

# ADEQ MINOR SOURCE AIR PERMIT

Permit No. : 2069-AR-1

IS ISSUED TO:

IESI-AR Landfill, Corp. dba  
Cherokee Sanitary Landfill  
300 Landfill Road  
Cherokee Village, AR 72529  
Fulton County  
AFIN: 25-00028

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ.*) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

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Mike Bates  
Chief, Air Division

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Date

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#### List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SO <sub>2</sub>	Sulfur Dioxide
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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Section I: FACILITY INFORMATION

PERMITTEE: IESI-AR Landfill Corp. dba  
Cherokee Sanitary Landfill

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PERMIT NUMBER: 2069-AR-1

FACILITY ADDRESS: 300 Landfill Road  
Cherokee Village, AR 72529

MAILING ADDRESS: Cherokee Sanitary Landfill  
Cherokee Village, AR 72529

COUNTY: Fulton

CONTACT POSITION: Rod Smith, Landfill Manager

TELEPHONE NUMBER: 870-994-7717

REVIEWING ENGINEER: Shawn Hutchings

UTM North South (Y): Zone 15: 4016.06

UTM East West (X): Zone 15: 621.94

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## Section II: INTRODUCTION

IESI-AR Landfill Corporation owns and operates both Class 1 and Class 4 solid waste landfills in Fulton County located approximately 5 miles northwest of the city of Ash Flat (off Arkansas Highway 289). The Cherokee Sanitary Landfill, Inc. was originally permitted for solid waste disposal in 1975. The facility has a 120 acre permitted Class 1 landfill area, a 20 acre Class 4 waste disposal area, and a 10 acre area used for support facilities. Since the design capacity of the landfill is greater than 2,500,000 Mg it is subject to the Provisions of NSPS Subpart WWWW.

### Summary of Permit Activity

The Cherokee Sanitary Landfill, is adjusting their emission limits to rates based upon the latest Tier II test performed under NSPS Subpart WWWW. Emission limits for VOC dropped from 18.4 tons to 15 tons per year.

### Process Description

Municipal Solid Waste (MSW) is collected from the surrounding areas industrial, commercial, and residential sources. The MSW is dumped onto the landfill surface and compacted. Daily cover or intermediate cover, which consists of six or twelve inches of soil, respectively, is placed upon the garbage at the end of the work day.

The application of daily and intermediate cover encapsulates the refuse from each day. The refuse will undergo the various phases of gas production, and dependent upon when the cell was created, various cells will undergo different quantities of gas production. Factors such as available nutrients, moisture content, and compaction will greatly affect the quantity of gas produced.

Emissions from the facility will be uncontrolled landfill gases (SN-1) which are non-point source emissions.

### Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
40 CFR Part 60, Subpart WWWW, <i>Standards of Performance for Municipal Solid Waste Landfills.</i>

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The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Total Allowable Emissions

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
VOC	3.5	15.0
Toluene	0.63	2.77
Perchloroethylene	0.11	0.47
Chlorobenzene	0.01	0.02
Ethylbenzene	0.08	0.37
1,1,2,2-tetrachloroethane	0.03	0.14
1,1,2 trichloroethane	0.01	0.01
1,1-dichloroethene	0.01	0.01
Acrylonitrile	0.06	0.252
Benzene	0.03	0.11
Carbon disulfide	0.01	0.03
Carbon tetrachloride	0.01	0.01
Carbonyl sulfide	0.01	0.02
Chloroethane	0.02	0.07
Chloroform	0.01	0.01
Chloromethane	0.01	0.04
Vinyl chloride	0.08	0.35
Dichlorobenzene	0.01	0.02
Dichloromethane	0.21	0.94
1,1-dichloroethane	0.04	0.18
Xylene	0.22	0.98
1,2, dichloroethane	0.01	0.03
1,1,1-trichloroethane	0.01	0.06
Hexane	0.10	0.43
1,2 dichloropropane	0.01	0.01
Trichloroethene	0.06	0.29
Methyl isobutyl ketone	0.03	0.14

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### Section III: PERMIT HISTORY

Permit No. 2069-A is the initial air permit for Cherokee Sanitary Landfill. It was issued on January 12, 2005.

