

Permit No. V-2625  
September 13, 2011

**IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT**

150 S. 9<sup>th</sup> St.  
El Centro, CA 92243  
(760) 482-4606

**MAJOR FACILITY PERMIT REVIEW**

Company Name:	Imperial Landfill, Inc.
Facility Name:	Imperial Landfill
SIC Code:	4953 (Class III Solid Waste)
Applied For:	New Title V Permit
Source Type:	Municipal Solid Waste Disposal
Mailing Address:	3354 Dogwood Rd. Imperial, CA 92251
Facility Location:	104 E. Robinson Rd. Imperial, CA 92251
Responsible Official:	Steve Meyer, Office: (623) 241-8420
Plant Site Contact:	Richard Bringle, Jr. Office: (760) 353-1100 Cell: (760) 427-3776
Permit Reviewer:	Thomas Brinkerhoff, APC Engineer

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## **I. Introduction**

Pursuant to Rule 900, of the Imperial County Air Pollution Control District (Air District) Rules and Regulations, the Air District intends to issue a Title V Operating Permit to the Imperial Landfill, Inc. (Imperial Landfill) for the waste disposal operation which is located at 104 E. Robinson Rd. in Imperial, CA. Imperial Landfill operates an active landfill gas recovery and control system consisting of landfill gas recovery wells, distribution lines, and a flare station for the destruction of landfill gases produced from the covered section of the landfill. The facility will operate under Title V Operating Permit Number V-2625. The Operating Permit includes conditions to ensure that all Federal, State and District requirements are satisfied.

The Imperial Landfill exceeded a design capacity of 2.5 million cubic meters or 2.5 million mega grams upon receiving a 42-acre expansion of the landfill site in 1997. The permittee at that time became subject to Title V Regulations in accordance with the New Source Performance Standards (NSPS) for Municipal Solid Waste (MSW) Landfills, promulgated under 40 Code of Federal Regulations (CFR) Part 60, Subparts cc and WWW, and codified under Air District Rule 1101. Also to be noted, Imperial Landfill is not a major facility either for hazardous air pollutants (HAP) or for regulated pollutants. Emissions of HAP are well below the 10 tons per year individual HAP and/or 25 tons per year of any combination of HAPs, as Total HAPs at the facility are less than 1 ton per year. The highest emitting regulated pollutant at the site, carbon monoxide (CO), has the potential to emit an estimated 18.3 tons per year, which is significantly below the 100 tons per year major facility potential to emit threshold.

Major Facilities which must obtain Title V permits must meet the requirements of 40 CFR Part 70, as it is set forth in Air District Rule 900, *Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal Clean Air Act Amendments of 1990*. The permits must contain all applicable requirements defined in Rule 900, including all monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

## **II. Facility Description**

Imperial Landfill operates a 42 acre active expanded landfill and a 31 acre inactive (closed) MSW landfill. House-hold and green waste are primarily disposed at the sites, along with smaller commercial nonhazardous waste streams. Hazardous waste of any form is not accepted at the facility. Landfill No. 1 is closed and capped, containing an

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estimated 1,000,000 tons of waste. The landfill opened up to accept waste in 1972, and was continuously active receiving waste until it was closed and capped in 2003. Landfill No.1 is a pre-Subtitle D Resource Conservation and Recovery Act (RCRA) landfill and has no bottom liner.

In 2004, a gas collection and control system comprising of 20 vertical wells and an enclosed combustor was installed to control landfill gas from the closed Landfill No.1. The gas control system is sized to also control gas from the expanded active landfill, as well as gas produced from future landfills that could be constructed on adjacent land of the present day site. The gas control system commenced operation in early 2005. The gas control system was installed at Landfill No. 1 because of the possibility that gas may intrude into the water table, as the site has no bottom liner. The installed flare will control landfill gas (LFG), predominantly methane and NMOC, but as a result of the flare combustion new emissions will be created from flare combustion. Additionally, trace gases are being destroyed, which could present adverse acute and chronic exposure to workers and nearby residents.

The expanded active landfill at the site, Landfill No. 2, has a design capacity of approximately 2.56 million tons of MSW. Landfill No. 2 was constructed in full accordance with federal regulatory RCRA Subtitle D. Imperial Landfill under their current CUP is allowed to increase disposal rates, which they have done substantially as the landfill has gone from a limit of 666 tons per day (TPD) to a limit of 1135 TPD. This has taken place mainly due to the increase of demolition wastes, as well as some maquiladora wastes from Mexicali, Mexico which must be returned to the United States as required by law. It is anticipated the landfill will reach design capacity sometime in either 2011 or 2012. Imperial Landfill over the past year has been working with consultants and various regulatory agencies in seeking a new expansion for the landfill, from the current 3.8 million ton capacity to a capacity greater than 5 million tons.

