

**STATEMENT OF BASIS FOR CITY OF SPOKANE NORTHSIDE LANDFILL
CHAPTER 401 AIR OPERATING PERMIT
AOP-16 RENEWAL #2**

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Date: March 23, 2017

Updated: 5/11/17 (revised LFG collection system description)

LIST OF ABBREVIATIONS

BACT	Best available control technology
CAM	Compliance Assurance Monitoring
CEM	Continuous emission monitor
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
COMS	Continuous opacity monitoring system
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
IEU	Insignificant Emission Units
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O ₂	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PM-2.5	Particulate matter, 2.5 microns or less in size
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emissions Unit
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority (on June 3, 2007, SCAPCA was renamed to SRCAA)
SRCAA	Spokane Regional Clean Air Agency (prior to June 3, 2007, agency was named SCAPCA)
scf	Standard cubic foot
SO ₂	Sulfur dioxide
SO _x	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

DEFINITIONS OF WORDS AND PHRASES

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(13), 8/10/11]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 8/10/11]
Emission Limitation	A requirement established under the FCAA or Chapter 70.94 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70.94 RCW [WAC 173-400-030(27), 11/28/12]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70.94 RCW, or 70.98 RCW [WAC 173-400-030(29), 11/28/12]
Federal Clean Air Act	Federal Clean Air Act. also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(14), 8/10/11]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(58), 11/28/12]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

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BACKGROUND

The City of Spokane operates a municipal solid waste (MSW) landfill, the Northside Landfill, at 7202 Nine Mile Road in Spokane, WA. The majority of the landfill is closed, however a small portion of landfill is still open and actively accepting waste in a Municipal Solid Waste Cell and Demolition Cell (collectively referred to as the MSW cell). The facility is subject to the requirements of 40 CFR 60, Subpart Cc, which are incorporated into WAC 173-400-070(8). According to WAC 173-400-070(8)(i), a MSW landfill that has a design capacity equal to or greater than 2.5 million megagrams or 2.5 million cubic meters on January 7, 2000 and is still accepting waste, is subject to Chapter 173-401 WAC beginning on 9/15/01 (original effective date of WAC 173-400-070(8)). The landfill has a design capacity of 3.62 million megagrams (3.01 million megagrams from the closed portion of the landfill and 0.61 million megagrams from the MSW cell). Since the MSW cell is still open and the landfill has a design capacity of over 2.5 million megagrams, the City of Spokane was required to apply for an operating permit under SRCAA's Title V air operating permit program as established in Chapter 173-401 WAC.

According to WAC 173-400-070(8)(i), when a landfill is closed, the owner or operator is no longer subject to the requirement to maintain an operating permit for the landfill if the landfill is not subject to Chapter 173-401 WAC for some other reason and either: i) the landfill was never subject to the requirements for a control system under 40 CFR 62.14353 or ii) the landfill meets the conditions for control system removal specified in 40 CFR 60.752(b)(2)(v).

WAC 173-401-700(8) requires that at the time a draft permit is issued under the Title V program, a statement be provided setting forth the legal and factual basis for permit conditions including reference to the applicable statutory or regulatory provisions for the conditions. This document provides the basis for the draft permit renewal for the Northside Landfill.

The permit is organized into sections. The first section contains standard terms and conditions. This section is the generally the same for all permits issued by SRCAA. The second section contains applicable requirements that apply to the facility, along with monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with each applicable requirement. This section is divided into subsections to address different emission units or classes of emission units. The third and final section addresses requirements that have been deemed inapplicable to the source or to emission units located at the source, i.e., the permit shield per WAC 173-401-640(2).

This Statement of Basis is comprised of the following sections:

FACILITY SUMMARY;
PERMITTING HISTORY;
NEW REQUIREMENTS SINCE LAST PERMIT RENEWAL;

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REVIEW OF CAM APPLICABILITY;
COMPLIANCE HISTORY;
EMISSION UNITS; and
PERMIT TERMS, CONDITIONS, EMISSION LIMITS, MRRR, & PERMIT SHIELD

The format of the PERMIT TERMS, CONDITIONS, EMISSION LIMITS, MRRR, & PERMIT SHIELD follows that of the permit with the standard terms and conditions discussed first, followed by the applicable requirements, and lastly the permit shield.

FACILITY SUMMARY

The Northside Landfill was the primary municipal solid waste disposal facility for Spokane County from the 1930s until 1991. The landfill accepted materials ranging from municipal solid waste to ash from an incinerator operated during the 1940s–1950s. In the early 1980s, trace levels of volatile organic compounds (VOCs) from the landfill were detected in the Spokane Aquifer and nearby wells. Because of the nature and levels of contaminants, EPA placed the Northside Landfill on the National Priorities List under the Superfund Law. Remedial activities included extraction and treatment of groundwater and closing and capping the landfill. Also included in the remedial actions was the installation of an active gas collection and control system, which included three enclosed landfill flares.

Actual closure of the landfill occurred in 1991, except for the MSW Cell, which continues to accept nonprocessables, bypass waste from the regional Waste to Energy Plant, and inert debris.

Three enclosed landfill flares have been installed at the Northside Landfill. The flares are used to burn landfill gases collected from the closed portion of the landfill (primarily methane with some VOC and toxic components). The gas collection system at the landfill consists of gas internal and trench wells and manifold piping. Gas is pulled from the ground surrounding the wells by a vacuum exhaustor. The collected gases are pumped to the flare station for control. The original perimeter wells are now used for monitoring purposes only, along with the gas probes, to verify that landfill gas is not migrating beyond the property.

The gas flare station consists of three flares, flame arresters, fans, filters, one propane system, and flare instrumentation. The refractory-lined flares provide residence time for combustion of the organic components of the landfill gas. The gas enters the base of the flare and is distributed through a burner plenum into a group of radial burner arms. These burner arms provide turbulent mixing in the ignition zone of the flare. The combustion is controlled through the landfill gas flow rate and the combustion air supply rate. Each of the three flares has rated capacity of 1,267 scfm of landfill gas. The flares are designed to operate with landfill gas methane concentrations ranging from 20-60%. The flares are started with a pilot burner, fueled by propane. The pilot burner is operational only for the startup sequence of a flare and stays on only until the main flame has been established. The flare startup sequence will not proceed unless the pilot flame is confirmed, as a safety precaution to prevent the uncontrolled release of landfill gas.

Emissions from the facility include combustion emissions (primarily NO_x, CO, and trace amounts of SO₂) from the flares and VOC and toxic air pollutants, collected from the landfill, that are not controlled by the flares.

Annual criteria pollutant and HAP emissions from the facility for the last completed operating year (2015) are listed in Table 1 below.

Table 1 – 2015 Criteria Pollutant and HAP emissions

Pollutant	Emissions (tons/yr)
PM	0.59
PM10 (as PM)	0.59
SO ₂	0.06
NO _x	0.45
CO	0.93
VOC	0.09
HCl	0.59

PERMITTING HISTORY

SRCAA has issued the following Notice of Construction (NOC) approval orders and regulatory orders to the Northside Landfill:

- NOC #378 was approved 3/19/92 for construction of an active landfill collection system and three flares at the site.
- NOC #378 was revised 5/31/01 to i) change the frequency of landfill gas BTU content measurements from daily to weekly, and ii) remove the registration requirement.
- NOC #378 was revised 8/30/02 to change the flare source testing requirements to be consistent with the applicable NSPS (40 CFR 60 Subpart Cc).
- NOC #378 was revised 9/2/16 for administrative revisions and changes in monitoring requirements.

SRCAA has issued the following Air Operating Permits (AOP) to the Northside Landfill:

- AOP-16 was issued to the City of Spokane Northside Landfill on 1/2/03
- AOP-16, Renewal #1 was issued on 6/10/10.

NEW REQUIREMENTS SINCE LAST PERMIT RENEWAL

GREENHOUSE GAS REQUIREMENTS

Chapter 173-441 WAC – State GHG reporting requirements

On December 1, 2010, Ecology promulgated a regulation, Chapter 173-441 WAC, for state reporting of greenhouse gas (GHG) emissions. Chapter 173-441 WAC establishes GHG reporting requirements that apply to owners and operators of certain facilities that directly emit GHG in Washington. The rule applies to any facility that emits 10,000 metric tons carbon dioxide equivalent (CO₂e) or more per calendar year in total GHG emissions. In 2015, Ecology amended chapter 173-441 WAC, in order to maintain consistency with EPA's greenhouse gas reporting program. The amendments included revising the global warming potentials in WAC 173-441-040, updating calculation and monitoring methods, and minor streamlining revisions to reporting requirements. In 2016, Ecology further amended Chapter 173-441 WAC, in order to have terminology consistent with Chapter 173-442 WAC – Clean Air Rule [see Clean Air Rule discussion below]

For an existing facility that began operation before January 1, 2012, GHG emissions must be reported to Ecology for calendar year 2012 and each subsequent calendar year. The report is due by March 31st of each calendar year for GHG emissions in the previous calendar year if a person is also required to report GHG emission to EPA under 40 CFR Part 98. The report is due by October 31st of each calendar year for GHG emissions in the previous calendar year if a person is not required to report GHG emissions to EPA under 40 CFR Part 98.

As part of the AOP-16, renewal application, the Northside Landfill submitted information on their maximum GHG PTE from the facility. Based on the amount of landfill gas generated at the landfill, the estimated maximum GHG PTE from the facility is ~22,178 metric tons of CO₂e. However, per Neil Caudill of Ecology's GHG program, reporting thresholds for landfills are based on methane emissions and combustion emissions, but only if combustion is in a unit other than a flare. CO₂ emissions from the landfill and the flare are not included in the GHG reporting. Facility emissions based on reporting protocols are about 7300 metric tons annually. The annual GHG emission reporting requirements of Chapter 173-441 WAC are included in the permit in case, at a later date, emissions are above the reporting threshold. The reporting requirement was added to the air operating permit renewal as Condition I.D.9, in the "General Monitoring, Recordkeeping, & Reporting" section of the permit.

