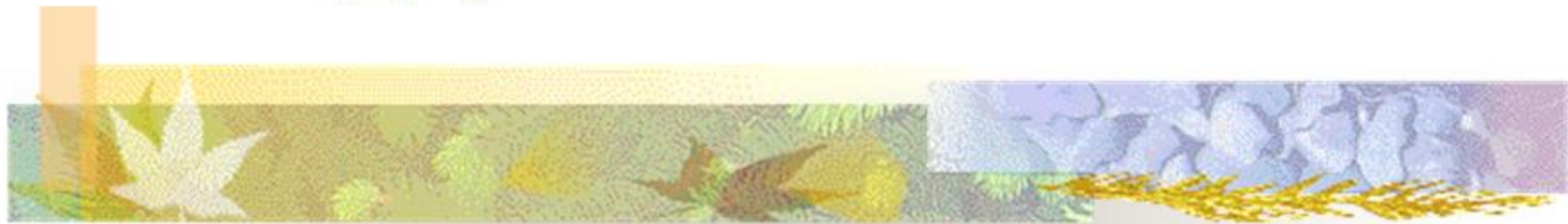


# Do these Air Requirements Apply to this MSWLF?



Katie Walters

Air Pollution Control Division  
Stationary Sources Enforcement



## Brief Biography

- B.S. Environmental Science, Virginia Tech
- M.S. Atmospheric Science/Atmospheric Chemistry, Colorado State University
- Started working at the Division in August 2003
- Responsible for reviewing all Landfill reports and conducting inspections at landfills throughout the State.



# Introduction/Topics covered

- Overview of permitting and regulations
  - Federal Regulations
    - NSPS Subpart Cc and WWWW
    - MACT Subpart AAAAA
  - APEN
  - Permitting
- Inspection Process
  - What to expect from an inspector

# Landfills = Air Quality Issues?

- Federal – Regulate the gas (methane, organic compounds, Hazardous Air Pollutants) coming from the Landfill
  - Based on an average
- State – Regulate the dust produced by the trucks and earthmoving equipment
- Unique situation in Colorado





# Federal Regulations applicable to MSWLFs

- NSPS Subparts Cc and WWW:

- 40 CFR Part 60

- Cc = construction before May 30, 1991 and landfilling anytime since November 8, 1987.
    - WWW = construction and landfilling began May 30, 1991 or after.



# NSPS Subpart Cc

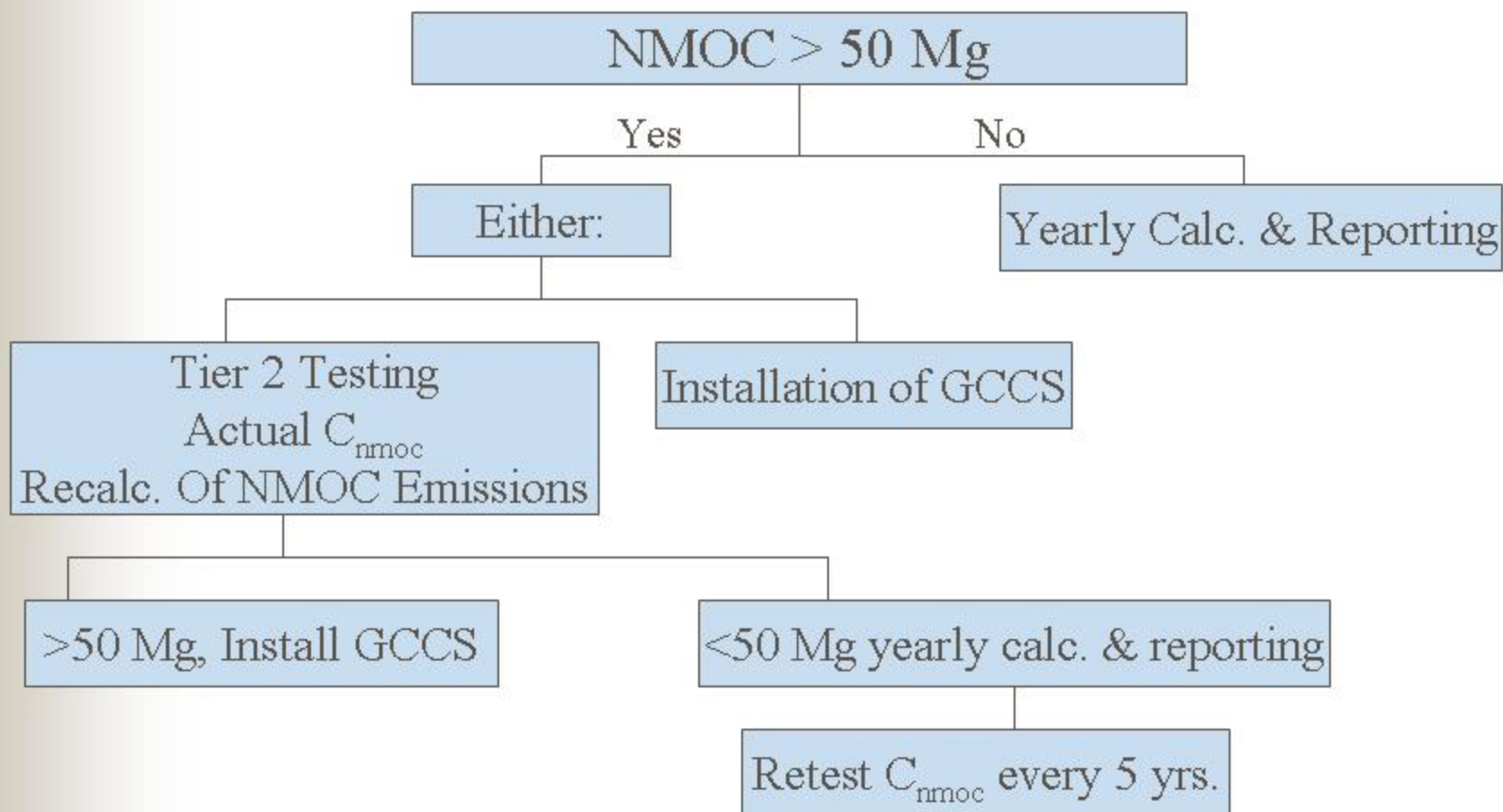
- Submit Initial Design Capacity Report (DCR)
  - If landfill  $> 2.5$  million  $m^3$  or 2.5 million Mg, subject to yearly calculation of NMOC
  - If landfill  $< 2.5$  million  $m^3$  or 2.5 million Mg
    - Submit amended DCR if landfill is expanded
    - Subject to regulation if expanded to greater than 2.5 million  $m^3$



