

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 1994-AOP-R0

IS ISSUED TO:

Crittenden County Sanitary Landfill
1299 Kuhn Road
West Memphis, AR 72301
Crittenden County
CSN: 18-0094

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

and

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE:	Crittenden County Sanitary Landfill
CSN:	18-0094
PERMIT NUMBER:	1994-AOP-R0
 FACILITY ADDRESS:	 1299 Kuhn Road West Memphis, AR 72301
 COUNTY:	 Crittenden
CONTACT POSITION:	David Looney
TELEPHONE NUMBER:	(870) 732-4290
 REVIEWING ENGINEER:	 David Triplett
 UTM North-South (Y):	 Zone 15 [3893]
 UTM East-West (X):	 Zone 15 [756]

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

SECTION II: INTRODUCTION

Summary of Permit Activity

Crittenden County currently owns and operates a municipal solid waste landfill located at 1299 Kuhn Road in West Memphis, Arkansas. This facility occupies approximately 100 acres consisting of a Class I landfill area, a Class IV landfill area, a composting area, and ancillary facilities. This facility is required to obtain a Title V Operating Air Permit under the provisions of 40 CFR Part 60 Subpart WWW - *Standards of Performance for Municipal Solid Waste Landfills*. This will be the initial air permitting action for this existing facility.

Process Description

The Crittenden County Sanitary Landfill is a municipal solid waste landfill facility with a current void space capacity of approximately 4,166,515 cubic yards. Assuming a 5:1 waste to soil ratio to account for daily cover and interior roads, this corresponds to approximately 3,472,096 cubic yards of waste disposal capacity (future and in-place). The landfill currently consists of one area with approximately twenty (20) total acres of landfill footprint. This area is being filled from east to west, with the oldest waste located in the eastern toe of the area.

Solid waste decomposition is initiated by aerobic bacteria present within the waste at the time of disposal. The primary gas produced during this phase of decomposition is carbon dioxide. As the oxygen supply is depleted within the waste, facultative bacteria continue the decomposition process. Eventually, anaerobic bacteria become the predominant means of waste decomposition. In this stage of the process, methane and carbon dioxide are produced at roughly a 50-50 ratio. Other components present in the landfill gas include hydrogen sulfide and non-methane organic compounds (NMOC). Some NMOCs are volatile organic compounds (VOCs). Additionally, small quantities of various hazardous air pollutants (HAPs) are also generated from the decomposition process. These include toluene, xylene, dichloromethane, and several other species in smaller quantities.

Initial NMOC calculations for this facility indicated that it was above the NSPS limit of 50 Mg/yr for NMOC emissions, and would therefore be required to install a collection and control system in accordance to 40 CFR Part 60 Subpart WWW. However, tier II site testing was performed in accordance to subpart WWW and site specific NMOC emissions were determined to be 41.41 Mg/yr for the year 2001. Therefore this facility is currently exempt from the requirement to install a landfill gas collection and control system. NMOC emissions must be calculated and submitted annually in order to determine compliance with subpart WWW. If at any future date the NMOC emissions exceed 50 Mg/yr then a gas control system must be

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

installed at that time. Based on the initial Tier II site testing, it was predicted that the NMOC emissions from the facility would exceed 50 Mg/yr in 2004 or 2005. This landfill is currently slated for closure in the year 2017.

Regulations

This facility is subject to regulation under the *Arkansas Air Pollution Control Code* (Regulation 18), the *Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), and the *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26). Additionally, this facility is subject to the conditions of 40 CFR Part 60 Subpart WWW - *Standards of Performance for Municipal Solid Waste Landfills*.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
	Total Allowable Emissions	VOC	12.5	54.7	
	HAPs*	1,1,2,2-Tetrachloroethane*	0.03	0.13	
		1,1-Dichloroethane*	0.04	0.17	
		Acrylonitrile*	0.06	0.24	
		Dichloromethane	0.20	0.85	
		Toluene*	0.58	2.53	
		Vinyl Chloride*	0.08	0.32	
		Xylene*	0.21	0.90	
SN-01	Solid Waste Landfill	VOC	12.5	54.7	7
		1,1,2,2-Tetrachloroethane	0.03	0.13	
		1,1-Dichloroethane	0.04	0.17	
		Acrylonitrile	0.06	0.24	
		Dichloromethane	0.20	0.85	
		Toluene	0.58	2.53	
		Vinyl Chloride	0.08	0.32	
		Xylene	0.21	0.90	

* HAPs included in the VOC totals are indicated by an *. Other HAPs are not included in any other totals unless specifically stated.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

SECTION III: PERMIT HISTORY

This is the initial air permit for this existing facility.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

SECTION IV: EMISSION UNIT INFORMATION

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

SN-01
Source Name

Uncontrolled Landfill Gas Emissions

Source Description

This source represents the landfill gas (LFG) emissions generated by the decomposition of the solid waste present in the landfill. These emissions are fugitive in nature.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Conditions #5, #6, and #9.

Pollutant	lb/hr	tpy
VOC (NMOC)	12.5	54.7

2. Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by compliance with Specific Conditions #5, #6, and #9.