40 CFR Part 98 - Federal GHG reporting requirements

On October 30, 2009, and as amended on July 12, 2010, September 22, 2010, November 30, 2010, December 1, 2010, December 17, 2010, December 27, 2010, and March 18, 2011, EPA promulgated regulations for mandatory federal GHG reporting in 40 CFR Part 98. In general, the regulations require that facilities that emit 25,000 metric tons of CO₂e must report their GHG emissions to EPA.

The federal GHG reporting requirements given in 40 CFR Part 98 are not considered "applicable requirements," as defined in 40 CFR 70.2, under the title V operating permit

program. Therefore, inclusion of the federal GHG reporting requirements in 40 CFR Part 98 is not required for the Title V permit.

40 CFR Parts 51, 52, 70, and 71 - "Tailoring Rule"

On May 13, 2010, EPA issued a final rule that "tailors" the applicability criteria given in 40 CFR Parts 51, 52, 70, and 71 that determine which stationary sources and modification projects become subject to permitting requirements for GHG emissions under the PSD and Title V programs of the Clean Air Act. Per the 2010 version of the tailoring rule, on and after July 1, 2011, any existing or new source with the potential to emit more than 100,000 tpy CO₂e needed a Title V permit. Additionally, for PSD, permitting requirements were triggered if the project was expected to increase GHG emissions by more than 75,000 tpy CO₂e.

On June 23, 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA*, 134 S. Ct. 2427 (2014) ("UARG"). The Court held that EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology (BACT).

On April 10, 2015, in accordance with the Supreme Court decision, the D.C. Circuit issued an amended judgment in *Coalition for Responsible Regulation, Inc. v. EPA*, Nos. 09-1322, 10-073, 10-1092 and 10-1167 (D.C. Cir. April 10, 2015), which, among other things, vacated the PSD and title V regulations under review in that case to the extent that they require a stationary source to obtain a PSD or title V permit solely because the source emits or has the potential to emit GHGs above the applicable major source thresholds. The D.C. Circuit also directed EPA to consider whether any further revisions to its regulations are appropriate in light of UARG, and if so, to undertake to make such revisions.

On April 30, 2015, in response to the court decision, EPA issued a direct final rule to narrowly amend the permit rescission provisions in the PSD regulations. This action allows the rescission of Clean Air Act PSD permits that issued by the EPA or delegated state and local permitting authorities on the sole basis of a source's GHG emissions.

On August 26, 2016, the EPA proposed a set of common sense changes needed to bring EPA's air permitting regulations in line with Supreme Court and D.C. Circuit decisions on greenhouse gas permitting. This rulemaking proposes revisions to existing PSD and title V regulations to ensure that neither the PSD nor title V rules require a source to obtain a permit solely because the source emits or has the potential to emit GHGs above the applicable thresholds.

Based on PTE emission estimates given above, the Northside Landfill is not considered major for GHG under the tailoring rule. The permit incorporates the most recent version of Chapter 173-400 WAC, which adopts by reference the subparts of 40 CFR 52.21, in effect on January 1, 2016, into WAC 173-400-720, "Prevention of significant deterioration (PSD),"; these subparts include the tailoring rule new source review thresholds. The permit requires that the Northside Landfill meet the requirements given in the current version of Chapter 173-400 WAC for any

new source review project that might occur (Condition I.G.1). This condition will ensure that the Northside Landfill meets all applicable requirements pertaining to projects that cause an increase of GHG emissions.

CLEAN AIR RULE

On September 15, 2016, Ecology promulgated a regulation, Chapter 173-442 WAC, which establishes GHG emissions standards starting in 2017 for petroleum product producers and importers, natural gas distributors, and other “covered” stationary sources. The rule defines "Covered stationary source GHG emissions" as GHG emissions from source categories listed in WAC 173-441-120.

The rule triggers GHG emission reduction requirements for a covered source when their three calendar year rolling average of GHG emission, beginning with calendar year 2012, are greater than or equal to the specified compliance threshold in the corresponding compliance period, as given in the table below:

WAC 173-442-030 - Table 1

Compliance Threshold (MT CO2e/Year)	First Compliance Period (Calendar Year)
100,000	2017-19*
95,000	2020-22
90,000	2023-25
85,000	2026-28
80,000	2029-31
75,000	2032-34
70,000	2035 and beyond

*The 100,000 MT CO2e/year threshold is used for the three calendar year rolling average applicability determination beginning in 2012.

Based on the estimated GHG emissions for the Northside Landfill, Chapter 173-442 WAC does not apply to the Northside Landfill and it is unlikely that the requirements of Chapter 173-442 WAC will ever be triggered for this source. Therefore inclusion of the Chapter 173-442 WAC requirements in the air operating permit renewal is not necessary.

EMERGENCY PROVISIONS

On 5/22/15, Ecology had received a SIP call from EPA regarding the Excess Emissions provisions given in WAC 173-400-107, specifically the treatment of excess emissions during periods of startup, shutdown, and malfunction (SSM). Per the SIP call, Ecology has 18 months, until November 22, 2016, to submit SIP revisions correcting the SSM provisions found to be inadequate. Per EPA’s 5/22/15 Final Action Notice, existing sources will not be required to comply with the revised SIP emission limitations until the SIPs are updated, and if they are subject to permit requirements the sources may continue to operate consistent with those permits until the operating permits are revised to reflect the revised SIP requirements. Ecology

will not meet the November 22, 2016 deadline. Ecology anticipates completing rulemaking and submitting a revised SIP to EPA during the summer 2017. Concurrent with this rule making action, Ecology also has proposed revision to the emergency provision given in WAC 173-401-645. The proposed revision would make the emergency provision ineffective as of January 1, 2018, and provide for the permitting authority to remove provision from an individual operating permit during the first possible periodic permit renewal, permit modification, or permit reopening after this date.

Since the AOP-16 Renewal #2 is expected to be finalized prior to completion of Ecology's rule making, the new requirements will be incorporated into the AOP-16 the next time the AOP is reopened.

40 CFR 60 SUBPART Cf— EMISSION GUIDELINES AND COMPLIANCE TIMES FOR MUNICIPAL SOLID WASTE LANDFILLS

In August 2016, EPA published in the Federal Register final revisions to the Emission Guidelines for existing MSW landfills (40 CFR Part 60, Subpart Cf). The final rule became effective on October 28, 2016. The updated Emission Guidelines apply, through EPA-approved state plans or a federal plan, to landfills constructed, modified, or reconstructed on or before July 17, 2014 and accepted waste after November 8, 1987. These landfills are subject to the guidelines if they have a design capacity of 2.5 million metric tons are subject to the guidelines if they have a design capacity of 2.5 million metric tons and 2.5 million cubic meters of waste or more. These capacity thresholds are the same as in previous requirements. However, the emissions threshold for triggering landfill gas collection and control system requirements at active landfills was lowered from 50 metric tons (50 mega grams) of NMOC to 34 metric tons (34 mega grams); closed landfills would remain subject to the 50-metric ton threshold. Per review of the most recently submitted annual NMOC emission calculations for the Northside Landfill, NMOC emissions are 22.3 metric tons per year, which is below the 34 metric ton threshold for triggering installation of landfill gas collection and control systems.

To date, EPA has not proposed a federal plan for implementation of the Subpart Cf emissions guidelines, and Ecology has not incorporated the Subpart Cf emissions guidelines into Chapter 173-400 WAC. Per Elena Guifoil, Ecology, the state will not be incorporating the new guidelines into WAC 173-400 until EPA promulgates a federal plan; upon promulgation of a federal plan, Ecology will adopt the plan by reference and incorporate Subpart Cf requirements in WAC 173-400. Until such time that state or federal plans are approved by EPA, the emission guidelines in 40 CFR 60 Subpart Cc, which are incorporated into WAC 173-400-070(8), are still applicable to Northside Landfill.

According to WAC 173-401-730, when additional requirements become applicable to a source with a remaining permit term of three or more years, the permit must be reopened and revised to include the additional requirements. The finalized AOP-16 Renewal #2 is not expected to expire until 2022 (which is expected to be more than three years after 40 CFR 60 Subpart Cf is incorporated into WAC 173-400). Therefore reopening of the AOP is not expected to be required.

REVIEW OF COMPLIANCE ASSURANCE MONITORING (CAM) APPLICABILITY

40 CFR Part 64 requires monitoring sufficient to provide a reasonable assurance of compliance with the applicable requirements (e.g., emissions limits) and to ensure operators pay the same level of attention to pollution control measures as to production activities. The rule applies to each pollutant-specific emissions unit (PSEU) at a facility that meets the following criteria:

- i. Is located at major source subject to Title V operational permits program, and
- ii. Is subject to an emission limitation and has a control device to meet that limit (e.g., electrostatic precipitators, scrubbers, fabric filters), and
- iii. Has precontrolled emissions > major source size threshold (e.g., >100 tons/year uncontrolled emissions).

The Northside Landfill is not a major source, so 40 CFR Part 64 does not apply.

COMPLIANCE HISTORY

SRCAA has performed compliance inspections at the Northside Landfill periodically since 1992. The most recent inspections were performed on 5/5/16 and 5/17/16. During the past ten years, SRCAA has issued the following Notices of Violation to the Northside Landfill:

- NOV #7479, issued 10/06/06, for failure to submit the annual NMOC emission rate by the required date.
- NOV #7701, issued 10/21/08, for failure to submit their annual NMOC emission rate by the required date.
- NOV #7830, issued 5/6/10, for failure to submit their 2009 Emission Inventory by the required date.

In addition to the three NOVs, on 2/28/00, a corrective action letter was sent to the Northside Landfill regarding implementing procedures and modifications to ensure proper location, operation, and maintenance of the flare temperature monitoring equipment. This letter was in response to a 1/18/00 letter from the Northside Landfill which proposed procedures and modifications to ensure the flare temperatures are properly maintained and monitored.

