

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1781-AOP-R5 AFIN: 60-01071

- 1. PERMITTING AUTHORITY:  
Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317
- 2. APPLICANT:  
City of Little Rock - Solid Waste Facility  
10803 Ironton Cutoff Rd.  
Little Rock, Arkansas 72206
- 3. PERMIT WRITER:  
Amanda Leamons
- 4. NAICS DESCRIPTION AND CODE:  
NAICS Description: Solid Waste Landfill  
NAICS Code: 562212
- 5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

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
1/21/2025	Renewal with Modification	Increased landfill emissions based on updated Landgem calculations, Added SN-14 back into the permit, removed SN-17; Increased gasoline throughput for SN-13 tank; added two 500 gallon used oil tanks to the IA list.

6. REVIEWER'S NOTES:

Little Rock Solid Waste Facility (LRSWF) operates a municipal solid waste landfill located at 10803 Ironton Cutoff Road, approximately 0.5 miles south of the Dixon Road and Arch Street intersection, in Little Rock, Pulaski County, Arkansas 72206. With this permit renewal the following changes have been permitted:

- Increased emission limits for SN-08, SN-09, SN-10, SN-11, and SN-13 based on revised emission calculations;

- Revised Plantwide Condition 8 to include a maximum annual limit on the waste accepted at the landfill and a provision to update the air permit with any issuance of a new/updated solid waste permit;
- Increased the gasoline throughput limit for SN-13 from 50,000 gal/yr to 60,000 gal/yr;
- Removed SN-17 emergency generator which was never installed;
- Re-inclusion of SN-14 the emergency generator that was to be replaced by SN-17, previously removed from the permit but never removed from the facility;
- Changed SN-19 to non-emergency status given the engine use in previous years exceeded the allowable use limits for it to continue to be classified as an emergency engine;
- Added two 500-gallon used oil tanks to list of insignificant activities;
- Removed 40 C.F.R. Part 60, Subpart WWW requirements from the conditions because the facility is now subject to a more stringent state plan;
- Revised the 8 CAR pt. 41, Subpart 16 requirements in the plantwide conditions to include the specific language from 40 C.F.R. Part 60, Subpart Cf to the specific conditions;
- Updated to 40 C.F.R. Part 63, Subpart AAAA requirements in the plantwide conditions; and
- Updated the permit formatting to adhere to the current permit template and recent codification of the state air rules.

Due to the above listed revisions the facility's permitted annual emissions are increasing by 0.7 ton of PM, 2 tons of PM<sub>10</sub>, 1 ton of SO<sub>2</sub>, 5.2 tons of VOC, 10.7 tons of CO, 4.2 tons of NO<sub>x</sub>, 3.18 tons of total combined HAPs. While the facility's permitted annual emissions are decreasing by 6.99 tons of total chargeable non-criteria air pollutants (NCAPs) which includes emissions of CFCs, H<sub>2</sub>S, and acetone.

## 7. COMPLIANCE STATUS:

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

There are currently 2 pending CAOs in house.

CAO-25-0030 covers Air and Land compliance issues. Below are the air issues:

- 17 instances of positive pressure during the inspection period. Failed to operate the collection system w/negative pressure.
- 16 instances oxygen levels being above 5% during inspection period. Failed to operate the collection system w/an oxygen level below 5%.
- 4th Quarter 2024 report was not included for surface monitoring during inspection. Testing guidelines were not included.

- Because the permittee failed to provide corrective actions for the monitoring exceedances as specified in 40 CFR 60.755, the monitoring exceedances are considered violations of the operational requirements.
- The permittee failed to provide corrective actions in accordance with this schedule of action for the monitoring exceedances listed in PC-10.g.
- Failed to provide accurate reports of all monitoring exceedances. The following exceedances were not reported:
  - 2 out of 16 instances where oxygen level was >5%
  - 14/17 instances where wellheads show positive pressure
  - 6/6 instances where O<sub>2</sub> & pressure were not monitored
  - 4/13 instances where the collection system was not operating in excess of 5 days
- Failure to comply with operating, compliance, or monitoring requirements for a gas collection and control system at a municipal solid waste landfill. The permittee failed to meet the operating compliance, and monitoring requirements of Rule 19, Chapter 17. Respondent failed to demonstrate methane concentration measurements.
- Failure to comply with corrective action or corresponding timeline requirements. Respondent failed to provide an update on the corrective action plan.
- SN-18 failed to maintain records of operating hours. SN-18 replaced SN-15 in July of 2022. Failed to keep monthly usage records from July 2022 to January 2023.
- Respondent failed to ensure that SN-19 did not exceed the Subpart IIII 100 hour annual limit in 2023 (380.7 hours).
- Failure to comply with the initial or annual performance test report provisions: Respondent failed to provide the initial report due within 180 days or by 3/1/24. Protocol for testing or update has not been received.
- Respondent failed to provide accurate SAM reports.
- Respondent failed to provide initial deviation reports and 5-day reports.
- Respondent failed to provide accurate ACC reports.

