

NORTH CAROLINA DIVISION OF AIR QUALITY		Region: Fayetteville Regional Office	
Air Permit Review – Renewal		County: Cumberland	
Permit Issue Date:		NC Facility ID: 2600161	
		Inspector's Name: Mitch Revels	
		Date of Last Inspection: 09/15/2009	
		Compliance Code: 3 / Compliance - inspection	
Facility Data		Permit Applicability (this application only)	
Applicant (Facility's Name): Cumberland Co - Ann Street Landfill		SIP: 15A NCAC 2Q .0513	
Facility Address: Cumberland County - Ann Street Landfill 638 Ann Street Fayetteville, NC 28301		NSPS: N/A	
SIC: 4953 / Refuse Systems		NESHAP: N/A	
NAICS: 562212 / Solid Waste Landfill		PSD: N/A	
Facility Classification: Before: Title V After: Title V		PSD Avoidance: N/A	
Fee Classification: Before: Title V After: Title V		NC Toxics: N/A	
		112(r): N/A	
		Other: N/A	
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 2600161.09A
Robert Howard Director 698 Ann Street Fayetteville, NC 28301 (910) 321-6913	Jeannette Council Chairman PO Box 1829 Fayetteville, NC 28302 (910) 678-7771 jcouncil@co.cumberland.nc.us	Robert N. Stanger County Engineer 698 Ann Street Fayetteville, NC 28301 (910) 321-6913 rstangler@co.cumberland.nc.us	Date Received: 05/28/2009
			Application Type: Renewal
			Application Schedule: TV-Renewal
			Existing Permit Data
			Existing Permit Number: 08846/T04
			Existing Permit Issue Date: 05/13/2008
			Existing Permit Expiration Date: 02/28/2010
Consultant: Camp Dresser & McKee		Contact: W. Michael Brinckek	
Email: brinckekwm@cdm.com		Phone number: (919) 781-5730	
Review Engineer: Booker Pullen		Comments / Recommendations:	
Regional Engineer: Mitch Revels		Issue: 08846T05	
Review Engineer's Signature:		Permit Issue Date: XXX, XX, 2010	
Begin Date: August 3, 2010		Permit Expiration Date: XXX, XX, 2015	

I. Cumberland County Ann Street Landfill, owns and operates a municipal solid waste (MSW) landfill located in Cumberland County. Permit application 2600161.09A was received by the Division of Air Quality, Raleigh Central Office on May 28, 2009 and considered complete on that date. This application was received nine months prior to the expiration date of the permit and will receive the application shield for the facility pursuant to 15A NCAC 2Q.0513. This application will go through a 30-day public notice and the 45-day EPA review.

I. Description:

The Cumberland County Ann Street Landfill collects municipal solid waste from Cumberland County. The anaerobic decomposition of the buried municipal solid waste produces landfill gas (LFG). In the primary operating scenario, the gas collection and control system collects the landfill gas via a network of extraction wells, perforated and solid piping within the limits of the landfill. The gas is then routed to three landfill gas-fired boilers located at a local off-site facility named Cargill, Incorporated to be used as fuel. The boilers are listed in the Air Quality Permit (No. 03903) that is held by Cargill, Incorporated. The flare (ID No. CD-1) and gas collection and control system (ID No. GCCS1) are physically located on the landfill. The flare is used to burn off excess gas when the boilers are operating or to burn the landfill gas when the boilers are offline.

III. Purpose of application: The purpose of application No. 2600161.09A is to:

- A. Renew Title V Air permit 08846 in accordance with 15A NCAC 2Q .0513.
- B. Remove the Special Order by Consent (No. 2007-007) because Cumberland County has fulfilled the requirements. A response letter dated June 21, 2010 was sent to Robert N. Stanger, P.E. (County Engineer) stating that the landfill has met the requirements of SOC No. 2007-007.
- C. Remove the following site-specific requirements because they have been completed.
 - 1. The horizontal collection system in the Tier 1 phase of this project shall be installed on 100-foot centers, with alternate collectors using an 80-foot wide scrim-reinforced tarp above the collector, running along the length of the collector, in Cells 1-8, in which the initial waste has been in-place for five years and more.
 - 2. The horizontal collectors installed during the Tier 1 phase of this project, shall be placed a minimum of 5 feet below the surface of the existing waste in Cells 1-8.
- D. Remove the initial performance test requirements. The performance test was completed on July 21, 2008.

IV. Statement of Compliance:

On the latest inspection of this facility, September 15, 2009 by Mr. Mitch Revels of the Fayetteville Regional Office, the facility appeared to be in compliance with all applicable regulations.