EMISSION UNITS

Emission units at the Northside Landfill can be broken into four categories: the Municipal Solid Waste (MSW) landfill, the active landfill gas collection and control system for the closed portion of the landfill, Miscellaneous Emission Units, and Insignificant Emission Units.

A subsection on each of these categories follows.

Municipal Solid Waste (MSW) Landfill

This section of the permit covers the municipal solid waste (MSW) landfill to which the requirements of 40 CFR 60, Subpart Cc apply, as implemented through WAC 173-400-070(8).

Per EPA, the definition of MSW Landfill includes only the actual landfill cells and does not include other emission units at a landfill facility (e.g., haul roads, flares, etc). Therefore, this section includes only the landfill cells. Significant MSW landfill emission units are listed in Table 2 below.

According to the requirements of WAC 173-400-070(8), a landfill is required to collect and control emissions if the uncontrolled NMOC emissions from the landfill exceed 50 megagrams per year. Based on the 2015 NMOC emissions rate report required under WAC 173-400-070(8), the uncontrolled NMOC emissions from the Northside Landfill (both closed portion and MSW cell) are 22.3 metric tons per year. Therefore, it should be noted that although landfill gas from the closed portion of the landfill is equipped with an active collection system and controlled with flares, a collection and control system is not required under WAC 173-400-070(8) because the uncontrolled landfill emissions are below the current 50 megagrams per year. If at some future point the uncontrolled emissions from the landfill exceed the currently applicable threshold of 50 megagrams per year, or any revised applicable NMOC emission threshold, a collection and control system will be required under WAC 173-400-070(8).

Table 2 – Municipal Solid Waste (MSW) Landfill Significant Emission Units

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Municipal Solid Waste (MSW) Landfill	1-1	N/A	None required at the time of permit issuance under WAC 173-400-070(8)

Active Landfill Gas Collection and Control System

Significant active landfill gas collection and control system emission units are listed in Table 3 below. The flare system was approved under NOC #378.

Table 3 – Active Landfill Gas Collection and Control System Significant Emission Units

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Active Landfill Gas Collection System and Landfill Gas Flares – one operating flare, two back-up flares (NOC #378)	4-1, 4-2, 4-3	Landfill Gas and Propane (to start flares)	Landfill Gas Flares (1,267 scfm design capacity per flare)

Miscellaneous Emission Units

Miscellaneous Emission Units are sources that are considered “significant” emission units, but do not have additional unit-specific requirements (i.e., Notice of Construction approval conditions, NSPS standards, etc.) that apply. These sources are subject only to the facility-wide emission limitations. Table 4 lists miscellaneous emission units that are considered significant

emission units. The condensate sumps and sewer discharge were not reviewed as part of the Notice of Construction for the landfill gas collection and control system.

Table 4 – Significant Emission Units Subject Only to Facility-wide Emission Limitations

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Condensate Sumps (5)	4-5, 4-6, 4-7, 4-8, & 4-9	N/A	None
Sewer Discharge	5-2	N/A	None

Insignificant Emission Units

Insignificant emission units (IEUs) include any activity or emission unit located at a major source which qualifies as insignificant under the criteria listed in WAC 173-401-530. A list of the IEUs, identified in the permit application, is presented below in Table 5. In order to remain an IEU, emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels.

IEUs are subject to the generally applicable requirements (i.e., facility-wide emission limitations). According to WAC 173-401-530, testing, monitoring, recordkeeping, and reporting are not required for IEUs unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the state implementation plan. SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the IEUs presented in Table 5 to assure compliance with the generally applicable requirements. SRCAA’s determination was based on the following:

- SRCAA has not documented a violation of any of the generally applicable requirements in the past from the list of IEUs in Table 5 (i.e., the IEUs have had a consistent compliance history); and
- The IEUs emit very small quantities of pollutants and do not operate continuously.

Table 5 – Insignificant Emission Units

Emission Unit Description	Basis / Justification for IEU Designation
Fuel Storage Tank (split-compartment above ground storage tank: 500 gallon gasoline storage compartment, 1500 gallon diesel storage compartment)	WAC 173-401-533(2)(c)
Portable Space Heater, rated at 70,000 BTU/hr (kerosene fueled)	WAC 173-401-533(2)(r)
Roadways at the site	WAC 173-401-530(1)(d)

PERMIT TERMS, CONDITIONS, EMISSION LIMITS, MRRR, & PERMIT SHIELD

I. STANDARD TERMS AND CONDITIONS

This section of the Northside Landfill permit contains standard terms and conditions that apply to all sources in SRCAA's Title V program. These conditions have been reviewed by EPA and include all terms required in Chapter 173-401 WAC as well as requirements from other air quality laws and regulations. The standard terms and conditions have been organized in seven subsections including:

PERMIT ADMINISTRATION (Section I.A);
INSPECTION & ENTRY (Section I.B);
EMERGENCY PROVISIONS (Section I.C);
GENERAL MONITORING, RECORDKEEPING, & REPORTING (Section I.D);
COMPLIANCE CERTIFICATION (Section I.E);
TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS AND TREATMENT
OF DOCUMENTS (Section I.F); and
APPLICABLE WHEN TRIGGERED REQUIREMENTS (Section I.G).

A discussion of each subsection follows. The requirements in each section are briefly discussed, along with the citations for each requirement. Using the same methodology as the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation. Although, in and of itself, Chapter 173-401 WAC is not federally enforceable, the requirements of this regulation are based on federal requirements for the operating permit program. Upon issuance of the original permit for the Northside Landfill, the terms based on Chapter 173-401 WAC became federally enforceable for the source. These terms will be replaced with the updated terms given in this renewal permit, upon issuance.

Requirements for which SRCAA doesn't have a current delegation from EPA or have adopted the EPA requirements by reference are indicated by the phrase "EPA only".

NOTE: The adoption date for each requirement is also given. The adoption date may be important if an earlier version of the requirement is in the State Implementation Plan (SIP). In many instances, a revision may have occurred within a section that does not affect the requirement being cited. If this is the case, the most recent adoption date is given, along with the SIP version date in parentheses, and the requirement is federally enforceable. If a change was made in the requirement, both the earlier, SIP approved, requirement and the most recent requirement would go in the permit. The version in the SIP would be federally enforceable, and the more recent version would be enforceable at the state or local level.

If a new rule or a newer version of a rule has been submitted to EPA for inclusion in the SIP and EPA has proposed, but not issued, approval, the permit will be drafted so that when EPA approval does occur, the requirement will become federally enforceable.

I.A. Permit Administration

Below are standard terms included in the Permit Administration subsection. Generally the

language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirement.

I.A.1. Federal Enforceability. All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. [WAC 173-401-625, 10/4/93]

I.A.2. Duty to Comply. The permittee must comply with the terms and conditions of the permit. [WAC 173-401-620(2)(a), 10/4/93]

I.A.3. Schedule of Compliance. The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis. [WAC 173-401-630(3), 2/3/16]

I.A.4. Need to Halt or Reduce Activity Not a Defense. The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action. [WAC 173-401-620(2)(b), 10/4/93]

I.A.5. Permit Actions. This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance. [WAC 173-401-620(2)(c), 10/4/93]

I.A.6. Reopening for Cause. This term lists instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements. [WAC 173-401-730, 10/4/93]

I.A.7. Emissions Trading. No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [WAC 173-401-620(2)(g), 10/4/93]

I.A.8. Property Rights. The permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]

I.A.9. Duty to Provide Information. The permittee must furnish, within a reasonable time to SRCAA, any information, including records required in the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. [WAC 173-401-620(2)(e), 10/4/93]

I.A.10. Duty to Supplement or Correct Application. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit

application, must promptly submit such supplementary facts or corrected information. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit. [WAC 173-401-500(6), 9/16/02]

I.A.11. Permit Fees. The permittee must pay fees as a condition of this permit in accordance with SRCAA's fee schedule. [WAC 173-401-620(2)(f), 10/4/93]

I.A.12. Severability. If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable. [WAC 173-401-620(2)(h), 10/4/93]

I.A.13. Permit Appeals. The permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on SRCAA within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA, including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i)] [WAC 173-401-735(1), 4/2/97]

I.A.14. Permit Renewal and Expiration. The permit is in effect for five years. The permittee's right to operate this source terminates with the expiration of the permit unless a timely and complete application for renewal is submitted. Chapter 173-401-710(1) allows SRCAA to set, in the permit, the due date for the renewal as long as it is no more than 18 months and no less than six months prior to expiration of the permit. SRCAA specifies in the permit that the renewal must be submitted no more than 18 months and less than 12 months prior to the permit expiration. The facility may continue to operate subject to final action by SRCAA on the application, as long as a timely and complete application has been filed and all requested additional information necessary to process the permit is submitted by the deadline specified in writing by SRCAA. [WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1) & (3), 9/16/02]

I.A.15. Permit Continuation. The permit will not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]

I.A.16. Permit Shield. Compliance with a permit condition is deemed compliance with the applicable requirements identified in the permit upon which that condition is based, as of the date of permit issuance except that this shield will not affect the following:

- a. The provisions of Section 303 of the FCAA (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 ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;
- d. The ability of SRCAA to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(1) & (4), 10/4/93]

I.B. Inspection and Entry

Below are standard terms included in the Inspection & Entry subsection. This subsection contains requirements for allowing authorized access to a facility for purposes of assuring/determining compliance with air quality requirements. Generally the language tracks the rule language closely with only minor changes for clarity and conciseness. There is no intent to alter the effect of the requirements.

