



Air Quality Permitting Response to Public Comments

March 1, 2018

Tier I Operating Permit No. T1-2017.0049

Project No. 61936

**Pickles Butte Sanitary Landfill
Nampa, Idaho**

Facility ID No. 027-00170

Prepared by:
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AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the draft Tier I operating permit to Pickles Butte Sanitary Landfill from November 21, 2017 through December 21, 2017, in accordance with IDAPA 58.01.01.364. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the draft permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the draft permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

Comment 1: Section 7.4 in DEQ's Statement of Basis states that this facility is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations found in 40 CFR 61. However, toluene – one of the HAPs emitted from this facility at a volume greater than 10 T/yr – is listed as a regulated pollutant under §61.01 of this section. We are concerned that this facility may in fact be subject to the NESHAP regulations found in 40 CFR 61. If this is correct then the final permit must include permit conditions reflecting all applicable requirements stipulated by 40 CFR 61.

Response 1: Pickles Butte Landfill is a major source for HAPs. However, the facility is not an affected source subject to NESHAP regulations contained within 40 CFR Part 61.

Comment 2: Following a period of excessive emissions from this facility, permit condition 3.10 requires PBSL to “reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.”

The municipal solid waste landfill portion of PBSL is presently the only regulated source with emission limits. Although listed as a regulated source, the landfill does not have any control equipment currently installed (Table 5.1 in SOB). We are curious as to what meaningful measures are to be taken in order to comply with permit condition 3.10 in the event that excessive emissions are released.

It seems that the most practical control equipment would be a gas collection system. At present PBSL has yet to exceed the threshold of non-methane organic compounds (NMOC) emissions, which would require them to install and operate a gas collection system. However, installation of a gas collection system would demonstrate compliance with permit condition 3.10 in the event that excess emissions occur. As such, we encourage DEQ to include more detailed language stipulating that a gas collection system must be installed if excess emission events occur at any point during the lifespan of this permit.

Response 2: The PBSL design capacity is greater than 2.5 million megagrams (Mg), and therefore subject to 40 CFR 60 subpart WWW. In accordance with this subpart, the facility is required to obtain a Tier 1 operating permit (T1OP), outlining the monitoring, reporting, and recordkeeping requirements (MRRR) of subpart WWW. Within the Tier 1 operating permit, in accordance with IDAPA 58.01.01.335, the facility is subject to all facility wide requirements listed in the T1OP, in addition to the MRRR of subpart WWW. In this case, the only emissions regulated

are fugitive emissions in the form of fugitive dust or other compounds in the form of odors. Permit Conditions 3.1 through 3.4 address fugitive dust and Permit Conditions 3.5 and 3.6 address odors.

DEQ does not have the authority to stipulate the suggested gas collection system until the NMOC emissions of the MSW landfill reach 50 Mg/yr. At that point, the landfill would be subject to the gas collection requirements of Subpart WWW, including additional reporting and the installation of a gas collection system for emissions control within 30 months.

Comment 3: The community within a 5-mile radius of this site is classified in the 96th percentile relative to the rest of the state for language isolation according to the EPA's EJSCREEN tool. We are curious if DEQ has taken specific measures to reach out to these community members regarding this decision and the impact it may have on them? If so, we request that DEQ elaborate on their efforts in the response to these comments. Further, we encourage DEQ to consider factors such as these in future permitting decisions and include discussion in the Statement of Basis detailing what efforts were taken.

Response 3: DEQ has included a translation option on the public DEQ website at <http://www.deq.idaho.gov/>. Near the upper right-hand corner there is multi-colored language select icon just below the search boxes. This translator is available on all of the pages of the website, including news releases.

Comment 4: DEQ's Statement of Basis notes that PBSL emits toluene above the single HAP threshold of 10 T/yr, designating this as a major source of HAP emissions. We request that DEQ elaborate on the source of toluene emissions from this facility. For example, is this typical for municipal landfills of this size or is PBSL receiving unique or potentially inappropriate waste streams, resulting in the emission of HAPs such as toluene at unusually high levels.

