



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 #: 321719

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: Dec 19, 2018  
 Inspection Reason: Review Other Protocol Report  
 Reporting Period:  
 Inspector: James Puckett  
 Inspection Result: In Compliance

Program Code	Subpart
SIP	
TITLE V	

### Approvals

*James D. Puckett, Jr.*

*Margaret D. Wagner*

Inspector: James Puckett  
Signed Date: Dec 19, 2018

Supervisor: Margaret Wagner  
Approved Date: Dec 26, 2018

## 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 NSR	015
11/5/2018 TITLEV	13

## Inspection Summary

### I. Summary

A. Test Date(s): week of January 21, 2019

B. Testing Firm: SCS Engineers - Victoria Essex and Robert Dick

C. Test Reason: Condition 13a of the Title V Permit dated November 5, 2018 and condition 15 of the NSR Permit dated November 5, 2018, states the following: "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."

D. Process/Equipment Tested and Associated Control Equipment: Landfill Gas Utility Flare

E. Pollutant(s) & Test Method(s): This flare device is a 10-inch-diameter utility flare manufactured by Perennial Energy, Inc. (PEI) and is capable of handling up to 2,000 scfm of LFG (60.72 million BTU per hour). The LFG collection rate at the Landfill is currently ranging between approximately 600 and 800 cubic feet per minute (cfm) and there will likely not be sufficient LFG production to operate the flare at its maximum rate of 2,000 scfm for several more years. However, an initial visible emission evaluation must be performed no later than 180 days after initial flare startup per Condition 13.a. of the Facility's Title V Permit. So, the target process rate during the VEE is approximately 700 cfm. EPA Method 22 will be conducted to document visible emissions for a period of approximately 2 hours.

F. Parametric Limits: The operating rate will be at least 700cfm during the testing phase. EPA Method 22 will be conducted to document visible emissions for a period of approximately 2 hours.

### II. Requirements

For each of the following:

OK = No Compliance Issues

XX = Compliance Issues

NA = Not Applicable

OK - Protocol received within 30 days prior to proposed test date

OK - Signed Document Certification

NA - Standardized Stack Test Protocol form used

OK - Appropriate details, methods, and information provided

NA - VELAP certified/accredited laboratory

III. Determination

The Stack Test Protocol is APPROVED.

IV. Attachments:

Protocol for VE's of the Landfill Gas Utility Flare

## Inspection Checklist

**Effective Date:** Nov 5, 2018    **Applicable Requirement #:** 015

**Compliance Status:** In Compliance

### Applicable Requirement

15. Visible Emissions Evaluation - Initial visible emissions evaluation (VEE) shall be conducted on the flare (PCD-2) to determine compliance with the visible emissions standard in Condition 12. The observation period is two hours and shall be conducted according to EPA Reference Method 22. The details of the tests are to be arranged with the Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies, one paper copy and one on removable electronic media, of the test results 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.

(9VAC5-80-1180 and 9VAC5-50-30) [November 5, 2018]

### Observation

It was noted that the VEE protocol was submitted in a timely manner. The test results shall be submitted within 60 days of test completion.

(See attached)

**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 permittee 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

It was noted that the VEE protocol was submitted in a timely manner. The test results shall be submitted within 60 days of test completion.

(See attached)