The Landfill Gas Flare Abatement System has a John Zink Company Flare Unit, with a 16.4 MMBtu/hr capacity. The unit has an exhaust stack that is 5 ft. in diameter and 40 feet tall, with 5 burners. The flare has a 600 SCFM blower fan, including a Condensate Organic Vapor Granulated Carbon Control Unit. The system includes gas flow, pressure, and temperature gauges and recorders to ensure that the system is working effectively and data can be properly recorded.

Several other sources of emissions exist at the landfill, as Allied operates two pieces of combustion equipment that aid in processing waste at the site. The first is a Wildcat Model 516 Trommel Screen, which handles brush chipping and screening duties for the green waste transported to the landfill. The screening plant is entirely self contained and includes an attached screened product conveyor and over-stacking conveyor which folds

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down hydraulically. The screen is powered by a John Deere Model 4024HF295 diesel engine, which has a rating of 66hp at 2,800 rpm. The EPA/CARB engine family name for the John Deere unit is 8JDXL03.0203, with the engine being certified as a Tier 4 Interim engine under CARB Executive Order U-R-004-0332 for New Off-Road Compression-Ignition Engines. The unit is currently permitted under Air District Permit No. 3888A.

The second combustion unit which is utilized onsite is a Wacker Model PT 6LS trash pump, which is driven by a Lombardini Model 11LD 625-3 diesel engine. The Lombardini engine has a rating of 32.5 hp at 2,500 rpm. The EPA/CARB engine family name for the Lombardini unit is 7LBDL1.8711L, with the engine being certified as a Tier 2 engine under CARB Executive Order U-R-027-0077 for New Off-Road Compression-Ignition Engines. This combustion unit is also currently permitted under Air District Permit No. 3888A.

### III. Current Emission Status

The total annual emissions, including hazardous air pollutants (HAPs) and non-methane organic compounds (NMOCs), of the facility are included in the table below. The table displays the emissions produced from the various combustion sources at the facility, as well as the landfill gas surface emission sources of Imperial Landfill:

Potential Yearly Emissions (tons/yr)

Equipment	PM10	VOC	Sox	Nox	CO	HAP	NMOC
Trommel Screen	0.84						
JD 66 HP (Trommel)	0.0182	0.0299	0.1823	0.4171	0.0856		
Trash Pump	0.0128	0.0127		0.2211	0.0800		
Flare	1.23	0.19	1.13	2.89	18.11		
Landfill Gas Surface Emissions		8.11				0.88	20.80
Total	2.10	8.34	1.31	3.53	18.28	0.88	20.80

Landfills generate gas from anaerobic and aerobic decomposition of organic waste. The landfill gas at Allied, under anaerobic decomposition, is composed of approximately 50% methane (CH<sub>4</sub>) and 50% carbon dioxide (CO<sub>2</sub>). The gas will also contain small amount of non-methane organic compounds, hazardous air pollutants (HAP), and inorganic compounds. Particulate emissions due to traffic from waste haulers, waste dumping, waste cell movement, application of soil cover, waste and soil compaction and wind erosion make up a significant amount of PM10 pollution.

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#### IV. Applicable Requirements

In Accordance with information submitted in the Title V application and the Air District review, the following are the District requirements that apply to Imperial Landfill.

Applicable Requirement	Equipment Affected	Adoption Date
Rule 101, Definitions	Facility Wide	10/10/06
Rule 201, Permits Required	Facility Wide	09/14/99
Rule 207, Standards for Permit to Construct	#1 31 Acre Landfill #2 42 Acre Landfill Flare Station, Trommel Screen, Trash Pump	11/19/85
Rule 208, Standards for Permit to Operate	#1 31 Acre Landfill #2 42 Acre Landfill Flare Station, Trommel Screen, Trash Pump	09/14/99
Rule 400, Fuel Burning Equipment – Oxides of Nitrogen	Flare Station, Trommel Screen, Trash Pump	09/14/99
Rule 401, Opacity of Emissions	Facility Wide	11/19/85
Rule 403, Quantity of Emissions	Flare Station, Trommel Screen, Trash Pump	05/18/04
Rule 405, Sulfur Compounds Emission Standards, Limitations, and Prohibitions	Trommel Screen, Trash Pump	05/18/04
Permit to Operate No. 2625B-2	#1 31 Acre Landfill #2 42 Acre Landfill Flare Station	N/A
Permit to Operate No. 3888A	Trommel Screen, Trash Pump	N/A
Rule 900-Operating Permits	Facility Wide	12/14/93

The following are NSPS requirements that apply to Imperial Landfill and are incorporated into this Title V Permit.

