

**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 36397**

I. INTRODUCTION

This Class I Air Quality Control Permit is for the operation of a Municipal Solid Waste Landfill. The La Paz County Regional Landfill (LPCL) is owned by La Paz County and operated by BFI Waste Systems of North America, Inc. and Allied Waste Company. This is a renewal of Permit # 1000819.

A. Company Information

Facility Name: La Paz County Regional Landfill

Facility Address: 26999 Hwy 95, Milepost 128
Parker, AZ 85344, La Paz County

Mailing Address: 1300 Arizona Ave., Suite A
Parker, AZ 85344, La Paz County

B. Background

This source is a Municipal Solid Waste Landfill.

C. Attainment Classification

La Paz County Regional Landfill is in an Attainment Area with respect to all the criteria pollutants.

II. FACILITY DESCRIPTION

A. Process Description

The LPCL has been designed to exceed a design capacity of 2.5 million cubic meters and 2.5 million megagrams. LPCL is an active solid waste landfill which conditionally accepts the following residential and commercial wastes:

- Typical Residential Waste – Household garbage, yard clippings and other green waste;
- White Goods - Large appliances that are void of Chlorinated fluorocarbons (CFC's);
- Construction and Demolition Debris - Construction and demolition debris (i.e., waste building materials, packaging and rubble from construction, remodeling, and repair and demolition operation of pavement, houses, buildings, and structures);

- Tires - The landfill segregates waste tires detected in the solid waste and temporarily stores the tires until they are shipped off-site.
- Wastewater Treatment Plant Sewage Sludge - Conditionally accepted. The LPCL requires the generator, or an agent for the generator, to provide documentation that adequately profiles the wastes. Waste only will be accepted if it passes the paint filter test (USEPA Test Method 9095) and the generator has provided documentation that the waste is not hazardous waste. LPCL retains the option to use sludge as daily cover material provided it meets the required performance standards and receives ADEQ approval;
- Asbestos - The acceptance and disposal of friable asbestos and non-friable asbestos containing materials at the GWRF is performed according to 40 CFR §61, Subpart M, National Emission Standards for Asbestos §61.149 (Standard for asbestos mills), §61.150 (Standard for demolition, renovation, fabricating and manufacturing), §61.154 (Standard for active waste disposal sites), and §61.155 (Standard for asbestos conversion operations).
- Other non-hazardous wastes – May include liquid or solid industrial wastes.

The LPCL is open six days a week. Business hours are 7.00 am to 3.30 pm, Monday through Friday, and 8.00 am to 12.00 pm on Saturdays. The LPCL operates 271 days per year, including Saturdays.

B. Air Pollution Control Equipment:

Dust control measures such as the water truck are used to mitigate dust emissions at the site. Additionally, the water tank is used several times per day. The water truck is filled and moves at slow speeds across the site, spraying a wide area with water to reduce particulate emissions.

III. COMPLIANCE HISTORY

La Paz County Regional Landfill has been in compliance with the permit conditions.

IV. EMISSIONS

The uncontrolled emissions for years 2005 and 2011 are given below.

Pollutant	Emissions (Yr 2005)	Emissions (Yr 2011)
	Ton/year	Ton/year
NMOC	27	37
PM	7.81	13.68
PM ₁₀	7.81	13.68
NO _x	24.68	24.68
SO ₂	1.63	1.63

Pollutant	Emissions (Yr 2005)	Emissions (Yr 2011)
	Ton/year	Ton/year
VOC	13.31	18.64
CO	14.88	14.88
HAPs	1.15	1.31

The emissions are based on 3% annual disposal growth rate. The LPCL is not expected to exceed the 50 Mg/yr threshold during the current permit period. The NMOC emissions at the end of the permit period will be approximately 37 Mg/yr.

The Permittee must recalculate the emissions when the annual disposal growth rate is greater than 3%. When the landfill approaches the 50 Mg/yr threshold, it will implement a landfill gas collection system.

V. APPLICABLE REGULATIONS

The applicable regulations were identified by the Department as part of the permitting process. If necessary, the source is required to list any additional regulations that may be applicable.

Table 2: Verification of Applicable Regulations

Unit	Date of Construction / Installation	Control Device	Rule	Verification
MSW Landfill	N/A	Required when NMOC > 50 Mg/yr	40 CFR §60, Subpart WWW, 40 CFR §63 Subpart AAAA	40 CFR §60 Subpart WWW regulates emissions of landfill gas from MSW landfills. National Emission Standard for Hazardous Air Pollutants (40 CFR §63 Subpart AAAA) requires a Startup, Shutdown and Malfunction (SSM) plan to be in place when the facility has a collection and control system in place.
Generators	N/A	N/A	R18-2-719	This standard applies to all stationary rotating machinery
Fugitive dust sources	N/A	Water and other reasonable precautions.	Article 6 of the A.A.C.	These standards are applicable to all fugitive dust sources.
Asbestos Handling	N/A	N/A	40 CFR §61.154 (Subpart M)	Standards for disposal of asbestos-containing waste

Table 2: Verification of Applicable Regulations.....Continued

Unit	Date of Construction / Installation	Control Device	Rule	Verification
Mobile sources	N/A	Water Sprays/Water Truck for dust control	Article 8 of the A.A.C.	Opacity requirements for smoke and dust for mobile sources (construction equipment, etc.).
Stratospheric Ozone	N/A	N/A	40 CFR §82, Subpart F	Requirements for control of ozone-depleting substances
Safety Kleen Parts Washer	N/A	N/A	A.A.C. R18-2-730	Standards of Performance for Unclassified Sources

VI. PREVIOUS PERMITS

Table 3: Previous Permit Information

Date of Permit Issuance	Permit Number	Application Basis
September 6, 2000	1000819	Operating Permit

VII. PREVIOUS PERMIT CONDITIONS

This operating permit was issued to La Paz County Regional Landfill on September 6, 2000, for the operation of a Municipal Solid Waste Landfill.

