

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1884-AOP-R4 AFIN: 72-00144

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Eco-Vista, LLC
2210 Waste Management Drive
Springdale, Arkansas 72762

3. PERMIT WRITER:

Derrick Brown

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Solid Waste Landfill
NAICS Code: 562212

5. SUBMITTALS:

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
May 2013	Renewal	None
September 2013	Modification	Increase in design capacity of the facility.

6. REVIEWER'S NOTES:

Waste Management of Arkansas, Inc. (WM) owns and operates a municipal solid waste landfill (NAICS 562212), Eco-Vista, LLC (EVLFF), (AFIN: 72-00144), located at 2210 Waste Management Drive, Springdale, Washington County, Arkansas 72762. This permit action incorporates the facility's renewal air permit application. Also, this action allows an expansion for the facility's landfill from 11,086,000 cubic yards to 15,990,000 cubic yards. On December 19, 2013 EVLFF submitted a Tier 2 Test Report to the Department (ADEQ) demonstrating that the 50 Mg/yr NMOC threshold had been

exceeded. VOC, PM and PM₁₀ annual emissions were increased by 17.3, 71.9, and 34.3 tons per year respectively.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility has no active/pending enforcement actions.

8. PSD APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes, explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	VOC (NMOC)	NSPS Subpart WWW
04 through 08	VOC, CO, NO _x	NSPS Subpart JJJJ
04 through 08	CO or Formaldehyde	NESHAP Subpart ZZZZ

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. NAAQS EVALUATIONS AND NON-CRITERIA POLLUTANTS:

a) Reserved.

b) Non-Criteria Pollutants:

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
1, 1-Dichloroethane (Ethylidene dichloride, CAS 75-34-3)	404.8	44.528	0.08	PASS
1,1-Dichloroethylene (Vinylidene chloride, CAS 75-35-4)	19.82	2.1802	0.01	PASS
Dichlorobenzene (CAS 106-46-7)	60.13	6.614	0.21	PASS
Ethyl benzene	434.2	47.762	0.70	PASS
Toluene	75.36	8.2896	2.27	PASS
Vinyl Chloride	2.56	0.2816	0.05	PASS
Xylene	434.2	47.762	1.71	PASS
Hydrochloric Acid (HCl)	2.984	0.328	1.34	FAIL
Formaldehyde	1.5	0.040	1.62	FAIL

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
HCl	29.84	3.09	PASS
Formaldehyde	15.0	1.57	PASS

Other Modeling: None.

12. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	AP-42 – criteria WIAC* for HAPs * Trade Organization	Varies	None	n/a	Operating scenario: 100% of LFG is emitted uncontrolled over the landfill surface. Concentration of NMOC based on site specific Tier 2 test values of 239 ppmv as hexane (Mar 2009)
01 – PCS**	Data provided by WM ** Petroleum Contaminated Soil	50 ppm organic content	None	n/a	100% fuel evaporation highly conservative, assumed all organics would be emitted into air
02A/B Flares	<u>PM</u> – AP-42 2.4 Table 2.4-5 footnote a (11/98) <u>SO₂</u> – 4/2009 Test data 77 ppmv <u>NMOC</u> – AP-42 2.4 Table 2.4-2 (11/98) <u>CO & NO_x</u> – Vendor/Flare Guarantee HAPs – WIAC	<u>PM</u> = 17 lb/10-6 dscf Methane (0.00102 lb/hr/dscfm) <u>SO₂</u> = 400 ppmv Reduced S <u>NMOC</u> = 595 ppmv default <u>CO</u> = 0.370 lb/MMBtu <u>NO_x</u> = 0.068 lb/MMBtu Varies , see Table 2.4-1	Flares	NMOC – 98% HAPs - 98.0%	6 Op Scenarios Open candlestick, dual Flares , variable each 225 to 2250 scfm = combined 450 to 4500 scfm max @8760 hr/yr @1012 BTU/scf Methane @55% Methane Concentration for PM, SO ₂ & NO _x NMOC = 100% VOC

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
04-08 IC Engines	<p><u>PM</u> – AP-42, Table 2.4-5 (11/98)</p> <p><u>SO₂</u> – 4/2009 Test data 77 ppmv</p> <p>AP-42 2.4 Eq #3, 4, & 7</p> <p><u>VOC</u> = NMOC =</p> <p><u>CO</u> & <u>NO_x</u> – based on Two Pine LF, Cat 3516 engines perf stack test dated 04/15/2008</p> <p><u>Formaldehyde</u>- Process knowledge</p>	<p><u>PM</u> = 48 lb/10⁶ dscfm</p> <p><u>SO₂</u> = 400 ppmv</p> <p><u>VOC</u> =</p> <p><u>CO</u> = 2.7 g/bhp-hr</p> <p><u>NO_x</u> = 1.5 g/bhp-hr</p> <p>@max 313 scfm</p> <p><u>Formaldehyde</u> = 453.59 g/lb</p>	<p>5 Cat Engines Lean Burn</p> <p>After cooled</p> <p>Filter treatment to remove PM10 prior to gas entering engines</p>	n/a	New Engines to be installed in 2010 for LFGTE
03	<p>PM – AP-42 Section 13.2.2 Tables 13.2.1.3, 13.2.2-1,-2,-3 (11/06)</p>	<p>formula PM = 5.38 lb/ VMT*</p> <p>PM10 = 1.45 lb/VMT*</p>	<p>Water suppression, speed limits, etc., as necessary</p>	None	Other means to suppress dust are allowed, speed limits, plastic cover instead of soil, etc.