I.B.1. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the permittee must allow SRCAA, or an authorized representative, to enter a Chapter 401 facility or location where records are kept, to have access to and copy, at reasonable times records, to inspect, at reasonable times, any facility or equipment or operations regulated by the permit, and/or to perform sampling or monitoring, at reasonable times, for the purpose of assuring compliance. [WAC 173-401-630(2), 2/3/16] [SRCAA Regulation I, Article II, Section 2.02.E & F, 3/4/04 – STATE/LOCAL ONLY] [NOC #378, Condition 10, 3/19/92 as revised on 5/31/01, 8/30/02 & 9/2/16]

Nothing in this condition limits the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

I.B.2. Obstruction of Access. No person may obstruct, hamper, or interfere with any authorized representative of SRCAA who requests entry for the purpose of inspection, and who presents appropriate credentials; nor may any person obstruct, hamper or interfere with any such inspection. [RCW 70.94.200, 1998 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article II, Section 2.02.E & F, 3/4/04 – STATE/LOCAL ONLY] [NOC #378, Condition 10, 3/19/92 as revised on 5/31/01, 8/30/02 & 9/2/16]

I.C. Emergency Provisions

Below are standard terms that are included in the Emergency Provisions subsection. This subsection of the permit contains provisions, governing the treatment of periods of emissions in excess of applicable standards, when such emissions stem from unforeseeable events or arise from start-up, shutdown or maintenance, where design or operational practices could not preclude such emissions. Generally, the language closely tracks the rule language, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

I.C.1. Emergencies. This term incorporates the emergency provisions established in Chapter 173-401 WAC which allow for a positive defense to noncompliance with technology-based emission limitations if certain conditions are met. The time limits for reporting such emission events are included to assure that the permittee is aware of the timeframes. The time limits come from WAC 173-401-645 and WAC 173-401-615(3)(b). [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

I.C.2. Excess Emissions. This term incorporates the excess emissions provisions of Chapter 173-400 WAC. If excess emissions due to startup or shutdown conditions, scheduled maintenance, or upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-107 (until the effective date of EPA's incorporation of WAC 173-400-108 and 173-400-109 into the Washington state implementation plan) or WAC 173-400-108 and WAC 173-400-109 (on and after the effective date of EPA's incorporation of WAC 173-400-108 and 173-400-109 into the Washington state implementation plan), such emissions are violations of the applicable statute, regulation, permit, or regulatory order but are not subject to penalty. The permittee shall submit a notification of the excess emissions in accordance with Condition I.D.7-Prompt Reporting of Deviations below, and upon request by SRCAA, submit a report in accordance with Condition C.4-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports below. [WAC 173-400-107, 108, 109, 3/1/11] [WAC 173-401-615(3)(b), 9/16/02]

I.C.3. Report of Breakdown. This term establishes the conditions under which violations of SRCAA Regulation I may be excused. If pollutants are emitted in excess of the limits established by SRCAA Regulation I as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, SRCAA may excuse the permittee from penalties if the permittee submits a notification of the breakdown is reported in accordance with Condition I.D.7-Prompt Reporting of Deviations below and upon request by SRCAA's control officer, submits a report in accordance with Condition I.C.4-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports.

The control officer, upon receipt of a report from the permittee describing a breakdown, may:

- a. Allow operation exempt from penalties, but only for a limited time period, after which the permittee will be required to comply with SRCAA Regulation I or be subject to the penalties in SRCAA Regulation I, Section 2.11. Such an exemption may be withdrawn if the exempt operation becomes a cause of complaints; or
- b. Require that the permittee curtail or cease operations until repairs are completed if the quantity of pollutants or the nature of the pollutants could cause damage.

Note: This provision does not provide relief against federally enforceable applicable

requirements. [SRCAA Regulation I, Section 6.08, 3/4/04- STATE/LOCAL ONLY]

I.C.4. Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports. This term incorporates the reporting requirements of WAC 400-107, -108, and -109. In the event of emergencies, excess emissions, upset conditions, and/or breakdowns (see Conditions I.C.1, I.C.2, & I.C.3 above), if requested by SRCAA, or if required under an applicable requirement, the permittee shall submit a full written report including:

- a. Date, time, and duration of the event,
- b. Known causes of the event;
- c. Records documenting the permittee's actions in response to the excess emissions event;
- d. Steps taken to repair the breakdown, if applicable, including a schedule to complete the repairs;
- e. Corrective actions taken, including preventative measures to be taken to minimize or eliminate the chance of recurrence;
- f. Information on whether emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage; and
- g. All additional information required under WAC 173-400-107 (until the effective date of EPA's incorporation of WAC 173-400-108 and 173-400-109 into the Washington state implementation plan) or WAC 173-400-109 (on and after the effective date of EPA's incorporation of WAC 173-400-108 and 173-400-109 into the Washington state implementation plan) supporting the claim that the excess emissions were unavoidable.

[WAC 173-401-615(3)(b), 9/16/02] [WAC 173-400-107, 108, 109, 3/1/11] [SRCAA Regulation I, Section 6.08, 3/4/04 – STATE/LOCAL ONLY] [

I.D. General Monitoring, Recordkeeping, & Reporting

Below are standard terms included in the General Monitoring, Recordkeeping, & Reporting subsection. This subsection contains general monitoring, recordkeeping, and reporting (MRRR) requirements. MRRR requirements that apply to specific emission standards or specific emission activities are located in Section II of the permit. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the Monitoring Reports terms, attempts have been made to clarify SRCAA's expectation of how the requirements will be met. The discussions below provide more detail on these efforts and the regulatory authority relied upon to establish the terms.

I.D.1 Records of Required Monitoring Information. This term details what records must be kept relating to monitoring. [WAC 173-401-615(2)(a), 9/16/02]

I.D.2. Permanent Shutdown of an Emission Unit. If an emission unit is permanently shut down, rendering existing permit terms and conditions irrelevant, the permittee will not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emission unit, once any residual requirements, such as the semi-annual report and annual compliance certification covering the last period during which the unit last operated, have been met. All records, relating to the shutdown emission unit, generated while the emission unit was in operation, must be kept in accordance with Conditions I.D.1- Records of Required Monitoring Information and I.D.5 – Retention of Records.

Contemporaneous with the shutdown of the emission unit, the permittee must record the date that operation of the emission unit ceased using a log or file on site. The shutdown date must be reported to SRCAA on the monitoring report, required under Condition I.D.6 - Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

I.D.3. Operational Flexibility. In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

I.D.4. Records of Changes. The permittee must keep records of changes made at the source that result in emissions of a regulated air pollutant, subject to an applicable requirement, but not otherwise regulated under the permit, and the nature and quantity of emissions resulting from such a change. [WAC 173-401-615(2)(b), 9/16/02]

I.D.5. Retention of Records. The permittee must keep monitoring data and support information for a period of five years. [WAC 173-401-615(2)(c), 9/16/02]

I.D.6. Monitoring Reports. Unless a shorter time period is specified in the permit, the permittee must submit monitoring reports to SRCAA as follows:

- Monitoring report covering the period from January 1 – June 30 each year shall be submitted to SRCAA and postmarked no later than July 30 of the same calendar year; and
- Monitoring report covering the period from July 1 – December 31 each year shall be submitted to SRCAA and postmarked no later than April 15 of the following calendar year.

All instances of permit deviations must be identified in the monitoring reports. In addition, any permanent emission unit shutdowns must be reported in accordance with

Condition I.D.2-Permanent Shutdown of an Emission Unit, above. The monitoring reports must be certified by a responsible official. SRCAA has added language to this condition that if monitoring reports are required, by an underlying requirement, to be submitted more frequently than every six months, the responsible official certification is only required for the semiannual reports but that the certification must cover all reports submitted since the last certification. The addition of this last requirement meets the intent of the law in that all reports are certified, while minimizing the burden on a source to go to the responsible official every time a report is submitted. Allowing a source this flexibility could become more important in the future, e.g., if SRCAA were to require a source to submit monitoring data electronically or by some other real time mechanism where responsible official certification would be difficult, if not impossible. [WAC 173-401-615(3)(a), 9/16/02]

I.D.7. Prompt Reporting of Deviations. The permittee shall promptly report deviations from permit requirements, including:

- Deviations attributable to upset conditions, as defined in this permit;
- Excess emissions due to emergencies (see Condition I.C.1) and/or scheduled maintenance; and
- Any time a startup, shutdown, breakdown, or upset condition occurs which resulted in excess emissions or could result in an emissions violation or a violation of an ambient air quality standard.

Reports of deviations shall include the probable cause of such deviations, and any corrective actions or preventative measure taken. Prompt means reporting according to the shortest time period, which applies to the situation, as listed below:

- a. In the case where the deviation represents a potential threat to human health or safety, the deviation shall be reported by phone or facsimile as soon as possible, but no later than 12 hours after the deviation is discovered;
- b. In the case where an affirmative defense is sought under Condition I.C.1- Emergencies, Condition I.C.2-Excess Emissions and/or Condition I.C.3-Report of Breakdown, and in the case where an unplanned condition, such as a breakdown or upset occurs, which could result in an emissions violation or violation of an ambient air quality standard, the deviation shall be reported by phone or facsimile as soon as possible, but no later than the end of the next working day; and
- c. For all other deviations, the deviation shall be reported as part of the next monitoring report, or no later than 30 days after the end of the month during which the deviation is discovered, whichever is sooner.

The permittee shall maintain a contemporaneous record of all deviations.

