

**Gray Wolf Regional Landfill
Permit Number: 36155
Municipal Solid Waste Landfill
Responsiveness Summary**

Reply to comments made during the public notice.

- 1. The company requested clarification regarding applicability of Attachment “A”, Condition XII.B. The company would like to know if “within two days of the emission limitations exceedance” was applicable to when emission exceedances occur and not for a minor item such as a late report.**

This requirement is applicable for any emission exceedances and permit deviations including any reporting requirements in the permit.

- 2. There was a request to remove the word “Unchangeable” from Attachment “A”, Condition XIII.C.**

The Department acknowledges that no record is entirely unchangeable, including those that are made using indelible ink. ADEQ does recognize, however, that some programs used for the recording and storage of electronic data do not allow for the editing of the data itself, but instead allow for reports to be generated in editable formats. It is ADEQ’s intent that the Gray Wolf Landfill be required to use these kinds of programs for the storage and recording of monitored data. Therefore, this change has not been made.

- 3. The company asked if they have to submit a permit revision application if they decide to install the gas collection system earlier on during the permit term.**

Though the requirements for the gas collection system have been included in the permit, the company will need to file a permit revision to install the gas collection system earlier on during the permit term. This is needed as the permit will need to be revised to indicate which option the Permittee selects whenever a range of options are provided by the NSPS regulation.

- 4. There was a request to revise the requirements in Attachment "B", Conditions I.A, V.C.3, and VI.B.2.a. The source requested that this permit condition be revised to read “a person who is familiar with the EPA Reference Method 9 Observations” as ADEQ has stopped providing this required training and certification.**

EPA Reference Method 9 training is available through several different companies, as well as ADEQ. The Department has partnered with Arizona State University to offer EPA Reference Method 9 training. More information can be found on the ADEQ Web site at <http://www.azdeq.gov/envirom/air/compliance/smoke.html>.

5. **There was a request to revise the reporting period for the NSPS, Gas Collection and Control System information as stated in Attachment B, Permit Condition III.G.3. The company requested that this period coincide with the submission of the semi-annual reports specified in Section VII of Attachment “A”.**

Permit Condition III.G.3 of Attachment “B” does not specify exact reporting dates. The Permittee may coordinate the reporting requirement to coincide with the submission of the semi-annual reports specified in Section VII of Attachment “A”.

6. **There was a request to revise the reporting period for the periodic startup, shut down and malfunction (SSM) as stated in Attachment “B”, Condition III.H.4. The company requested an adjustment in reporting the above to coincide with the submission of semi-annual reports specified in Section VII of Attachment “A”.**

The requirement to submit the SSM report 30 days following the calendar half is an NSPS requirement and the Department does not have the authority to change this requirement. However, the Department has revised Section VII of Attachment “A” to correspond to the first and last halves of the calendar year.

7. **The source requested that biweekly survey of stationary rotating machinery should be removed as this requirement is nearly impossible to perform. The company states that stationary engines provide temporary emergency power for the site when standard power fails and that it is not a biweekly event, impossible to plan for and is typically for a short duration when it does occur. The company requested that this requirement should be removed as it has an opacity observation plan on file.**

The frequency has been changed from bi-weekly to monthly. The requirement to perform a monthly survey of visible emissions from the stationary engines needs to be performed only when the stationary rotating machinery are in operation. If the equipment is not in operation the observer should simply note that the equipment was not operating.