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
02	CO	EPA Method 10	Every 3 years	§19.702
04-08	CO NO _x	EPA Methods 7E and 10	Within 180 Days of initial startup plus every 8760 op hours or 3 years whichever comes first	PWC #3 & Subpart JJJ, §60.4243(b)(2)(ii) & Reg 19, §19.501

SN	Pollutants	Test Method	Test Interval	Justification
04-08	VOC	EPA Methods 25A & 18	Within 180 Days of initial startup plus every 8760 op hours or 3 years whichever comes first	NSPS – 40 CFR Part 60, Subpart JJJ & Reg 19, §19.501
04-08 (One only)	Formaldehyde	EPA Method 320 or otherwise approved	One engine, initial test within 180 days of startup	Reg 18, §18.1004 & A.C.A.

14. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
02	CO	EPA Method 10	Every 3 years	§19.702
04-08	CO NO _x	EPA Methods 7E and 10	Within 180 Days of initial startup plus every 8760 op hours or 3 years whichever comes first	PWC #3 & Subpart JJJ, §60.4243(b)(2)(ii)] & Reg 19, §19.501
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15. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Facility	Total in-place Municipal Solid Waste	11,086,000 CY design capacity (Tons accepted converted to CY)	Monthly	Y
Facility	Weigh Each Truck Load and Record Monthly & 12-month rolling Acceptance Rate	None	Monthly	N
Facility	Plot Map of collector system	None	On-going	N
Facility	Asbestos-containing or non-degradable waste: nature, date, quantity received & location	None	On-going	N
02A, 02B, 04 thru 08	Maintenance Log	Maintain Good Operating Practices	Monthly	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		Maintain records		
40 CFR Part 60 Subpart JJJJ engines	Notification, documentation (tests) of meeting emissions	Maintain Good Operating Practices	On-going	Y
Facility (04 thru 08)	List of Engines w/model date and purchase date	Keep for life of engine	Within 30 days of installation	N
04 thru 08	Operating Hours	Non-resettable Hourly Operating Meter	On-going	No
02A & 02B	scfm	Varies with OSs	Every 15 minutes	Yes
02A, 02B, 04 thru 08	Number of Engines Operating and combined max rate gas flow (SCFM) of flares and engines	313 scfm max per engine & nte OSs #1-6	On-going and whenever a change occurs	Yes
01	NMOC SN-01	50 Mg/yr	Annually	Yes
02A, 02B, 04 thru 08	Performance Tests	Varies	Varies	Yes

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
Off-site	5%	Reg. #18.501 & A.C.A.	Observation & Dust Suppression methods, NPDES permit required.
04 through 08	5%	Reg. #18.501 & A.C.A.	Landfill gas as the only fuel.

17. DELETED CONDITIONS:

Former SC	Justification for removal
Plantwide Condition 11	On December 19, 2013, EVLF submitted test results to the ADEQ demonstrating that the 50 Mg/yr NMOC threshold had been exceeded and was complying with future NSPS WWW deadlines contained in §60.752.

18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Cat.	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Ingersoll-Rand 30 HP, 185 Diesel Air Compressor	A-1	0.217	0.202	0.243	0.658	3.055	---	0.00261
Kubota 18 HP, D905-E Diesel Light Plant	A-1	0.130	0.121	0.146	0.395	1.833	---	0.00247
Honda 5.5 HP Gasoline Motor	A-1	1.30E-02	0.0107	0.271	7.932	0.199	---	---
Two (2) Diesel Powered Shop Heaters	A-1	0.08	0.06	0.08	0.22	1.04	---	---
34 HP, 220 V Diesel Generator	A-1	0.01	0.01	0.01	0.01	0.03	--	---
Subaru Pump 18 Hp	A-1	0.01	0.01	0.01	0.02	0.09	---	---
John Deere Pump 84 Hp	A-1	0.03	0.03	0.04	0.10	0.48	---	---
Deutzag Pump 32 Hp	A-1	0.01	0.01	0.01	0.04	0.18	---	---
Honda Pump 5.5 Hp	A-1	0.01	0.01	0.01	0.01	0.01	---	---
Honda Pump 11.0 Hp	A-1	0.01	0.01	0.01	0.01	0.01	---	---
Subaru Emg Generator	A-1	0.01	0.01	0.01	0.01	0.01	---	---
Summary of above	A-1	<10	<10	<10	<10	<10	<5	<5
Emission Summary using TANKS 4.0.9d for each of the seven (7) tanks.								
500 Gal Used Oil Tank	A-3	---	---	0.019	---	---	---	---
350 Gal Engine Oil Tank	A-3	---	---	0.013	---	---	---	---

Source Name	Group A Cat.	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
350 Gal Transmission Oil Tank	A-3	---	---	0.009	---	---	---	---
Two (2) 300 Gallon Hydraulic Oil Tank	A-3	---	---	0.011	---	---	---	---
550 Gal Diesel Fuel Truck Tank	A-3	---	---	0.311	---	---	---	---
2,000 Gallon Diesel Fuel Tank	A-3	---	---	0.837	---	---	---	---
6 Tanks Summary of above	A-3	---	---	<5.0	---	---	---	---
Leachate Collection System	A-13	Air emissions are water vapor. Leachate goes to sewer system for treatment.						

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1884-AOP-R3

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