Section IV: EMISSION UNIT INFORMATION

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 19, §19.501 et seq., effective December 19, 2004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Landfill Gas Emissions	VOC	3.5	15.0

2. The permittee shall not exceed the emission rates set forth in the following table.  
 [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Landfill Gas Emissions	Toluene	0.63	2.77
		Perchloroethylene	0.11	0.47
		Chlorobenzene	0.01	0.02
		Ethylbenzene	0.08	0.37
		1,1,2,2-tetrachloroethane	0.03	0.14
		1,1,2 trichloroethane	0.01	0.01
		1,1-dichloroethene	0.01	0.01
		Acrylonitrile	0.06	0.252
		Benzene	0.03	0.11
		Carbon disulfide	0.01	0.03
		Carbon tetrachloride	0.01	0.01
		Carbonyl sulfide	0.01	0.02
		Chloroethane	0.02	0.07
		Chloroform	0.01	0.01
		Chloromethane	0.01	0.04
		Vinyl chloride	0.08	0.35
		Dichlorobenzene	0.01	0.02
		Dichloromethane	0.21	0.94
		1,1-dichloroethane	0.04	0.18
		Xylene	0.22	0.98
1,2, dichloroethane	0.01	0.03		
1,1,1-trichloroethane	0.01	0.06		
Hexane	0.10	0.43		
1,2 dichloropropane	0.01	0.01		
Trichloroethene	0.06	0.29		
Methyl isobutyl ketone	0.03	0.14		



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3. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

NSPS Conditions

5. The permittee is subject to and shall comply with 40 CFR Part 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills (Attachment 1) since it has a design fill capacity in excess of 2,500,000 Mg and the facility was modified after May 30, 1991. Based on Tier 2 testing, it is exempt from the first cycle of Part 70 permitting due to emissions of all criteria pollutants being less than 100 tpy and is exempt at this time from the requirements for installation of a landfill gas collection and control system because their NMOC emissions are calculated to be less than 50 Mg per year. [§19.304 of Regulation 19 and 40 CFR 60, Subpart WWW]
6. The permittee shall not exceed more than 1.65 million tons of cumulative waste in place up to December 31, 2010. This will show compliance through the 2011 calendar year. Specific Condition 11 requires and application to update the permit by January 1, 2011. The permittee shall maintain records of the amount of refuse accepted to date. Records shall be updated by the last day of the following month, kept on site and provided to Department personnel upon request. [§19.304 of Regulation 19 and 60.758(a) of 40 CFR 60, Subpart WWW]
7. The permittee shall submit each year an annual and projected 5 year emissions report to ADEQ using the calculation methods outlined in 40 CFR § 60.754(a)(1) until the calculated NMOC emission rate exceeds 50 Mg per year or the landfill is closed. Calculations shall use the latest measured site specific NMOC concentration. [§19.304 of Regulation 19 and 60.752(b) of 40 CFR 60, Subpart WWW]
8. The permittee shall retest their site specific NMOC concentration every 5 years using the test methods described in 40 CFR § 60.754(a)(3) for as long as the calculated emissions are less than 50 Mg per year. The permittee shall notify the Department of the scheduled date of testing at least fifteen (15) days in advance of such test. The next test shall be completed prior to September 1, 2010. Test results shall be submitted to the Department within thirty (30) days after the completed testing. [§19.304 of Regulation 19 and 40 CFR 60, Subpart WWW]

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9. Should the calculated NMOC emission rate exceed 50 Mg per year, the permittee shall design, install, and operate a landfill gas collection and control system as outlined in 40 CFR § 60.752(b)(2) or proceed with Tier 3 testing as outlined in 40 CFR § 60.754(a)(4) to establish that the actual NMOC emissions are less than 50 Mg per year. [§19.304 of Regulation 19 and 60.73(b)(ii)(A) of 40 CFR 60, Subpart WWW]
10. The permittee shall be required to modify this permit before starting any modification, construction, or reconstruction at the facility not described in this permit including but not limited to installation of a gas collection system and /or flare system. [§19.304 of Regulation 19 and 40 CFR 60, Subpart WWW]
11. The permittee shall submit an application to modify their emission for this facility by January 1, 2011. The emission limits in this permit were only based through the year 2011.

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Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated June 16, 2004.

Description	Category
2,500 gallon diesel fuel tank	Group A, No. 3

Section VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality  
Air Division  
ATTN: Compliance Inspector Supervisor  
Post Office Box 8913

Little Rock, AR 72219

7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
8. The permittee will provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods
  - b. Safe sampling platforms
  - c. Safe access to sampling platforms
  - d. Utilities for sampling and testing equipment
9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
  - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
  - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences,

including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
  - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
  - c. To inspect any monitoring equipment or monitoring method required in this permit;
  - d. To sample any emission of pollutants; and
  - e. To perform an operation and maintenance inspection of the permitted source.
12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated '8 1 106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

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16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
17. This permit supersedes and voids all previously issued air permits for this facility. [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]





## APPENDIX A