CAO-26-0027 covers air compliance issues for an air inspection that was conducted with EPA in August of 2025. This CAO is in very early stages and the areas of concern from the inspection report are summarized in the following list.

8/5/25 Inspection Areas of Concern:

- The permittee exceeded its operation limits in 2024 by using SN-19 for non-emergency operations. The permittee thus failed to maintain SN-19 status of emergency engine under 40 CFR Part 60 IIII and must now meet all requirements for non-emergency engines.

- Information gathered from the Annual Engineering Inspection Reports (AEIR) submitted by FTN-Associates and Terracon for 2017 through 2024, and the facility 03/31/25 remediation plan show that the facility has started filling in Cell 9 in the airspace above Cells 1, 2, 4 and 5. Additional wells were due to be installed in 2023 for Cell 4, 2024 for Cell 5 East, and 2025 for Cell 5 West. According to the AEIR provided for 2017 through 2024 and the last remediation plan for the Explosive Gas perimeter monitoring of 03/31/25, the permittee failed to install scheduled wells in 2023 (3) and 2024 (2).
- The leachate collection system is a component of the GCCS, so all leachate gas must be routed to the collection system. However, field monitoring during the inspection showed high LEL emissions at and around the leachate pump houses, with readings up to 14,000ppm. The permittee failed to maintain methane concentration below 500 ppm at and around the leachate pump houses. The permittee failed to route all gas emissions to the flare.
- The permittee failed to prevent off-site migration of subsurface gas.
- The flare was not operating at the time of inspection. A propane spark plugs ignitor starts the pilot flame (tank located nearby). A thermocouple and valve are preventing physical bypass of the gas through the flare. During the inspection period and inspection itself, the following discrepancies were observed:
  - Presence of the flame can only be checked visually
  - The flare was not operating at the time of visit.
  - Information provided by the permittee shows that the flare was restarted 49 times between 07/05/24 and 06/29/25.
  - It has taken up to 12 days at times to restart the flare.
  - During the inspection, leaks were observed at connections (valves) and stack while the flare was not operating.
  - The permittee stated that the Startup, Shutdown and Malfunction occurrences other than those due to technical issues are due to low landfill gas flow.
- The LGCC Flare SSM report shows that the facility has experienced many restarts of the control system for periods exceeding 1 hour before repairs were initiated for up to 12 days at a time. The permittee failed to show that the collection and control system did not contribute to venting gas to the atmosphere when the flare was down.
- A device that records flow to the flare and bypass of the flare (if applicable). The owner or operator must install, calibrate, and maintain a gas flow rate measuring device that records the flow to the control device at least every 15 minutes. The permittee failed to provide calibration records, and to install a flow measuring device capable of recording the flow every 15 minutes.
- The permittee failed to operate with a functioning control system (flare) for up to 12 days as required by 40 CFR §60.34f(e).

- The permittee failed to operate the system with negative pressure at wellheads 8 and 10 during the inspection period. The permittee exceeded gauge pressure and oxygen concentration limits for a period exceeding 120 days. The permittee is required to send an updated corrective action and timeline report within 30 days of receiving this report. Per §63.1960 (a)(3)(C), If corrective action is expected to take longer than 120 days to complete after the initial exceedance, the permittee must submit the root cause analysis, corrective action analysis, and corresponding implementation timeline to the Administrator, according to § 63.1981(j). The permittee must keep records according to § 63.1983(e)(5). The permittee failed to notify the OAQ of positive pressure events within the time allotted.
- The 4th Quarter 2024 Methane Surface Monitoring did not provide coordinates of each reading so compliance cannot be determined. The permittee failed to determine latitude and longitude and thus failed to conduct one valid Methane Surface Monitoring for 2024. The permittee must record the latitude and longitude coordinates of each exceedance using an instrument with an accuracy of at least 4 meters. The coordinates must be in decimal degrees with at least five decimal places. The permittee failed to use proper equipment for the 4th Quarter 2024 and thus failed to provide valid testing for that quarter due to the lack of GPS coordinates.
- The 1st Quarter 2025 Methane Surface Monitoring show areas where the surface methane emissions were more than 500ppm. The area was retested but the coordinates do not match the observed points of exceedance. The permittee exceeded its limits for the 500ppm surface methane quarterly monitoring during the 03/28/25 testing and failed to retest at the same locations. The permittee failed to retest the location of exceedances with the accuracy of at least 4 meters.
- Any location that initially showed an exceedance but has a methane concentration of less than 500 parts per million methane above background at the 10-day re-monitoring specified in paragraph (c)(4)(ii) or (iii) of 60.36f must be re-monitored 1 month from the initial exceedance. If the 1-month re-monitoring shows a concentration of less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month re-monitoring shows an exceedance, the actions specified in paragraph (c)(4)(iii) or (v) must be taken. The 10-day retest was conducted 03/31/25 and the report did not show any exceedances. The 1-month follow-up was not conducted. Notwithstanding the fact that the retest is invalidated due to testing locations, the permittee failed to conduct the one month follow-up testing as prescribed by this section.

