



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 09 2015

Matt Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft prevention of significant deterioration (PSD) and part 70 renewal permit for Liberty Landfill, Inc., permit numbers 181-33869-00035 and 181-35359-00035, respectively. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) Page 38 and 40 of the best available control technology (BACT) analysis discuss the carbon monoxide (CO) and nitrogen oxide (NO_x) BACT determination for the landfill gas flare. In step 4 of the BACT analysis of this permit, flare BACT limitations established in a PSD permit for a similar source, Ridgewood Power, were not considered because the limits were not included in Ridgewood Power's operating permit. My staff confirmed with EPA Region 1 that Ridgewood Power is, in fact, required and able to comply with its BACT limits for both CO and NO_x established in Rhode Island PSD permit RI-PSD-8.

We request that you include the Ridgewood Power's demonstrated CO and NO_x BACT limits in the BACT analysis for Liberty Landfill. If you determine that similar limits are available and achievable for Liberty Landfill, we request that you reevaluate the NO_x and CO BACT for Liberty Landfill's flare and revise the BACT limits accordingly. Otherwise, we request that you justify why these limits are not available and achievable for Liberty Landfill.

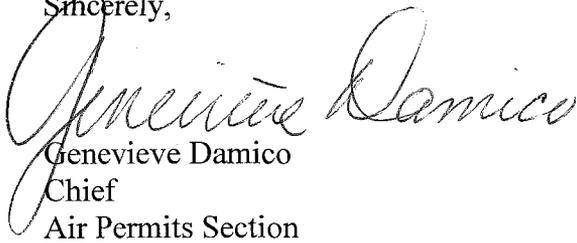
- 2.) Condition D.1.3(a) requires periodic testing for four different pollutants on the exhaust stack of one of the four landfill gas-fired generator sets EG9, EG10, EG11, or EG12. This condition requires testing to be repeated on an alternating basis every five years from the date of the most recent valid compliance demonstration and for testing to be

conducted to ensure the time between testing of a single engine is essentially the same for all four engines. We request that you clarify what is required by this testing condition including the following points:

- a. The condition, as written, is not clear regarding whether testing for all pollutants from one engine occurs at the same time or not.
- b. The condition, as written, is not clear about the order in which the tests must be performed. For example, if EG9 is tested, can the source test EG9 again before either EG10, EG11, or EG12 are tested once?
- c. The condition requires that the interval between testing of a single engine is required to be "essentially the same for all four engines." This term is vague and confusing and is not clear how the "essentially the same" frequency relates to the periodic testing required to occur at least one every five years.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,


Genevieve Damico
Chief
Air Permits Section