirement #: 35

Compliance Status: In Compliance

Applicable Requirement

General Conditions - Duty to Comply - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9VAC5-80-110)

Observation

It was noted that the facility complies with all terms and conditions of the permit.

Effective Date: Nov 5, 2023 Applicable Requirement #: 39

Compliance Status: In Compliance

Applicable Requirement

General Conditions - Duty to Submit Information - The permittee shall furnish to the DEQ, within a reasonable time, any information that the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality.

(9VAC5-80-110)

Observation

It was noted that the facility provides records upon request in a timely manner.

Effective Date: Nov 5, 2023 Applicable Requirement #: 40

Compliance Status: In Compliance

Applicable Requirement

General Conditions - Duty to Submit Information - Any document (including reports) required in a permit condition to be submitted to the DEQ shall contain a certification by a responsible official that meets the requirements of 9VAC5-80-80 G.

(9VAC5-80-110)

Observation

It was noted that any required document or report includes a document certification.

Effective Date: Nov 5, 2023 Applicable Requirement #: 42

Compliance Status: In Compliance

Applicable Requirement

General Conditions - Fugitive Dust Emission Standards - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
- d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9VAC5-80-110 and 9VAC5-50-90)

Observation

It was noted that a water truck is used to control fugitive dust.

Effective Date: Nov 5, 2023 Applicable Requirement #: 43

Applicable Requirement

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 DEQ, which may include, but is not limited to, monitoring results, opacity observations, review

(9VAC5-80-110, 9VAC5-50-20 E and Condition 26 of the 11/5/2018 Permit Document)

of operating and maintenance procedures, and inspection of the source.

Observation

It was noted that there have been no malfunctions reported during the last 12-month period.

Effective Date: Nov 5, 2023 Applicable Requirement #: 44 Compliance Status: In Compliance

Applicable Requirement

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 9VAC5-80-140 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 9VAC5 Chapter 80, Article 1.

(9VAC5-80-110)

Observation

It was noted that the facility has not operated with an Alternative Operating Scenario.

Effective Date: Nov 5, 2023 Applicable Requirement #: 47 Compliance Status: In Compliance

Applicable Requirement

. 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

It was noted that the permit was available and onsite.

Effective Date: Nov 5, 2023 Applicable Requirement #: 51 Compliance Status: In Compliance

Applicable Requirement

. 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 noe 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.

Effective Date: Nov 5, 2023 Applicable Requirement #: 52 Compliance Status: In Compliance

Applicable Requirement

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

Compliance Status: In Compliance

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 complies with the requirements of National Emission Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos.

Effective Date: Nov 5, 2023 Applicable Requirement #: 53

Compliance Status: In Compliance

Applicable Requirement

. 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 more than a treshold quantity of a regulated substance in a process during the last 12-month period.

Effective Date: Nov 5, 2023 Applicable Requirement #: 56

Compliance Status: In Compliance

Applicable Requirement

General Conditions - Permit Copy - The permittee shall keep a copy of the November 5, 2018 permit on the premises of the facility to which it applies.

(9VAC5-80-110 and Condition 31 of the 11/5/2018 Permit Document)

Observation

A copy of the permit was onsite.