

Summary of Changes to the Draft CAAPP Permit

Advanced Disposal Services Valley View Landfill, Inc.  
I.D. No.: 115802AAL  
Permit No.: 99040004

Numerous typographic errors were corrected but are not listed below.

- Corrected typo throughout Permit:

Changed "Advance Disposal" to "Advanced Disposal"  
Changed "Attachment 3" to "Attachment 2"  
Changed "Attachment 4" to "Attachment 3"

- Section 3.3(a)(ii)(A)(III) was revised to incorporate the changes to Construction Permit 11060021, issued April 4, 2014.

**Revised:**

"Emissions shall be determined using appropriate emission factors which in order of preference shall be factors from on-site testing, manufacturer's emission data, and emission factors from USEPA's *Compilation of Air Pollutant Emission Factors* (AP-42), and continuous operation.

**Changed to:**

"Emissions shall be determined from data for actual flow of LFG, site-specific data for the composition of the LFG and, for pollutants other than SO<sub>2</sub>, appropriate emission factors, which in order of preference shall be equipment-specific factors from the manufacturer of a unit, representative factors for the type of unit and factors from USEPA's *Compilation of Air Pollutant Emission Factors* (AP-42). In particular, emissions shall not be determined using any emission factors listed in Condition 7.1.12 of Clean Air Act Permit Program (CAAPP) Permit 99040004, originally issued June 20, 2002, if use of those factor would act to understate actual emissions."

- Condition 4.1.2(a)(ii)(II) was deleted, since it is the duplicate of the first sentence of Condition 4.1.2(a)(ii)(I). Subsequent conditions were renumbered.
- Condition 4.1.2(a)(ii)(III) was revised to add a 3<sup>rd</sup> Tier of monitoring (quarterly). Condition now designated as Condition 4.1.2(a)(ii)(II) and reads as follows:

"Visible emission monitoring shall be conducted on a weekly basis until at least 4 consecutive weeks of data indicates compliance with both Condition 4.1.2(a)(i)(A) and (B). Thereafter; monitoring may revert to a monthly basis. If no visible emissions are detected after three consecutive months of monitoring, the monitoring frequency can be reduced to a quarterly basis. Monitoring shall revert to the weekly basis if a deviation is detected. Monthly monitoring may resume after another 4 consecutive weeks of data again indicates no deviations. Quarterly monitoring may resume after no visible emissions are detected after three consecutive months of additional monitoring."

- Condition 4.1.2(a)(ii)(V): Revised "48 hours" to "4 hours".
- Condition 4.1.2(b)(i)(B): Revised to incorporate the changes to the SO<sub>2</sub> limit from Construction Permit 11060021, issued April 4, 2014.

- Condition 4.1.2(c)(ii)(A): Revised to add "i.e., the sum of emissions data for the month of record plus the preceding 11 months of data" to the end of the condition.
- Condition 4.1.2(b)(ii)(B) was revised to delete the reference to LFG methane and NMOC testing since these parameters are not used in the emission calculations.
- Condition 4.1.2(c)(i)(A)(III)(2)(a)(iii) and (iv) was revised to add reference to the velocity and heat content testing provisions shown in Condition 4.1.2(c)(ii)(C)(III) and 40 CFR 60.754(e).
- Condition 4.1.2(c)(ii)(IV) was deleted since the provision is already covered in Condition 4.1.2(c)(ii)(D)(VI)(2) and 40 CFR 60.758(c)(4) and the subsequent conditions was renumbered.
- Condition 4.1.2(e)(ii)(A) revised to include the following last sentence:
 

"The monthly cover integrity survey conducted in accordance with Condition 4.1.2(c)(ii)(A)(IV)(5) and 40 CFR 60.755(c)(5) may be conducted and documented concurrently with the asbestos compliance demonstration."
- Condition 4.1.4(a)(ii)(A)(II) revised to incorporate the changes to Construction Permit 11060021, issued April 4, 2014.

**Revised:**

"Emissions shall be determined using appropriate emission factors which in order of preference shall be factors from on-site testing, manufacturer's emission data, and emission factors from USEPA's Compilation of Air Pollutant Emission Factors (AP-42), and continuous operation."

**Changed to:**

"Emissions shall be determined from data for actual flow of LFG, site-specific data for the composition of the LFG and, for pollutants other than SO<sub>2</sub>, appropriate emission factors, which in order of preference shall be equipment-specific factors from the manufacturer of a unit, representative factors for the type of unit and factors from USEPA's *Compilation of Air Pollutant Emission Factors* (AP-42). In particular, emissions shall not be determined using any emission factors listed in Condition 7.1.12 of Clean Air Act Permit Program (CAAPP) Permit 99040004, originally issued June 20, 2002, if use of those factor would act to understate actual emissions."

- Section 6.2: Added 150,000 gallon leachate storage tank to the listing of Insignificant Activities