8. PSD/GHG APPLICABILITY:

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

If yes, were GHG emission increases significant? NA

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

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

If yes for 8(b), 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), methane	NSPS Subpart Cf
Facility	HAPs/NMOC, methane	NESHAP Subpart AAAA
Facility	Asbestos	40 CFR Part 61, Subpart M
SN-13	HAPs	40 CFR Part 63, Subpart CCCCC
SN-14, SN-18, SN-19, SN-20	HAPs	NESHAP Subpart ZZZZ
SN-19 and SN-20	NO <sub>x</sub> , CO, VOC, PM	NESHAP Subpart IIII
SN-14 and SN-18	NO <sub>x</sub> , CO, VOC, PM	NSPS Subpart JJJJ

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
No unconstructed sources are included in the permit at this time				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? Y

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any 8 CAR pt. 40 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? Y

If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
Facility	40 CFR Part 60, Subpart Cc	Constructed after compliance date cut-off.
Facility	40 C.F.R. Part 60, Subpart WWW	Landfill is now subject to a more stringent state rule that incorporates 40 C.F.R. Part 60, Subpart Cf.
Facility	40 C.F.R. Part 60, Subpart XXX	Constructed before applicable trigger date of 7/17/14.
VOL Tanks	40 CFR Part 60, Subpart Kb	Each tank size is below threshold of 19,815 gallons.

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source

level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
SN-11	VOC/NMOC/HAPs	Required for control by NSPS Cf and NESHAP AAAA

13. EMISSION CHANGES AND FEE CALCULATION:  
See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the 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?
Acrolein	0.23	0.0253	0.002	Y
Mercury	0.01	0.0011	0.000006	Y
Total POM/PAH	0.2	0.022	0.00036	Y

c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards Yes

If exempt, explain: NESHAP AAAA

## 15. CALCULATIONS:

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
08 & 10	NMOC on-site sample	EPA LandGEM computer modeling	None	NA	25% uncontrolled 75% routed to Flare
09	AP-42 Section 13.2.2	PM = 1.887 lb/VMT* PM <sub>10</sub> = 0.509 lb/VMT* 6.4% silt content 50,000 miles/yr 20.83 tons MVW	Water suppression as necessary	75%	
11	LandGEM AP-42 Table 2.4-5	Varies by Pollutant POC: 38 lb <sub>NOx</sub> /MMdscf <sub>Methane</sub> 58 lb <sub>CO</sub> /MMdscf <sub>Methane</sub> 17 lb <sub>PM/PM10</sub> /MMdscf <sub>Methane</sub> 4.1 lb <sub>VOC</sub> /MMdscf <sub>Methane</sub> 1.8824 lb <sub>SO2</sub> /lb <sub>gas</sub> Flared	Flare	98.0%	Treats 75% of landfill emissions
13	TANKS	5,000 gal tank 11 turnovers/yr 1.3 lb <sub>VOC</sub> /hr 1.31 ton <sub>VOC</sub> /yr	None	NA	Thru-put limited to 50,000gal/yr
14	AP-42 3.2-3	0.0194 lb <sub>PM/PM10</sub> /MMBTU 0.0296 lb <sub>VOC</sub> / MMBTU 2.21 lb <sub>NOx</sub> / MMBTU 3.72 lb <sub>CO</sub> /MMBTU 0.000588 lb <sub>SO2</sub> /MMBTU	None	NA	
18	AP-42 3.2-2	0.00991 lb <sub>PM/PM10</sub> /MMBTU 0.118 lb <sub>VOC</sub> / MMBTU 4.08 lb <sub>NOx</sub> / MMBTU 0.557 lb <sub>CO</sub> /MMBTU 0.000588 lb <sub>SO2</sub> /MMBTU	None	NA	
19	AP-42 3.3-2 & 3	0.0022 lb <sub>PM/PM10</sub> /MMBTU 0.00247 lb <sub>VOC</sub> / MMBTU 0.031 lb <sub>NOx</sub> / MMBTU 0.00668 lb <sub>CO</sub> /MMBTU 0.00205 lb <sub>SO2</sub> /MMBTU	None	NA	
20	AP-42 3.3-2 & 3	0.0022 lb <sub>PM/PM10</sub> /MMBTU 0.00247 lb <sub>VOC</sub> / MMBTU 0.031 lb <sub>NOx</sub> / MMBTU 0.00668 lb <sub>CO</sub> /MMBTU 0.00205 lb <sub>SO2</sub> /MMBTU	None	NA	