Pollutant	lb/hr	tpy
1,1,2,2- Tetrachloroethane	0.03	0.13
1,1-Dichloroethane	0.04	0.17
Acrylonitrile	0.06	0.24
Dichloromethane	0.20	0.85

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

Pollutant	lb/hr	tpy
Toluene	0.58	2.53
Vinyl Chloride	0.08	0.32
Xylene	0.21	0.90

3. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 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.
4. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
5. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not accept more than 75,904 Mg (83,670 tons) of solid waste per consecutive 12-month period.
6. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall not exceed more than 1,254,000 Mg (1,382,298 tons) of total in-place solid waste at this facility.
7. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6, the permittee shall maintain monthly records which demonstrate compliance with Specific Conditions #5 and #6. These records shall indicate the amount of solid waste accepted at the facility during the previous month, as well as a running total of the amount of in-place solid waste. Records shall be updated by the fifteenth day of the month following the month to which the records pertain. A twelve month rolling total and each individual month's data shall be kept on site, and shall be made available to Department personnel upon request. These records shall be submitted to the Department in accordance with General Provision #7.

NSPS Requirements

8. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.752, the permittee is subject to

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

and shall comply with the provisions of 40 CFR Part 60 Subpart WWW - *Standards of Performance for Municipal Solid Waste Landfills* (Appendix A).

9. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.757, the permittee shall compile an annual report of the NMOC emissions from the facility. This report shall be calculated using the test date from the most recent Tier II testing performed at the site. These reports shall be submitted in to the Department accordance with General Provision #7.
10. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.757, if at any time the annual NMOC emissions are determined to exceed 50 Mg/yr then a landfill gas collection and control system must be installed in accordance with 40 CFR Part 60 Subpart WWW. A collection and control system design plan shall be submitted to the Department within 1 year of the first report in which the NMOC emission rate exceeds 50 Mg/yr. The facility shall also apply for and obtain an air permit modification from the Department prior to the installation of such equipment.
11. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.754, the permittee shall retest the Tier II site-specific NMOC concentration every 5 years according to the methods specified in 40 CFR §60.754. The next NMOC test shall be performed on or before June 27, 2005. The results of this test shall be submitted with the annual report required in Specific Condition #8.
12. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.757, the permittee shall submit a closure report to the administrator within 30 days of cessation of waste acceptance.
13. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.758, the permittee shall maintain up-to-date records of the maximum design capacity of the landfill, the current in-place amount of solid waste, and the yearly waste acceptance rate. These records shall be updated monthly, be kept on site for a period of at least 5 years, and be made available to Department personnel upon request.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Crittenden County Sanitary Landfill is in compliance with the applicable regulations cited in the permit application. Crittenden County Sanitary Landfill will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - 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
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated April 19, 2001.

Description	Category
No Insignificant Activities have been identified	

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which 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 which 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. Pursuant to 40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.406 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.701(A)(2) of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

- 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.
6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 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 this permit.
7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.
- Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219
8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

- e. The duration of the deviation,
- f. The average emissions during the deviation,
- g. The probable cause of such deviations,
- h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

- 9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
- 10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.701(F)(1) of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- 11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director 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 Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.701(I)(1) of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 CFR 70.6(b) and §26.702(A) and (B) of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

19. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or

Crittenden County Sanitary Landfill
Permit #: 1994-AOP-R0
CSN #: 18-0094

by §114(a)(3) and 504(b) of the Act.

22. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

INVOICE REQUEST FORM

PDS-

Date April 4, 2003

<input checked="" type="checkbox"/>	Air
<input type="checkbox"/>	NPDES
<input type="checkbox"/>	Stormwater
<input type="checkbox"/>	State Permits Branch
<input type="checkbox"/>	Solid Waste

CSN 18-0094

Facility Name Crittenden County Sanitary Landfill

Invoice Mailing Address 1300 West Barton Avenue

West Memphis, Arkansas 72301

<input checked="" type="checkbox"/>	Initial
<input type="checkbox"/>	Modification
<input type="checkbox"/>	Annual

Permit Number 1994-AOP-R0

Permit Description Title 5

Permit Fee Code A

Amount Due \$ 1046 $54.7 * 19.12 = 1045.87$

Engineer David Triplett

Paid? ☐ No ☐ Yes Check #

Comments: Air Permit Fee Calculation

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Crittenden County currently owns and operates a municipal solid waste landfill located at 1299 Kuhn Road in West Memphis, Arkansas. This facility occupies approximately 100 acres consisting of a Class I landfill area, a Class IV landfill area, a composting area, and ancillary facilities. This facility is required to obtain a Title V Operating Air Permit under the provisions of 40 CFR Part 60 Subpart WWW - *Standards of Performance for Municipal Solid Waste Landfills*. This will be the initial air permitting action for this existing facility.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Suzanne Carswell, Information Officer. Citizens desiring technical information concerning the application or permit should contact David Triplett, Engineer. Both Suzanne Carswell and David Triplett can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the West Memphis Public Library located at Avalon and Olive Streets in West Memphis, Arkansas 72301. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Suzanne Carswell. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Richard A. Weiss
Interim Director