

Statement of Basis

Tier I Operating Permit No. T1-2019.0004

Project ID 62484

IRSW, LLC

Mayfield, Idaho

Facility ID 039-00020

Final

August 13, 2020

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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

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1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

ASR	auto shredder residue
ACMW	asbestos containing material waste
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CAA	Clean Air Act
CAM	compliance assurance monitoring
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CNMOC	concentration of non-methane organic compound
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Idaho Department of Environmental Quality
EPA	United States Environmental Protection Agency
EPS	Electronic Permit System
GHG	greenhouse gases
gr	grains (1 lb = 7,000 grains)
H ₂ S	hydrogen sulfide
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per consecutive 12-calendar-month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
IWS	Idaho Waste Services, Inc.
lb/hr	pounds per hour
LFG	landfill gas
LFGCCS	landfill gas collection and control system
m ³	cubic meters
MACT	Maximum Achievable Control Technology
Mg	megagrams
MMBtu	million British thermal units
MMscf	million standard cubic feet
MRRR	Monitoring, Recordkeeping and Reporting Requirements
MSW	municipal solid waste
MSWLF	municipal solid waste landfill
NESHAP	National Emission Standards for Hazardous Air Pollutants
NMOC	nonmethane organic compounds
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₂	oxygen
O&M	operation and maintenance
OHV	off-highway vehicles
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers

ppm	parts per million
ppmv	parts per million by volume
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTC	permit to construct
RCRA	Resource Conservation and Recovery Act
Rules	Rules for the Control of Air Pollution in Idaho
scfm	standard cubic feet per minute
SIP	State Implementation Plan
SSM	startup, shutdown, and malfunction
T/yr	tons per consecutive 12-calendar-month period
T1	Tier I operating permit
ULSD	ultra low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

IRWS, LLC operates a municipal solid waste landfill (MSWLF) and active asbestos containing material waste (ACMW) disposal site located at 16415 NW Waste Site Drive, Mayfield Idaho. As of this permits issuance, the facility is not currently classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it does not emit or have the potential to emit any criteria pollutants above the major source threshold of 100 tons-per-year. However, this facility is a landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters it would be required to be subject to the requirements of 40 CFR 60 Subpart WWW. Additionally, the landfill was modified in September of 2015, making it subject to the requirements of 40 CFR 60 Subpart XXX - Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014. Therefore, this facility is required to obtain a Title V permit, as specified in IDAPA 58.01.01.859.04. Since 40 CFR 60 Subpart XXX includes all of the requirements of 40 CFR 60 Subpart WWW, only with different nonmethane organic compounds (NMOC) triggers for installing a landfill gas collection and control system (LFGCCS) and different source test options, only 40 CFR 60 Subpart XXX will be incorporated into this permit.

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for IRWS, LLC.

The facility is changing its name, other than the name change nothing else changes at the facility. The emission inventory and regulatory review remains the same and can be seen in the May 24, 2019, Statement of Basis for T1-2019.0004, project 62164.

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

This permit is an administrative amendment of the facility’s currently effective T I operating permit to change the facility name from Idaho Waste Services, Inc. – Simco Road Landfill to IRWS, LLC.

3.2 Application Chronology

July 29, 2020	DEQ received an application.
August 6, 2020	DEQ made available the draft permit and statement of basis for peer review.

August 13, 2020

DEQ issued the final permit and statement of basis.

4. REVISED PERMIT CONDITIONS

The name of the permittee changed from Idaho Waste Services, Inc. – Simco Road Landfill to IRWS, LLC. All other permit conditions remain unchanged.

5. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.381.02.c, a public comment period is not required for an administrative amendment.

6. EPA REVIEW OF PROPOSED PERMIT

In accordance with IDAPA 58.01.01.381.02.c, EPA review of the proposed permit is not required. EPA will be provided a copy of the revised permit.