## 16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
Facility	methane	Section 8.3.1 of EPA Method 21 of Appendix A-7 of 40 C.F.R Part 60 *5-10 cm from ground*	Quarterly and Re-test exceedances (See PWC 41)	40 C.F.R. §§ 63.1958, 63.1960

## 17. 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)
Facility GCCS	Pressure at each Wellhead	Pressure Gauge (PWC 44)	Monthly	Y, Exceedances
	O <sub>2</sub> or N <sub>2</sub> Concentration at each Wellhead	O <sub>2</sub> : Oxygen Meter Method 3A or 3C  N <sub>2</sub> : Method 3C	Monthly	Y, Exceedances
	Temperature at each Wellhead	Temperature Gauge (PWC 44.c.)	Monthly	Y, Exceedances
	Surface methane concentrations	organic vapor analyzer, flame ionization detector, or other portable monitor (PWC 41 & 42)	Quarterly & re-monitor on schedule at exceedances	Y, Exceedances
	If temp. exceeds 145°F at a well – Conduct Enhanced Monitoring (See PWC 44.d.) oxidation events, O <sub>2</sub> , Temperature, methane, CO	Visual observations of oxidation events, O <sub>2</sub> : Method 3A or 3C, Monitor Temperature at wellhead and every 10 vert. feet per PWC 44.e, methane: Method 21, Monitor CO: Method 10 of Appendix A-4 to Part 60	Weekly following exceedance (PWC 44.d.)	Y
11 Flare for GCCS	Presence of Flame	Heat Sensing Device (UV beam sensor or thermocouple)	Continuous	Y, Exceedances

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
	Gas Flow to Flare & Bypass of Flare	Gas flow meter & Valve closure Car-Seal or Lock & key style	Continuous	Y, Exceedances
14, 18, 19, 20	Hours of Operation	Non-resettable hour meter	Monthly	Y

18. 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 & Landfill GCCS	Total in-place Solid Waste	7.75 MM tons design capacity (PWCs 8 & 80)	Monthly	Y
	Solid Waste accepted	120,999 tons/12-months (PWCs 8 & 80)	Monthly	Y
	Asbestos-containing or non-degradable waste: nature, date, quantity received & location	n/a – See PWC 24	On-going	N
	Methane Surface Testing	Less than 500 ppm (PWC 32)	Quarterly	Y
	Initial design capacity report, amended design capacity report, NMOC emission report, GCCS design plan, revised GCCS design plan, Equipment Removal Report, SAM report, Initial perf. test report, Corrective action & timeline, 24-hour temp. report (>170°F)	n/a – See PWCs 55 & 80	On-going/ SAM semi-annually	N/ SAM-Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Facility & Landfill GCCS	Max gas generation flow rate; Density of wells, horz. collectors, surf. collectors, or other gas extraction devices; All perf test data for the flare SN-11; Continuous records of pilot flame/flame monitoring, all records of periods when flame was absent; Bypass records; Site-specific treatment monitoring plan.	n/a- See PWCs 56.b, 72, & 80	Keep for the life of control system	Y, initial plans and exceedances
	Periods when collection system or control device is not operating;	n/a-See PWCs 56.c.iii & 80	Upon on each instance	Y
	Failure records	date, time, and duration of each failure and the cause of such events (PWC 56.c.v.A)	Upon on each instance	Y
	Failure to meet applicable standard	Record and retain a list of affected sources or equipment (PWC 56.c.v.B)	Upon on each instance	Y
	corrective actions taken	n/a- See PWC 56.c.v.C	Upon on each instance	Y
	Performance evaluation plan revisions – Keep previous versions of the performance evaluation plan on record for 5 years after each revision to the plan - This includes a corrective action plan.	n/a- See PWC 56.c.vi	When updated, Keep active plans for the life of the system	N
Facility & Landfill GCCS	Plot map showing each existing and planned collector in the system, providing a unique identification location label for each collector. Installation date and location of all newly installed collectors; documentation of the nature, date of deposition, amount, and location of	n/a- See PWC 56.d & 80 Submit design plans to permits for review 90 days prior to changing per PWCs 55 & 69.	When updated, Keep for the life of the system	Y, initially and as updated