[Streamlined condition for the notification requirements in: WAC 173-401-615(3)(b), 9/16/02; WAC 173-401-645(3)(d), 10/4/93; WAC 173-400-107(3), 3/1/11; SRCAA

Regulation I, Section 6.08.A.1, 3/4/04 – STATE/LOCAL ONLY]

I.D.8. Emission Inventory. The permittee must submit an inventory of emissions from the source each year and must maintain records sufficient to document reported emissions. [WAC 173-400-105(1), 8/20/93] [WAC 173-400-105(1), 5/31/16 – STATE/LOCAL ONLY]

I.D.9. Reporting of Emissions of Greenhouse Gases. The permittee shall comply with the applicable requirements given in Chapter 173-441 WAC related to the reporting of emissions of greenhouse gases. [Chapter 173-441 WAC, 9/15/16 – STATE/LOCAL ONLY]

I.D.10. Insignificant Emission Units. Emissions from emission units, designated insignificant based solely on WAC 173-401-530(1)(a), must remain below threshold levels. Upon request from SRCAA, the permittee must demonstrate that the actual emissions from such a unit or activity are below the applicable emission thresholds. [WAC 173-401-530(6), 9/16/02]

I.D.11. Report Submittals. This term provides the address to which reports must be sent and requires all reports to be certified by a responsible official. [WAC 173-401-520, 10/4/93]

I.D.12. Rendering Device or Method Inaccurate. The permittee may not render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(8), 9/20/93] [WAC 173-400-105(8), 5/31/16 – STATE/LOCAL ONLY]

I.E. Compliance Certification

As part of SRCAA's Title V program, sources are required to submit annual compliance certifications. (SRCAA may require more frequent certifications if the source is out of compliance or if an underlying requirement specifies more frequent submittals.) This subsection addresses the details of these compliance certification submittals including, how often submittals must occur, what the submittals must contain and to whom the certifications must be sent. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

I.E.1. Compliance Certification Submittals. This term covers the frequency for submitting compliance certifications. [WAC 173-401-630(5)(a), 2/3/16]

I.E.2. Compliance Certification Contents. This term describes what must be included in each compliance certification. [WAC 173-401-630(5)(c), 2/3/16] [WAC 173-401-530(1)(d), 9/16/02]

I.E.3. Credible Evidence. For the purpose of submitting compliance certifications or establishing violations of any standard approved in the SIP and any standard in 40 CFR

Part 60, the permittee shall not preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 52.12, 2/24/97] [40 CFR 52.33, 2/24/97] [40 CFR 60.11(g), 10/17/2000] [WAC 173-400-115, 5/31/16]

I.E.4. Submittal to EPA. This term requires that certifications be sent to EPA as well as SRCAA. [WAC 173-401-630(5)(d), 2/3/16]

I.F. Truth and Accuracy of Statements and Documents and Treatment of Documents

Below are standard terms contained in the subsection, Truth and Accuracy of Statements and Documents and Treatment of Documents. The terms are based on SRCAA's Regulation I. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

I.F.1. False Information. The permittee may not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(6), 8/20/93] [WAC 173-400-105(6) 5/31/16 – STATE/LOCAL ONLY] [SRCAA Regulation I, 2.08.A & E, 3/4/04 - STATE/LOCAL ONLY]

I.F.2. Alteration of Documents. This term prohibits the reproduction or alteration of any document issued by SRCAA, if the purpose of such is to evade or violate any requirement. [SRCAA Regulation I, 2.08.B, 3/4/04 - STATE/LOCAL ONLY]

I.F.3. Availability of Documents. Any order required to be obtained by SRCAA Regulation I must be available for inspection on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 8/3/04 - STATE/LOCAL ONLY]

I.F.4. Posting of Notices. Notices which SRCAA requires to be displayed shall be posted. The permittee may not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA Board of Directors or their authorized representatives. [SRCAA Regulation I, 2.08.D, 8/3/04 - STATE/LOCAL ONLY]

I.G. Applicable When Triggered Requirements

The Applicable When Triggered Requirements subsection contains requirements that do not apply to the facility unless certain activities at the site trigger the requirement. SRCAA has included these requirements in the permit, either because they are often triggered at sources or are important enough that their inclusion in the permit is warranted. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the term, Source Testing, language has been added to clarify what an approved test method is, as the rule does not elaborate on what “approved” means. The discussion below provides more detail in regards to this.

I.G.1. New Source Review. Prior to the establishment of a new source, including modifications, the permittee may be required to file and obtain approval under SRCAA's Notice of Construction program. [Chapter 173-400 WAC 5/31/16 – STATE/LOCAL ONLY] [Chapter 173-460 WAC, 5/20/09 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 5/3/07 - STATE/LOCAL ONLY] [NOC #378, Condition 9, 3/19/92 as revised on 5/31/01, 8/30/02 & 9/2/16]

I.G.2. Replacement or Substantial Alteration of Existing Control Equipment. Prior to replacing or substantially altering existing control equipment, the permittee shall file and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-114, 11/28/12 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 5/3/07 - STATE/LOCAL ONLY] [NOC #378, Condition 9, 3/19/92 as revised on 5/31/01, 8/30/02 & 9/2/16]

I.G.3. Demolition and Renovation (Asbestos). The permittee must comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR 61 Subpart M, 2006] [WAC 173-400-075, 5/31/16] [SRCAA Regulation I, Article IX, 8/5/10 - STATE/LOCAL ONLY]

I.G.4. Source Testing. To demonstrate compliance Ecology or SRCAA may conduct or require that a test be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61, and 63 which are adopted by reference or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology, as of September 20, 2004, on file at Ecology. All testing shall be performed in accordance with SRCAA Regulation I, Section 2.09, "Source Tests." The permittee may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emission unit. Ecology or SRCAA shall be allowed to obtain a sample from any emission unit. The permittee shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

Methods or procedures shall be considered approved if the source submits a source test plan to SRCAA at least 30 days prior to the testing date, or a shorter time if designated in writing by SRCAA, and SRCAA approves the plan in writing. In order to maintain the approved status for the methods and/or procedures, any changes to the plan shall be approved by SRCAA in writing prior to implementation.

[WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 5/31/16 - STATE/LOCAL ONLY] [WAC 173-401-615(1), 9/16/02] [SRCAA Regulation I, Section 2.09, 2/7/08]

I.G.5. Chemical Accident Prevention Provisions. If regulated substances are stored on-site in quantities, at the process level, that are above the threshold quantities, as determined under 40 CFR §68.115, the permittee shall comply with the requirements of 40 CFR Part 68 - Chemical Accident Prevention Provisions no later than either three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR §68.130, or the date on

which a regulated substance is first present above a threshold quantity in a process.[40 CFR Part 68, 2006]

II. EMISSION LIMITATIONS & MONITORING, RECORDKEEPING, AND REPORTING

This section contains emission limitations and emission related requirements, including general requirements for the facility. The section is divided into several subsections. The first subsection lists limitations that apply facility-wide. Subsequent subsections focus on individual emission units or classes of similar emission units. As in all other sections of the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation.

This section of the permit is formatted differently from the STANDARD TERMS AND CONDITIONS section. Requirements are listed in columns. The actual requirement is given in the third column of the table. The regulatory basis for the applicable requirements is listed in the second column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, are listed in the fourth and fifth columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to determine compliance with the requirement are listed in the last column of the emission limitation tables.

The MRRR are enforceable and are given in the last subsection of the permit. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying requirement.

For the Northside landfill, this section contains four subsections:

FACILITY-WIDE EMISSION LIMITATIONS (Section II.A)
MUNICIPAL SOLID WASTE (MSW) LANDFILL EMISSION LIMITATIONS (Section II.B);
ACTIVE LANDFILL GAS COLLECTION AND CONTROL SYSTEM EMISSION
LIMITATIONS (Section II.C); and
MONITORING, RECORDKEEPING, & REPORTING REQUIREMENTS (Section II.D))

The subsections and their contents are discussed in detail below except that rather than listing all MRRR at the end, MRRR are discussed in context of the applicable requirement(s) to which they apply.

If an applicable requirement is included in the permit, but was not included in the source's application, a note to this effect can be found after the citation.

If an applicable requirement does not include sufficient monitoring, recordkeeping, and reporting to satisfy WAC 173-401-615(1) & (2), the permit will establish adequate monitoring, recordkeeping and reporting. This is known as gapfilling. Applicable requirements for which gapfilling is proposed can be identified by the note, following the MRRR citation, indicating that at least a portion of the MRRR is from gapfilling.

II.A. Facility-wide Emission Limitations

This subsection contains applicable emission limitations that apply facility-wide. The facility-wide emission limitations apply to insignificant emissions units. However, monitoring, recordkeeping and reporting requirements are not required for the insignificant emission units listed in Table 5 because SRCAA has determined that they are not necessary to assure compliance with facility-wide emission limitations. The permittee is required to certify compliance with the facility-wide emission limitations for insignificant emission units (see Condition I.E.2).

This requirements of this subsection, and corresponding MRRR reference (if applicable), are discussed below.

Condition II.A.1: All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040. [WAC 173-400-040, 8/20/93] [WAC 173-400-040, 5/31/16 – STATE/LOCAL ONLY]

NOTE: Per WAC 173-400-070, this requirement does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under Section II.B of permit)

MRRR: No monitoring is required. As with all permit terms, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period

Condition II.A.2: Visible emissions may not exceed 20% except as allowed in WAC 173-400-040. [WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 8/20/93] [WAC 173-400-040(2), 5/31/16 – STATE/LOCAL ONLY]

NOTE: Per WAC 173-400-070, this requirement does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under section II.B of permit)

MRRR: The permittee must perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of potential visible emissions and PM emissions from all emission units listed in Tables 3 & 4 above.

If visible emissions are observed during an inspection or are otherwise observed by the permittee, the permittee shall verify and certify that:

1. the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
2. the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and

3. if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If 1., 2., and/or 3. are not being met, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

If visible emissions are still observed and 1., 2., and 3. are being met, the permittee shall perform or have performed, RM 9 (July 1, 1993) or Ecology Method 9A (September 20, 2004), whichever is applicable, on the source of the visible emissions. The test shall occur within a reasonable timeframe but no later than 24 hours after discovery of the emissions. If the visible emissions exceed the applicable standard, the permittee shall take timely and appropriate corrective action (as soon as possible, but within 24 hours) to address the problem. The results of the RM 9 or Ecology Method 9A test shall be submitted to SRCAA within two working days of the test.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

[WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 2/19/91] [WAC 173-400-050(1), 5/31/16 – STATE/LOCAL ONLY] [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 5/31/16 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 5/31/16 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

Condition II.A.3: Visible Emissions shall not equal or exceed 20%, as specified in SRCAA Regulation I, 6.02 - STATE/LOCAL ONLY [SRCAA Regulation I, 6.02, 3/4/04 - STATE/LOCAL ONLY]

MRRR: The same monitoring is required as for Visible Emissions, WAC 173-400-040, given in Condition II.A.2. [WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 2/19/91] [WAC 173-400-050(1), 5/31/16 – STATE/LOCAL ONLY] [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 5/31/16 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 5/31/16 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

Condition II.A.4: No person shall cause or permit the emission of particulate matter from any source to be deposited (fallout) beyond the property under direct control of the owner or operator of the source in sufficient quantity to unreasonably interfere

with the use and enjoyment of the property upon which the material is deposited.