# NSPS Subpart WWW

- Submit Initial DCR
  - $>2.5$  million  $m^3$ , subject to WWW
  - $<2.5$  million  $m^3$ , same as Cc
- Yearly calculations of the NMOC
  - EPA LandGEM
    - Based on yearly waste acceptance rates
    - Uses very conservative values; overestimation
  - If  $> 50$  Mg...

# Decision Tree for WWWW





# Landfill Gas Collection and Control System

- Installation to collect all the landfill gas and prevent it from reaching the atmosphere before it is controlled
- In Colorado, simplest control technology is a flare
- Monitoring of the system
  - Wells
  - Flare



# MACT Subpart AAAAA

- Landfill is subject if required to have a LGCCS
- Increased NSPS WWW reporting frequency
- SSM Reporting
  - Jury still out...

ANY SPECIFIC QUESTIONS  
ABOUT THE REGULATIONS?





# Colorado Air Permitting Process

- Prior to construction, submit an Air Pollution Emission Notice (APEN) to the Division
  - Tells us:
    - What the process is
    - How much pollution it will produce
    - What kind of permit it needs
  - APEN's need to be renewed if there is a process change (i.e. expansion of landfill) or every 5 years



# Permitting

- Permitting levels
  - 5-100 tons per year = construction permit (minor source)
  - >100 tons per year = Title V permit (major source)
  - Landfills subject to Cc or WWW (>2.5 million m<sup>3</sup>) are automatically Title V due to the NSPS regulation.



# Construction Permits and Title V Permits

- WWWW requires a Title V permit
- State policy requires a Construction Permit prior to a Title V Permit
  - For the meantime until the Title V permit is written.
  - Similar requirements to what you will find in a Title V permit.



# Common items you may find in your permit

- Waste acceptance limitation
  - Conservative estimate
  - Usually tons per year
- Fugitive dust control plan
  - Vehicle speed limits
  - Control of dust on unpaved roadways
  - Closure of the landfill at high wind speeds
  - Revegetation of stockpiles when not in use

## Vehicle Speed Limits on Roadways



## Control of Dust on Unpaved Roadways



Revegetation of stockpiles



ANY SPECIFIC QUESTIONS  
ABOUT PERMITTING?





# Inspection Process

- Unannounced vs. Announced
  - Advantages to each method
  - Depends on the inspector
- What to expect
  - Records review
  - Site tour



# Inspection Process

- Records Review

- 12 month rolling totals, SSM plans, reports

- Pointers

- Review permit
- Keep records up-to-date
- Be flexible



# Any Questions?

- Thanks to SWANA for inviting me to speak.