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	<p>asbestos-containing or nondegradable waste excluded from collection; any nonproductive areas excluded from collection as provided</p>			
<p>Facility &amp; Landfill GCCS Cont'd</p>	<p>All GCCS exceedances of the operational standards in § 63.1958, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.</p> <p>wellhead temperature monitoring exceedances, wellhead nitrogen level or oxygen level exceedances, all enhanced monitoring activities.</p> <p>If 24-hour high temperature report is required, keep a record of the email transmission.</p> <p>Root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed, for action(s) not already completed - a schedule for implementation, including proposed commencement and completion dates, and a copy of any comments or final approval on the corrective action analysis or schedule from the Administrator.</p>	<p>n/a- See PWCs 56.e &amp; 80</p>	<p>Upon on each instance</p>	<p>Y</p>
	<p>GCCS monitoring data for all parameters measured</p>	<p>n/a- See PWCs 56.f &amp; 80</p>	<p>Continuous (15 min)</p>	<p>N</p>

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
11	Inspections of the bypass line valve: a car-seal or a lock-and-key type configuration.	A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line. (PWCs 56.c.i & 80)	Monthly	N
13	Gasoline throughput	9,999 gal/month 60,000 gallons/12 months	Monthly	Y
14 and 18	Hours of operation	Total: 500 hr/yr Non-emergency*: 50/100 hr/yr	Monthly	Y
	Performed Maintenance	According to Manufacturer's Written Instructions	Monthly	N
	Certification	Required Emission Standards	Monthly	N
19	Hours of operation	Total: 500 hr/yr	Monthly	Y
	Performed Maintenance	According to Manufacturer's Written Instructions	Monthly	N
	Certification	Required Emission Standards	Monthly	N
20	Hours of operation	Total: 500 hr/yr Non-emergency*: 50/100 hr/yr	Monthly	Y
	Performed Maintenance	According to Manufacturer's Written Instructions	Monthly	N
	Certification	Required Emission Standards	Monthly	N

*\*Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing.*

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
11	0%	40 C.F.R. § 63.11	Method 22, Upon Inspection
14 and 18	5%	Department Guidance	Inspector Observation
19 and 20	20%	Rule 19.503 and 40 C.F.R. § 52 Subpart E	Inspector observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
PWCs 10, 25, & 28	Subpart WWW is no longer applicable to the permit.

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
5,000 gallon Diesel Storage Tank	A-3			0.01			0.01	0.01
2 -500 gallon Used Oil Storage Tanks	A-3			<0.02			0.01	0.01
1,000 gallon Used Oil Tank	A-3			0.01			0.01	0.01
<i>Total for A-3 activities</i>				0.04			0.03	0.03
15,000 gallon Diesel Storage Tank	A-13			0.01			0.01	0.01
Leachate Pond	A-13			0.02			<0.001	0.001
<i>Total for A-13 activities</i>				0.03			0.011	0.011

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1781-AOP-R4

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-16

Facility Name: City of Little Rock - Solid Waste Facility  
 Permit Number: 1781-AOP-R5  
 AFIN: 60-01071

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	100
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	4.11
Initial Title V Permit Fee Chargeable Emissions (tpy)	

*HAPs not included in VOC or PM: Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

*Air Contaminants: All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensable PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		51	51.7	0.7	0.7	51.7
PM <sub>10</sub>		16.6	18.6	2		
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		2.5	3.5	1	1	3.5
VOC		10.8	16	5.2	5.2	16
CO		12.2	22.9	10.7		
NO <sub>x</sub>		11.2	15.4	4.2	4.2	15.4
Total HAPs	<input type="checkbox"/>	7.64	10.82	3.18		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Total Chargeable NCAPs	<input checked="" type="checkbox"/>	9.6	2.61	-6.99	-6.99	2.61