[WAC 173-400-040(3), 5/31/16 - STATE/LOCAL ONLY] [SRCAA Regulation I, Section 6.05.A, 3/4/04 (11/12/93)]

NOTE: Per WAC 173-400-070, this requirement does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under section II.B of permit)

MRRR: The permittee must perform weekly inspections of the facility during daylight hours while the facility is operating to verify that fallout is not occurring and must record and investigate complaints received regarding fallout.

Potential fugitive emissions from the facility include dust from haul roads at the landfill. Weekly inspections should reasonably assure compliance because the Northside Landfill has a consistent compliance history (i.e., the likelihood of violation is low). During normal operation, fugitive particulate matter is not been visible at the facility.

If potential violations of the requirement are observed during the weekly inspections and/or as part of the complaint investigation, the permittee must take timely and appropriate corrective action.

Taking corrective action does not relieve the permittee from the obligation to comply with the underlying emission limitation, nor does it relieve the permittee from reporting any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

The permittee must maintain records of each inspection and complaint investigation. Records must include the date and time of the inspection, observations made, the date and time of any complaints received, the date and time of the complaint investigation, the results of complaint investigations, a description of any corrective action taken, and any other information required in permit Condition I.D.1-Records of Required Monitoring Information. Records must be kept in accordance with Condition I.D.5-Retention of Records, and, upon request, such records must be made available for inspection by SRCAA staff or other authorized representatives.

For permit conditions that require reasonable precautions to be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, examples of reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures are given in the permit.

[WAC 173-401-615(1) &(2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.5: Reasonable precautions must be taken to:

- a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads;
- b. Prevent tracking of PM onto paved roadways open to the public;
- c. Prevent the release of air contaminants, as specific in WAC 173-400-040(4)(a), if located in an attainment area and not impacting a NAA;
- d. Prevent PM from becoming airborne when handling, transporting, and /or storing PM; and
- e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.

[SRCAA Regulation I, 6.05.C, 3/4/04] [SRCAA Regulation I, 6.05.D, 3/4/04]
[WAC 173-400-040(4)(a), 5/31/16(8/20/93 was WAC 173-400-040(3)9a))]]
[SRCAA Regulation I, Section 6.05.B, 3/4/04] [WAC 173-400-040(9)(a),
5/31/16(8/20/93)]

NOTE: Per WAC 173-400-070, WAC 173-400-040(4)(a) and 173-400-040(9) do not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under section II.B of permit)

MRRR: The same monitoring is required as for WAC 173-400-040(3) – Fallout, given in Condition II.A.4. The permittee must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02]
NOTE: This is a gapfilling MRRR.

Condition II.A.6: Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(5).

[WAC 173-400-040(5), 5/31/16- STATE/LOCAL ONLY]

NOTE: Per WAC 173-400-070, WAC 173-400-040(5) does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(9) (covered under Section II.B of permit)

MRRR: The monitoring is the same as required for WAC 173-400-040(3) - Fallout, given in Condition II.A.4. The permittee must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.7: It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as

is, or is likely to be:

- a. Injurious to the health and safety of human, animal or plant life;
- b. Injurious or cause damage to property; or
- c. Which unreasonably interferes with enjoyment of life and property.

Compliance with this requirement shall be determined per the provisions given in SRCAA Regulation I, Section 6.04 (4/2/10).

[SRCAA Regulation I, Section 6.04, 4/2/10- STATE/LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(3) - Fallout, given in Condition II.A.4, which also pertains to odors. The permittee must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.8: No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business

[WAC 173-400-040(6), 5/31/16(8/20/93)] [SRCAA Regulation I, 6.06.A, 3/4/04 - STATE/LOCAL ONLY]

NOTE: Per WAC 173-400-070, WAC 173-400-404(6) does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under Section II.B of the permit)

MRRR: The monitoring is the same as for WAC 173-400-040(3) - Fallout, given in Condition II.A.4. The permittee must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.9: No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC

[WAC 173-400-040(8), 5/31/16(8/20/93)] [SRCAA Regulation, 6.07, 3/4/04 - STATE/LOCAL ONLY]

NOTE: Per WAC 173-400-070, WAC 173-400-404(7) does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under Section II.B of permit)

MRRR: No monitoring is required. As with all permit terms, the permittee must certify compliance with this condition annually, which includes making a reasonable

inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition II.A.10: Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3). NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY. This exception allows for an alternate correction to measured concentrations (other than 7% oxygen) if determined by SRCAA to be representative of normal operations.

[WAC 173-400-050(1) & WAC 173-400-050(3), 2/19/91] [WAC 173-400-050(1) & -050(3), 5/31/16 – STATE/LOCAL ONLY] [NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY]

NOTE: Per WAC 173-400-070, this requirement does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under Section II.B of permit)

MRRR: The same monitoring is required as for Visible Emissions, WAC 173-400-040, given in Condition II.A.2. Because of the general correlation between particulate matter emissions and visible emissions (i.e., visible emissions are an indicator of particulate matter), the monitoring focuses on identifying visible emissions. Weekly inspections should reasonably assure compliance because the Northside Landfill has a consistent compliance history. Additionally, all of the combustion units (i.e., flares) burn only LFG and propane (for start-up), which are relatively clean burning fuels which do not create high levels of particulate emissions when burned in properly operated combustion units. The permit limits the flares to the use of propane (LPG) and landfill gas. [WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 2/19/91] [WAC 173-400-050(1), 5/31/16 – STATE/LOCAL ONLY] [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 5/31/16 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 5/31/16 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

Condition II.A.11: Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060. [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 5/31/16 – STATE/LOCAL ONLY]

NOTE: Per WAC 173-400-070, this requirement does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under section B of permit)

MRRR: The same monitoring is required as for Visible Emissions, WAC 173-400-040, given in Condition II.A.2. Because of the general correlation between particulate matter emissions and visible emissions (i.e., visible emissions are an indicator of particulate matter), the monitoring focuses on identifying visible emissions. Weekly inspections should reasonably assure compliance because the Northside

Landfill has a consistent compliance history. [WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 2/19/91] [WAC 173-400-050(1), 5/31/16 – STATE/LOCAL ONLY] [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 5/31/16 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 5/31/16 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

Condition II.A.12: SO₂ emissions from each unit shall not exceed 1000 ppm on a dry basis corrected to 7% oxygen, as specified in WAC 173-400-040(7). [WAC 173-400-040(7), 5/31/16(8/20/93)]

NOTE: The second paragraph of WAC 173-400-040(7) is STATE/LOCAL ONLY]

NOTE: Per WAC 173-400-070, this requirement does not apply to the MSW landfill cells subject to the requirements of WAC 173-400-070(8) (covered under section II.B of permit)

MRRR: Because SO₂ emissions at this source would only occur from the three landfill gas flares, monitoring for this requirement consists of using only allowed fuels. The permit limits the source to the use of propane (Liquid Petroleum Gas) and landfill gas. Based on the source testing that has been done on the landfill flares, SO₂ emissions will not exceed 1000 ppm at 7% O₂ while burning landfill gas. The most recent source testing of emissions from flare indicated measured SO₂ concentrations less than 1 ppmv (corrected to 7% O₂). Therefore, when burning the allowable fuels, the SO₂ emission limit of 1000 ppm @ 7% oxygen will not be exceeded. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition II.A.13: No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200. [WAC 173-400-200, 1/10/05(2/19/91)]

NOTE: Per WAC 173-400-200(1)(c), this requirement does not apply to the three landfill flares at the facility.

MRRR: No monitoring is required. As with all permit terms, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition II.A.14: No varying of emissions according to atmospheric conditions or ambient concentrations is allowed, except as allowed under WAC 173-400-205. [WAC 173-400-205, 2/19/91]

MRRR: No monitoring is required. As with all permit terms, the permittee must certify compliance with this condition annually, which includes making a reasonable

inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition II.A.15: No outdoor burning, except as allowed under Chapter 173-425 WAC and/or SRCAA Regulation I, 6.01. [Chapter 173-425 WAC, 3/13/00(10/18/90)] [SRCAA Regulation I, 6.01, 10/3/13 - STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition II.A.16: Handling and use of chlorofluorocarbons (CFCs) must be in accord with 40 CFR Part 82. [40 CFR Part 82, 2006 (except those subparts for which a shield is granted in Section III below)]

MRRR: No monitoring is required. As with all permit terms, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Some conditions have been removed from the facility-wide emission limitations because SRCAA has determined these conditions are not applicable to the Northside Landfill. These conditions are listed below and are not included in the Northside Landfill's operating permit.

CITATION	DESCRIPTION	REASON NOT INCLUDED IN THE PERMIT
SRCAA Regulation I, 6.14.D.1, 5/3/07(11/12/93) - STATE/LOCAL ONLY]	Fines content of traction sanding materials must not equal or exceed 3% fines or 25% durability index.	The requirements given in SRCAA Regulation I, Section 6.14 were written to cover emissions from paved public roadways maintained by government agencies, not paved surfaces at facilities owned by government agencies. There are other rules and requirements that apply to the facility which require control of fugitive emissions from paved surfaces at this facility, including Conditions II.A.4 and II.A.5. As a result, SRCAA Regulation I, Section 6.14 does not apply to this facility.
SRCAA Regulation I, 6.14.D.2, 5/3/07(1/7/99)	No contract for traction sanding materials shall be executed unless it includes the standards	The requirements given in SRCAA Regulation I, Section 6.14 were written to cover emissions from

	set forth in SRCAA Regulation I, 6.14.D.1.	paved public roadways maintained by government agencies, not paved surfaces at facilities owned by government agencies. There are other rules and requirements that apply to the facility which require control of fugitive emissions from paved surfaces at this facility, including Conditions II.A.4 and II.A.5. As a result, SRCAA Regulation I, Section 6.14 does not apply to this facility.
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B. Municipal Solid Waste (MSW) Landfill Emission Limitations

This subsection contains the requirements of WAC 173-400-070(8) which apply to the municipal solid waste (MSW) landfill. Per EPA, the requirements of 40 CFR 60, Subpart Cc, which are implemented through WAC 173-400-070(8), only apply to the landfill cells. The specific emission units covered in this section of the permit are listed in Table 2 on Page 11.