Response 4: The emissions inventory submitted with the application was generated using EPA software, *Landgem, version 3.02*, estimating emissions in a spreadsheet format using EPA AP-42 factors found in AP-42, Vol. I, CH 2.4: Municipal Solid Waste Landfills. Since PBSL accepts both municipal and certain types of non-residential solid waste, such as construction and business waste, a co-disposal emission factor (EF), as shown in Table 2.4-2 of AP-42, Vol. I, CH 2.4, was added for toluene in the calculations to represent worst case emissions from the non-residential waste. This EF results in over four times the estimated emission of toluene from non-residential waste alone, which is added to the estimated emission of toluene from municipal waste.

Comment 5: The "Permit Conditions" and "Operating, Monitoring, and Recordkeeping Requirements" columns in Table 4.2 in the draft permit each have reference errors. The current text reads "Error! Reference source not found." These should be corrected with the correct permit condition numbers and OMR requirements prior to finalizing a permit.

Response 5: DEQ thanks the commenter for finding the error. The typo has been corrected.

Appendix
Public Comments Submitted for
Tier I Operating Permit No.
T-2017.0049



2017-12-06 10:41 AM PST - 1410 N. HILTON ST. BOISE, IDAHO 83706

12/6/17

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Tom Burnham
Air Quality Permitting Analyst
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Submitted via email: tessa.stevens@deq.idaho.gov and tom.burnham@deq.idaho.gov

RE: Draft Tier I Air Quality Permit for Pickles Butte Sanitary Landfill

Dear Ms. Stevens and Mr. Burnham

Thank you for the opportunity to comment on the draft Tier I air quality permit for Pickles Butte Sanitary Landfill (PBSL) in Nampa, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and public lands—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

[Redacted signature area] e any

information on this matter. After reviewing and considering our comments we request that DEQ please provide responses to the issues detailed in our comments.

Sincerely,
A. Hopkins
Austin Hopkins
Conservation Associate

RE: Idaho Conservation League comments on draft Tier 1 air quality permit for Pickles
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NESHAP Applicability

Section 7.4 in DEQ's Statement of Basis states that this facility is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations found in 40 CFR 61. However, toluene – one of the HAPs emitted from this facility at a volume greater than 10 T/yr – is listed as a regulated pollutant under §61.01 of this section. We are concerned that this facility may in fact be subject to the NESHAP regulations found in 40 CFR 61. If this is correct then the final permit must include permit conditions reflecting all applicable requirements stipulated by 40 CFR 61.

Response to Excessive Emission Event

Following a period of excessive emissions from this facility, permit condition 3.10 requires PBSL to "reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken."

The municipal solid waste landfill portion of PBSL is presently the only regulated source with emission limits. Although listed as a regulated source, the landfill does not have any control equipment currently installed (Table 5.1 in SOB). We are curious as to what meaningful measures are to be taken in order to comply with permit condition 3.10 in the event that excessive emissions are released.

It seems that the most practical control equipment would be a gas collection system. At present PBSL has yet to exceed the threshold of non-methane organic compounds (NMOC) emissions, which would require them to install and operate a gas collection system. However, installation of a gas collection system would demonstrate compliance with permit condition 3.10 in the event that excess emissions occur. As such, we encourage DEQ to include more detailed language stipulating that a gas collection system must be installed if excess emission events occur at any point during the lifespan of this permit.

Source Located Within Linguistically Isolate Community

The community within a 5-mile radius of this site is classified in the 96th percentile relative to the rest of the state for language isolation according to the EPA's EJSCREEN tool¹. We are curious if DEQ has taken specific measures to reach out to these community members regarding this decision and the impact it may have on them? If so, we request that DEQ elaborate on their efforts in the response to these comments. Further, we encourage DEQ to consider factors such as these in future permitting

¹ EJSCREEN accessed online via: <https://www.epa.gov/ejscreen>

decisions and include discussion in the Statement of Basis detailing what efforts were taken.

Source of Toluene Emissions

DEQ's Statement of Basis notes that PBSL emits toluene above the single HAP threshold of 10 T/yr, designating this as a major source of HAP emissions. We request that DEQ elaborate on the source of toluene emissions from this facility. For example, is this typical for municipal landfills of this size or is PBSL receiving unique or potentially inappropriate waste streams, resulting in the emission of HAPs such as toluene at unusually high levels.

Errors in Table 4.2 of Draft Permit

The "Permit Conditions" and "Operating, Monitoring, and Recordkeeping Requirements" columns in Table 4.2 in the draft permit each have reference errors. The current text reads "Error! Reference source not found." These should be corrected with the correct permit condition numbers and OMR requirements prior to finalizing a permit.