Table 4: Permit # 1000819

Condition No.	Determination				Comments
	Revise	Keep	Delete	Stream-line	
Att. A.	x				General Provisions - Revised to represent most recent permitting language.
Att B.I.	x				Facility Wide Requirements - Revised to represent most recent permitting language.
Att B.II	x				NMOC Compounds
Att B.III	x				Collection and Control System Requirements
Att B.IV	x				Asbestos Requirements
Att B.V	x				Fugitive Dust Requirements - Revised to represent most recent permitting language.
Att B.VI	x				Stationary Rotating Machinery Requirements

Table 4: Permit # 1000819.....Continued

Condition No.	Determination				Comments
	Revise	Keep	Delete	Stream-line	
Att B.VII	x				Mobile Sources Requirements - Revised to represent most recent permitting language.
Att B.VIII	x				Stratospheric Ozone Requirements
Att B.IX	x				Other Periodic Activities Requirements
Att C	x				Equipment List
Att D				x	Reporting Format

VIII. MONITORING AND RECORDKEEPING REQUIREMENTS

A. NMOC Emissions

1. Monitoring Requirements

The permit contains requirements for calculating and monitoring NMOC emissions on an annual basis, per 40 CFR §60, Subpart WWW. The Permittee is required to keep track of NMOC emissions in order to determine when and if the 50 Mg/yr threshold will be reached. When the threshold is reached, then a collection and control system is required, and additional monitoring requirements are triggered. It is anticipated that PDL will not trigger the additional requirements until the end of the permit term; however, they are included in the permit.

CAM requirements do not apply to this facility, because the facility does not currently have any kind of pollution control device, and pre-control emissions are below the major source threshold.

B. Stationary Rotating Machinery

1. Monitoring Requirements

Opacity

The permit requires bi-weekly EPA Reference Method 9 of stationary rotating machinery emissions by a certified Method 9 observer.

2. Recordkeeping Requirements

The Permittee is required to record the emission point being observed, date, time and the results of all observations made, as well as the name of

the observer who conducted the test. In the event of opacity going beyond the limit, the Permittee will keep a record of the corrective action taken to bring the opacity below the standard.

C. Solvent Cleaning Activities

1. Monitoring Requirements

Opacity

The permit specifies opacity limitations for the various point sources located within the facility. Visible emission surveys are to be performed by a certified Method 9 observer bi-weekly.

2. Record Keeping Requirements

Opacity

The Permittee is required to record the emission point being observed, location of the observer, date, time and the results of all Method 9 observation made bi-weekly, as well as the name of the observer who conducted the test. In the event of opacity going beyond the limit, the Permittee will keep a record of the corrective action taken to bring the opacity below the standard.

D. Fugitive Dust

1. Monitoring Requirements

Opacity

The permit requires bi-weekly EPA Reference Method 9 of fugitive emissions by a certified Method 9 observer.

2. Recordkeeping Requirements

The Permittee is required to record the emission point being observed, date, time and the results of all observations made, as well as the name of the observer who conducted the test. In the event of opacity going beyond the limit, the Permittee will keep a record of the corrective action taken to bring the opacity below the standard.

E. Asbestos

1. Monitoring Requirements

The Permittee is required to monitor the waste that is being accepted for all asbestos-containing waste material.

2. Recordkeeping Requirements

The Permittee is required to maintain shipment records of all asbestos containing materials that enter the landfill.

F. Ozone Depleting Materials

Monitoring Requirements

The Permittee is required to monitor the amount of ozone depleting material that enters the landfill area and dispose of it in the proper manner specified in Attachment "B" of the permit.

IX. INSIGNIFICANT ACTIVITIES

The applicant has requested the following activities to be deemed as "insignificant". According to A.A.C. R18-2-101.57, for an activity to be deemed "insignificant", there should be no applicable requirement for the activity. This was the basis used to determine if the activities in the following list qualify as an "insignificant" activity under Arizona law.

Table 5: Insignificant Activities

Activity	Insignificant Yes/No	Reason and Applicable Regulation
2 septic ponds	Yes	A.A.C. R18-2-101.57
IC engines driven air compressors, and pressure washer	No	A.A.C. R-18-2-719 applicable.
Landscaping, building, maintenance or janitorial activities	Yes	A.A.C. R18-2-101.57.a
Hand-held or manually operated tools or equipment for cutting, buffing, polishing, carving, drilling, machining, sanding, sawing and grinding.	Yes	A.A.C. R18-2-101.57.f
Brazing or welding equipment	Yes	A.A.C. R18-2-101.57.j
Gasoline storage tanks with capacity of 10,000 gallons or less	Yes	A.A.C. R18-2-101.57.b
Diesel and fuel oil storage tanks with capacity of 40,000 gallons or less	Yes	A.A.C. R18-2-101.57.c

X. LIST OF ABBREVIATIONS

A.A.C.....	Arizona Administrative Code
CFR.....	Code of Federal Regulations
CO	Carbon Monoxide
EPA.....	Environmental Protection Agency
HAPs	Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS.....	New Source Performance Standard
PM.....	Particulate Matter
PM ₁₀	Particulate Matter Less than 10 Microns
PTE.....	Potential to Emit
SO ₂	Sulfur Dioxide
VOC.....	Volatile Organic Compounds
Yr.....	Year