It should be noted that although landfill gas from the closed portion of the landfill is collected and controlled through an active flare system, a collection and control system is not required under WAC 173-400-070(8) because the uncontrolled landfill emissions are below 50 megagrams per year. If the uncontrolled emissions from the landfill exceed 50 megagrams per year in the future, a collection and control system will be required under WAC 173-400-070(8).

This requirements of this subsection, and corresponding MRRR reference (if applicable), are discussed below.

Condition II.B.1: If the landfill has a nonmethane organic compound (NMOC) emission rate of 50 megagrams per year or greater, the permittee must comply with all of the requirements of WAC 173-400-070(8), including the requirement to install a gas collection and control system that meets the requirements of 40 CFR 60.752(b)(2)(ii)-(v), within thirty (30) months of the date when the NMOC emission rate reached or exceeded 50 megagrams. The systems must follow the operational standards in 40 CFR 60.753. [WAC 173-400-070(8)(e)(f) & (g), 5/31/16] [40 CFR 60.752(b), 2006]

MRRR: The MRRRs for this condition are described in 40 CFR 60, Subpart Cc, which are implemented through WAC 173-400-070(8). The permittee must calculate the NMOC emission rate using the equations and procedures provided in 40 CFR 60.754(a) which include three Tiers. If the results of Tier 1 indicate emissions above 50 MG, the facility can either install the required equipment or can move to a Tier 2 calculation which includes measuring site specific NMOC concentrations. If Tier 2 calculation is above 50 MG, the facility can go on to Tier 3 which includes further site-specific measurements. If the calculated NMOC emission

rate is less than 50 megagrams per year, the permittee must submit an annual emissions rate report (described below).

When determining the site specific NMOC concentration (Tier 2), the sampling procedure given in 40 CFR 60.754(a)(3) shall be used, except as allowed in EPA's letter dated August 28, 2000 (letter from Doug Hardesty to Steffan Johnson of Horizon Engineering). If Tier 2 is used, the permittee must retest the site-specific NMOC concentration every 5 years beginning in August 2005.

When determining the site-specific methane generation rate constant (Tier 3), the procedures provided in Method 2E of 40 CFR 60 Appendix A shall be used. The permittee shall estimate the NMOC mass emission rate using the equations provided in CFR 60.754(a)(1)(i) or (ii) and using a site-specific methane generation rate constant and the site-specific NMOC concentration from the collected samples instead of the default values in the equation. The calculation of the methane generation rate constant is performed only once, and the value obtained is used in all subsequent annual NMOC emission rate calculations.

If the NMOC mass emission rate is equal to or greater than 50 megagrams per year, the permittee shall comply with 40 CFR 60.752(b)(2).

The permittee may use other methods to determine the NMOC concentration or a site-specific methane generation constant as an alternative to the methods required in 40 CFR 63.754 if the method has been approved by EPA as provided in 40 CFR 60.752(b)(2)(i)(B).

The permittee must submit an annual NMOC rate report to EPA and SRCAA by September 20th each year, except as provided for in 40 CFR 60.757(b)(1)(ii). The NMOC emission rate report shall contain an annual or 5-year estimate of the NMOC emission rate calculated used the formula and procedures provided in 40 CFR 60.754(a). The NMOC emission rate report must also include all the data, calculations, sample reports and measurements used to estimate the annual or 5-year emissions.

If the estimated NMOC emission rate as reported in the annual report is less than 50 megagrams per year for five consecutive years, the permittee may submit an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual report. The estimate shall include the current amount of solid waste in-place and the estimated waste acceptance rate for each year of the 5 years for which a NMOC emission rate is estimated. All data and calculations upon which this estimate is based shall be provided to EPA and SRCAA. This estimate shall be revised at least once every 5 years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the 5-year estimate, a revised 5-year estimate shall be submitted to EPA and SRCAA. The revised estimate shall cover the 5-year period beginning with the year in which

the actual waste acceptance rate exceeded the estimated waste acceptance rate.

The permittee must keep for at least 5 years up-to-date, readily accessible, on-site records of the maximum design capacity, the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.

If the landfill is permanently closed, the permittee must submit a closure report to EPA and SRCAA within 30 days of waste acceptance cessation. EPA and/or SRCAA may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR 258.60. If a closure report has been submitted to EPA and SRCAA, no additional wastes may be placed into the landfill without filing a notification of modification as described under 40 CFR 60.7(a)(4).

[40 CFR 60.754, 2001] [40 CFR 60.757(b), 2001] [40 CFR 60.758(a), 2001] [40 CFR 60.757(d), 2001] [WAC 173-400-070(8)(e), 5/31/16] [NOC #378, Condition 7, 3/19/92 as revised on 5/31/01, 8/30/02, & 9/2/16]

Some requirements from WAC 173-400-070(8) are one time requirements that have already been satisfied. These requirements are listed below and are not included in the Northside Landfill's operating permit.

CITATION	DESCRIPTION	REASON NOT INCLUDED IN THE PERMIT
<p>WAC 173-400-070(8)(d)(i), 5/31/16</p> <p>40 CFR 60.757(a), 2000</p>	<p>The initial design capacity report for the facility is due before September 20, 2001</p>	<p>The City of Spokane submitted the initial design capacity report to SRCAA on June 15, 2000 (report dated April 10, 2000). The report showed a design capacity of 3.62 million megagrams (3.01 million megagrams from the closed portion of the landfill and 0.61 million megagrams from the MSW cell).</p>
<p>WAC 173-400-070(8)(d)(ii), 5/31/16</p> <p>40 CFR 60.757(b), 2001</p>	<p>The initial NMOC emissions rate report is due before September 20, 2001</p>	<p>The City of Spokane submitted the initial NMOC emissions rate report to EPA in 2000 (report dated December 15, 2000). Based on the initial emissions rate report, the uncontrolled emissions from the Northside Landfill</p>

		(both closed portion and MSW cell) were 25.9 megagrams per year.
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C. Active Landfill Gas Collection and Control System Emission Limitations

This subsection of the permit covers the active landfill gas collection and control system (three landfill gas flares). The requirements that apply to this system are established in Notice of Construction (NOC) #378 which was issued under SRCAA's new source review program. The specific emission units covered in this section of the permit are given in Table 3 on Page 11.

This requirements of this subsection, and corresponding MRRR reference (if applicable), are discussed below.

Condition II.C.1: A copy of the Notice of Construction and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request. [NOC #378, Condition 1, 3/19/92 as revised on 5/31/01, 8/30/02, & 9/2/16]

MRRR: No monitoring is required. As with all permit terms, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition II.C.2: All landfill gas, collected in the active collective system, shall be vented to the flare. The flare shall be operating whenever landfill gas is directed to the flare. SRCAA approval is required prior to uncontrolled exhausting of landfill gas, collected in the active collection system, to the atmosphere. [NOC #378, Condition 2 , 3/19/92 as revised on 5/31/01,8/30/02, & 9/2/16]

MRRR: No monitoring is required. As with all permit terms, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period

Condition II.C.3: Each flare shall operate at a minimum temperature of 1400° F and shall have a minimum retention time of 0.6 seconds. [NOC #378, Condition 3, 3/19/92 as revised on 5/31/01,8/30/02, & 9/2/16]

MRRR: Each operating flare is required to be equipped with a temperature sensor and recorder, which operate continuously. The temperature sensor must be placed at least 3 feet upstream from the top of the flare and at least 0.6 seconds downstream from the burner.

Records are required to be kept for each operating flare, in accordance with the following:

- a. The combustion zone temperature in each flare shall be continuously monitored whenever the flare is in operation. The combustion zone temperature shall be averaged and recorded at least once every two minutes whenever each flare is in operation (i.e., average temperature during each two minute monitoring period). Each operating flare shall be equipped with a system that will automatically shut down the flare within three minutes of the temperature decreasing to 1425° F or lower and display an alarm with the cause of the flare shutdown. The cause of each flare shutdown must be investigated and corrective action(s) taken prior to restarting the flare. Records must be kept of all flare shutdowns and the corrective action(s) taken.
- b. The volumetric flow rate of landfill gas entering each flare shall be measured and recorded at least three times every week.
- c. At least once every week, either i) the energy (in BTU/ft³) content, or ii) the methane concentration (in percent by volume) of the landfill gas, shall be measured and recorded.
- d. For each operating flare, valid combustion zone temperatures shall be recovered for at least 90% of the monitoring periods during each month. Periods that the flare does not operate and periods during which an unavoidable monitoring system malfunction occurred are not included in the data recovery calculation to determine if the 90% data recovery requirement was met for each flare. In determining whether a monitoring system malfunction was unavoidable, the following criteria shall be considered:
 - i. whether the malfunction was caused by poor or inadequate operation, maintenance, or any other reasonably preventable condition;
 - ii. whether the malfunction was of a recurring pattern indicative of inadequate operation or maintenance; and
 - iii. whether the permittee took timely and appropriate action as expeditiously as practicable to correct the malfunction.

A report shall be filed with SRCOA no later than 30 days after the end of every month during which combustion zone temperature data was recovered for less than 90% of the monitoring periods. The report shall provide the reason the data was not collected (e.g., a description of the malfunction), information regarding operation of the monitored process during the monitoring system malfunction (e.g., process parameters which would be indicative of the compliance status of the process with applicable requirements), information regarding 1., 2., and 3. of this condition, and any further actions that the permittee will take to ensure adequate collection of

such data in the future.

