

## STATEMENT OF BASIS

for the issuance of Draft Air Permit # 2069-A

**1. PERMITTING AUTHORITY:**

Arkansas Department of Environmental Quality  
8001 National Drive  
Post Office Box 8913  
Little Rock, Arkansas 72219-8913

**2. APPLICANT:**

IESI-AR Landfill Corp. dba Cherokee Sanitary Landfill  
300 Landfill Road  
Cherokee Village, Arkansas 72529

**3. PERMIT WRITER: Paul Osmon**

**4. PROCESS DESCRIPTION AND NAICS CODE:**

NAICS Description: Solid Waste Landfill  
NAICS Code: 562212

**5. SUBMITTALS: June 16, 2004**

**6. REVIEWER'S NOTES:**

Cherokee Sanitary Landfill has completed Tier 2 testing to avoid the requirements to install a landfill gas gathering system and flare. The field measured NMOC concentrations for the Cherokee Landfill by this Tier 2 testing is 456.6 ppmv. 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. 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. 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.

**7. COMPLIANCE STATUS:**

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

The permittee has applied for a minor source air permit because recent additions to their solid waste permit makes the facility subject to NSPS Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills.

**8. APPLICABLE REGULATIONS:**

**PSD Applicability**

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera?)	Y/N	N
Has this facility undergone PSD review in the past?	Y/N	Permit# N
Is this facility categorized as a major source for PSD?	Y/N	N
\$ 100 tpy and on the list of 28 (100 tpy)?	Y/N	N
\$ 250 tpy all other	Y/N	N

**PSD Netting**

Was netting performed to avoid PSD review in this permit? Y/N N

**Source and Pollutant Specific Regulatory Applicability**

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
SN-1	VOC (NMOC)	NSPS

**9. EMISSION CHANGES:**

The following table summarizes plant wide emission changes associated with this permitting action.

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	No Previous Permit	Air Permit 2069-A	Change
VOC	0	18.4	18.4
Total HAP	0	5.75	5.75
1,1,2,2-tetrachloroethane	0	0.121	0.121
1.1-dichloroethane	0	0.143	0.143

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	No Previous Permit	Air Permit 2069-A	Change
Toluene	0	2.183	2.183
Vinyl Chloride	0	0.276	0.276

**10. MODELING:**

**Criteria Pollutants**

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

**11. 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 deemed PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
1,1,2,2-tetrachloroethane	6.9	0.759	0.027	Y
1.1-dichloroethane	405	44.55	0.033	Y
Toluene	188	20.68	0.500	Y
Vinyl Chloride	13	1.43	0.063	Y

**12. CALCULATIONS:**

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type ( if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
SN-1	EPA Landfill Emission Model Version 2.01	varies	None	NA	

**13. TESTING REQUIREMENTS:**

This permit requires stack testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
SN-1	NMOC	Tier II	5 years*	NSPS Requirement
* - previous test completed August, 2000: next test due before September 1, 2005.				

**14. MONITORING OR CEMS**

The permittee must monitor the following parameters with CEMs or other monitoring equipment (temperature, pressure differential, etc), frequency of recording and the need for records included in any annual, semiannual or other reports.

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency*	Report (Y/N)**
No monitoring or CEMS in this permit.				

\* Indicate frequency of recording required for the parameter (Continuously, hourly, daily, etc.)

\*\* Indicates whether the parameter needs to be included in reports.

**15. RECORD KEEPING REQUIREMENTS**

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
SN-1	Waste disposed in landfill	7,224,676 Cubic yards (4,063,889 million tons)*	Monthly	N
* after 1/1/ 2004				

\* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc.)

\*\* Indicates whether the item needs to be included in reports

**16. OPACITY**

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
No opacity limits in this permit.			

**17. DELETED CONDITIONS:**

The previous permit contained the following deleted Specific Conditions.

Former SC	Justification for removal
Initial permit	

**18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS**

Permit #: 2069-A  
AFIN: 25-00028  
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List all active permits voided/superseded/subsumed by issuance of this permit for this facility.

Permit #
Initial permit

**19. CONCURRENCE BY:**

The following supervisor concurs with the permitting decision:

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Thomas Rheume, P.E.