V. Table of changes to existing permit No. 08846T04, per renewal application 2600161.09A:

Cover Letter of Permit			
Old Page No.	New Page No.	Condition No.	Changes
Page 1	Page 1	Cover letter	Changed date, revised permit number, changed directors name to Sheila C. Holman, added "renewal" to first paragraph, changed name of responsible official
Page 2	Page 2	Cover letter	Changed date on letter, changed responsible official, changed effective date of permit
Page 3	Page 3	Cover letter	Revised "table of changes to the permit" per this application
Body of Permit			
Page 1	Page 1	Cover page	Changed: Permit No., "Replaces Permit No.", effective date of permit, application No., permit issue date
Page 2	Page 2	Table of Contents	Removed "Part II" Section designation, removed Section 2.2 Special Order by Consent, added Attachment B
All pages	All pages	Top of pages	Changed permit revision number
Page 3	Page 3	Permitted Emissions Sources	Removed the "Part I" heading and the two subsequent paragraphs under the heading, revised the table to include the Treatment system as a control device
Page 3	Pages 3	Specific Limitations and Conditions	Revised the table for regulation 15A NCAC 2D .0524
Page 4	N/A	Specific Limitations and Conditions	Removed 15A NCAC 2D .0540 from the table of applicable regulations. This rule is listed in the General Conditions MM. Removed the initial performance test requirements.
N/A	Page 5	Specific Limitations and Conditions	Added description of the requirements of a "gas treatment system" per EPA definition
Page 11	N/A	Specific Limitations and Conditions	Removed two site-specific conditions (C) and (D) from Section 2.1 A. i. ii.
Page 16	N/A	Special Order by Consent	This section was removed because the requirements have been satisfied.
Pages 18-26	Pages 14-23	General Conditions	Added the most current version of the General Conditions

VI. Summary of Emission Sources and Control Devices

This table identifies all emission sources and associated control devices for which this Title V Operating Permit is being issued

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1 NSPS, MACT	Municipal solid waste landfill (closed portion)	CD-GCCS1	One landfill gas collection system,
ES-3 NSPS, MACT	Municipal solid waste landfill (active portion)	CD-1	One landfill gas-fired candlestick-type flare (1,250 scfm capacity),
		CD-Gas Treatment	One landfill gas treatment system that compresses the landfill gas, filters the landfill gas, and dewater (by refrigeration) the landfill gas prior to offsite sale

VII. Emission Source-by-Source Evaluation

A. Municipal solid waste landfill (ES-1 and ES-3) with one associated gas collection system (CD-GCCS1) including one candle stick-type flares (36 million Btu per hour heat input capacity, CD-1), and one landfill gas treatment system (CD-Gas Treatment).

1. 15A NCAC 2D .0521: Visible Emissions
2. 15A NCAC 2D .0516: Sulfur dioxide Emissions
3. 15A NCAC 2D .0524: New Source Performance Standards (Subpart WWW)
4. 15A NCAC 2D .1100: Control of Toxic Air Pollutants
5. 15A NCAC 2D .1111: Maximum Achievable Control Technology
6. 15A NCAC 2D .1806: Control and Prohibition of Odorous Emissions
7. 15A NCAC 2Q .0705: Existing Facility and SIC Calls
8. 15A NCAC 2Q .0711: Emission Rates Requiring a Permit

No regulatory review is required for the regulations listed above because there are no changes to these sources since the permit last went through public notice (in 2008). Compliance Assurance Monitoring (CAM) does not apply because these sources are regulated by both an NSPS and MACT that were promulgated after 1990 and control the pollutants that would be subject to the CAM.

B. Since the last significant permit modification, the regulatory language included in Title V permits was revised to place more of the NSPS requirements into the body of the permit. This new revised language will be placed into this permit along with the revised General Conditions.

VIII. A Professional Engineers Seal **is not** required for this renewal application because there are no new sources being added.

IX. A zoning consistency determination **is not** required for this renewal application. .

X. An application fee **is not** required for this renewal application.

XI. The appropriate number of copies of the application was received by the DAQ on May 28, 2009.

XII. PSD **does not apply** for this renewal.

XIII. Public Notice

A thirty-day public notice and EPA review period **is required**.

Public notice: The 30 day public notice period was from _____ through _____. ___ public comments were received for this permit application.

EPA 45-Day review Period: The DAQ sent copies of the appropriate information to the USEPA on June 16, 2009. The EPA 45-day review period was from _____ through _____. The USEPA did not have any comments on the renewal permit for this facility.

XIV. This facility **is not** subject to 15A NCAC 2Q .0508(g) "Prevention of Accidental Releases" because it does not store any of the listed 112(r) chemicals in quantities above the thresholds.

XV. Ozone Nonattainment:

Cumberland County is not currently designated as nonattainment for the eight-hour ozone standard. Nonattainment does not apply.

XVI. Air Toxics: An air toxic pollutant review is not required because no new sources were added with this renewal.

XVII. Recommendations:

This application renewal for the Cumberland County Ann Street Landfill, located at 698 Ann Street, Fayetteville, North Carolina, has been reviewed by the DAQ to determine compliance with all procedures and requirements. The Fayetteville Regional Office made comments on the draft permit. The DAQ has determined that this facility is complying or will achieve compliance as specified in the permit with all applicable requirements. The Fayetteville Regional Office concurs.

Issue permit No. 08846T05.