- e. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

In addition to the records described above, the permittee is required submit an operation and maintenance (O&M) manual for the flares. The most recently submitted O&M manual shall be followed. Records shall be kept of all the dates and nature of maintenance activities performed on the flares. Records shall be kept in accordance with Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

[NOC #378, Conditions 4, 5, 6, & 8, 3/19/92 as revised on 5/31/01, 8/30/02, & 9/2/16]

Condition II.C.4: All flare operators shall be familiar with the operation and maintenance manual, and it shall be kept accessible to the operators. [NOC #378, Condition 8, 3/19/92 as revised on 5/31/01, 8/30/02, & 9/2/16]

MRRR: The permittee is required submit an operation and maintenance (O&M) manual for the flares. The most recently submitted O&M manual shall be followed. Records shall be kept of all the dates and nature of maintenance activities performed on the flares. Records shall be kept in accordance with Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

[NOC #378, Condition 8, 3/19/92 as revised on 5/31/01, 8/30/02, & 9/2/16] [WAC 173-401-615(1) & (2), 9/16/02] - NOTE: portions of this MRRR are gapfilled.

Some conditions of the originally approved and subsequent revisions of Notice of Construction, NOC #378, for the active landfill gas collection and control system are no longer applicable, because they are one time requirements that have been satisfied. These conditions are listed below and are not included in the Northside Landfill's operating permit.

CITATION	DESCRIPTION	REASON NOT INCLUDED IN THE PERMIT
NOC #378, Condition 5, 3/19/92 as revised on 5/31/01. This Condition was eliminated in the revision dated 8/30/02	The owner or operator shall conduct source testing within 180 days of start-up to determine actual emissions from each flare.	Initial source testing was conducted in 1993. Since that time, one flare has been tested in each of the following years: 1994, 1995, 1996, 1997, 1998, 2000, 2002, 2005, 2010, and 2015.

<p>NOC #378, Condition 2, 3/19/92 as revised on 5/31/01. This Condition was eliminated in the revision dated 8/30/02</p>	<p>The actual retention time for each flare shall be verified by SRCAA using the results from the source test required in Condition #5.</p>	<p>Each flare has already been source tested at least once. The actual retention time for each flare has already been verified by SRCAA.</p>
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SECTION III - PERMIT SHIELD

Section III of the permit lists regulations for which the facility has requested, and SRCAA proposes to grant, a permit shield per WAC 173-401-640(2). SRCAA review and findings regarding on whether a shield will be granted are summarized in subsections A and B below.

A. Inapplicable Requirements For Which a Shield Will Be Granted

1PS. Air Quality Regulations Applicable to Emissions from Private Commercial Power projects Located on the Site.

Findings: Periodically, the City of Spokane has entered into contracts with private commercial power generators to lease the landfill gas and space at the landfill in order establish and operate equipment that converts the landfill gas to electricity. According to the federal definition of a “stationary source,” all emission units are included that are 1) of the same industrial grouping, 2) on contiguous or adjacent lands, and 3) under common control. To be considered part of the “major stationary source” that includes all of the emission units at the Northside Landfill, commercial power generation projects and associated equipment would have to be under the control of the City of Spokane, or a support facility for the Northside Landfill. To be considered a “support facility,” the equipment must be integral to the operation of the source (i.e., be something that the Northside Landfill cannot function without). Since any emission units associated with past or current commercial power generation projects are not under the control of the City of Spokane and are not a “support facility,” the emission units are not part of the stationary source. Therefore, the requirements associated with past or current commercial power generation projects are not applicable requirements and are not included in the air operating permit for the Northside Landfill.

2PS. 40 CFR 60, Subpart WWW, 2001 (New Source Performance Standards for Municipal Solid Waste Landfills)

Findings: Municipal solid waste landfills that commenced construction, reconstruction, or modification after May 30, 1991 are subject to the requirements of 40 CFR 60 Subpart WWW. Construction of a new cell (MSW cell) at the Northside Landfill was commenced in 1991. Per a letter dated August 3, 1998 from EPA (letter from Gil Haselberger to Lloyd Brewer), the activities involved in the construction of the new cell do not constitute

a modification as defined in 40 CFR Part 60. Therefore, the Northside Landfill is considered an “existing source” as defined in 40 CFR Part 60, so the requirements of 40 CFR 60 Subpart WWW do not apply. The Northside Landfill is subject to the requirements of 40 CFR Part 60 Subpart Cc.

3PS. WAC 173-400-040, WAC 173-400-050, and WAC 173-400-060, 5/31/16 – landfill cells only (Emission Standards for Certain Source Categories)

Findings: WAC 173-400-070(8) establishes emission standards for Municipal Solid Waste (MSW) Landfills. According to WAC 173-400-070, emission units that are covered under WAC 173-400-070 are not required to meet the provisions of WAC 173-400-040, 173-400-050, and 173-400-060. The emission standards contained in WAC 173-400-070(8) are taken from 40 CFR 60, Subpart Cc. Per EPA, the definition of MSW Landfill includes only the actual landfill cells and does not include other emission units at a landfill facility (e.g., haul roads, flares, etc). Therefore, only the landfill cells are exempted from the requirements of WAC 173-400-040, 173-400-050, and 173-400-060. The other emission units at the facility (e.g., haul roads, flares, etc.) are still required to meet the requirements of WAC 173-400-040, 173-400-050, and 173-400-060. A permit shield from WAC 173-400-040, 173-400-050, and 173-400-050 is granted only for the landfill cells at the facility.

4PS. WAC 173-400-100, 5/31/16; WAC173-400-101, 3/1/11; WAC 173-400-102, 3/1/11; WAC 173-400-103, 3/22/95; & WAC 173-400-104, 3/1/11 (Registration)

Findings: WAC 173-400-100 through -104 contains requirements for certain air contaminant sources to register with the appropriate air pollution control authority. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. In addition, per WAC 173-400-101(7) air operating permit sources are not required to comply with the registration requirements of WAC 173-400-100 through 173-400-104. Because the permittee is an air operating permit source, the rules do not apply.

5PS. 40 CFR 61, Subpart F, 2001 (National Emission Standard for Vinyl Chloride)

Findings: 40 CFR 61, Subpart F applies to plants which produce vinyl chloride by any process. The Northside Landfill does emit small quantities of vinyl chloride in the landfill gas. However, the landfill is not considered a “plant” that “produces” vinyl chloride, so the standard does not apply.

6PS. 40 CFR 61, Subpart V, 2001 (National Emission Standard for Vinyl Chloride)

Findings: 40 CFR 61, Subpart V applies to pumps, compressors, valves, flanges, connectors, etc... that are used in volatile hazardous air pollutant (VHAP) service. VHAP service means that a piece of equipment either contains or contacts a fluid (liquid

or gas) that is at least 10 percent by weight a volatile hazardous air pollutant (VHAP). VHAPs are substances for which equipment leak standards have been promulgated in 40 CFR Part 61, and to date includes benzene and vinyl chloride. Because the landfill gas from the Northside does not contain at least 10% by weight of VHAPs, the rule does not apply.

7PS. Air Quality Regulations Applicable to Emissions from Fuel Storage Tanks

Findings: WAC 173-401-533(2) lists emission units or activities that are exempt from Chapter 173-401 WAC on the basis of size or production rate. Per WAC 173-401-533(2)(c), operation, loading and unloading of storage tanks with capacities less than 10,000 gallons and when storing liquids with vapor pressures < 80 mmHg @ 21°C are considered insignificant emission units and are exempt from Chapter 173-401 WAC. The tank is a split compartment above ground storage tank, with a 500 gallon capacity compartment (for gasoline storage) and a 1,500 gallon capacity compartment (for diesel storage). The fuel storage tank at the Northside Landfill meets the criteria for insignificant emissions units.

8PS. Air Quality Regulations Applicable to Emissions from portable space heater

Findings: WAC 173-401-533(2) lists emission units or activities that are exempt from Chapter 173-401 WAC on the basis of size or production rate. Per WAC 173-401-533(2)(r), fuel fired space heaters and hot water heaters burning kerosene and generating < five million BTU/hr are considered insignificant emission units and are exempt from Chapter 173-401 WAC. The unit has a rated heat output of 70,000 BTU/hr and burns kerosene as the fuel. The space heater in operation at the Northside Landfill meets the criteria for insignificant emissions units.

9PS. Air Quality Regulations Applicable to Emissions from roadways

Findings: Per WAC 173-401-530(1)(d), emission units or activities which generate only fugitive emissions and are subject to no applicable requirement, other than generally applicable state implementation plan requirements, may be considered insignificant emission units. Generally applicable requirements of the state implementation plan are those federally enforceable requirements that apply universally to all emission units or activities without reference to specific types of emission units or activities. WAC 173-400-040(4) and SRCAA Regulation I, Section 6.05(B)-(E) are “generally applicable state implementation requirements” that apply to the roadways at the landfill. Accordingly, the roadways can be considered insignificant under WAC 173-401-530(1)(d).

B. Applicable Requirements For Which a Shield Will Not Be Granted

Gas Collection and Control Requirements – [WAC 173-400-070(9)(d)(ii)]

Findings: This section contains requirements for landfill gas collection and control systems for facilities that are required to install such systems under WAC 173-400-070(8) (i.e., landfills with uncontrolled NMOC emissions above 50 megagrams per year). At the time of permit issuance, the Northside Landfill does not have uncontrolled NMOC emissions above 50 megagrams per year, so these requirements are not triggered. However, during the permit term, if the uncontrolled NMOC emissions exceed 50 megagrams per year, the requirements of WAC 173-400-070(9)(8)(ii) would become applicable. These requirements have been placed in the permit (see Condition II.B.1), to be effective at such time that the NMOC emissions exceed 50 megagrams per year. Since the requirements of WAC 173-400-070(8)(d)(ii) have been placed in the permit, a shield will not be granted.

PREPARED BY: _____
Joe Southwell

DATE: _____

This Statement of Basis and the Operating Permit to which it applies have been reviewed by:

_____, P.E.
April Westby, P.E.

DATE: _____

Julie Oliver, Control Officer

DATE: _____