40 C.F.R. 60, NSPS, Subpart WWW		
40 C.F.R. 60.752(b)	IV.A, pg. 9	collection of landfill gas
40 C.F.R. 60.753(b)	IV.B, pg. 9-12	operate collection system with negative pressure

<b>40 C.F.R. 60.753(c)</b>	IV.B.3, pg. 10-11	temperature, nitrogen and oxygen levels
<b>40 C.F.R. 60.753(c)(1)</b>	IV.B.4, pg. 11	nitrogen test method
<b>40 C.F.R. 60.753(c)(2)</b>	IV.B.5, pg. 11	oxygen test method
<b>40 C.F.R. 60.753(f)</b>	IV.C.3, pg. 12	operational standards for collection and control systems
<b>40 C.F.R. 60.755(c)</b>	VI.B., pg. 18-20	determination of compliance with surface methane operational standard
<b>40 C.F.R. 60.755(c)</b>	VI.B.5, pg. 20	cover integrity monitoring
<b>40 C.F.R. 60.755(e)</b>	VI.D.1., pg. 20-21	times when WWW provisions apply
<b>40 C.F.R. 60.756(a)</b>	VII.A.1, pg. 21	active gas collection system monitoring
<b>Requirement</b>	<b>Condition and Page in Permit</b>	<b>Description/Notes</b>
<b>40 C.F.R. 60.758(a)</b>	X.A.1, pg. 26-27	recordkeeping
<b>40 C.F.R. 60.758(b)(1)</b>	X.C.1, pg. 27	recordkeeping
<b>40 C.F.R. 60.758(b)(2)</b>	X.C.2, pg. 27-28	recordkeeping
<b>40 C.F.R. 60.758(b)(4)</b>	X.C.3, pg. 28	recordkeeping

## V. Statements of Basis

The proposed Operating Permit includes conditions to ensure that all Federal requirements will be fully satisfied. Additionally, the permit has been designed to have adequate monitoring, recordkeeping and reporting requirements to demonstrate continuous compliance with the permit conditions.

The following provides additional clarification on the various sections of the permit, as well as certain requirements listed within the permit conditions.

### A. Equipment/Source List

This section of the permit lists all permitted sources, with each one considered to be a significant source. Permitted sources are those that require an Air District operating permit pursuant to Air District Rule 201. Each source has the potential to emit more than two pounds per day (uncontrolled) of any affected pollutant, and several also have the potential to emit toxic air contaminants (TACs). All abatement (control) devices that control permitted sources are listed as well in this section. An abatement device may

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also be a source of secondary emissions. If the primary function of a device is to control emissions, it is considered an abatement device.

## B. General Conditions

The first section of the permit contains administrative requirements and conditions which apply to all facilities. This permit does not include Title IV or accidental release provisions. The general conditions derive from the standard requirements in Air District Rule 900 and 40 CFR Part 60 WWW.

1. Original Authority to Construct (ATC) and Permit to Operate (PTO) No. 2625 was issued to Imperial Landfill in 1997 for a landfill expansion of 2.8 million tons of MSW. Among the permit conditions of PTO No. 2625, a landfill gas control system was required if NMOC emissions were calculated to be greater than 17 megagrams per year, using 40 CFR Part 60 WWW, Tier 2 methodology. The permit was later acquired by the Allied Waste Company in 2000. In 2002, Allied applied for an amendment to Permit No. 2625, as the landfill planned to install and operate an active landfill gas control system, with an enclosed flare. In 2003, a green waste shredder was later added to the landfill requiring a permit revision to ATC No. 2625B. Finally in 2010, PTO No. 2625B-2 was amended in order to reflect the removal of two combustion units, a trommel screen and a water pump. The permit is presently held by Allied Imperial Landfill.
2. 40 CFR Part 60, WWW, requires landfills constructed after 1991 with design capacity greater than 2.5 million mega-grams, and that emit or will emit greater than 50 megagrams of NMOC, to install a landfill gas recovery and control system. Imperial Landfill is therefore subject to this requirement, as the landfill design capacity is greater than 2.5 million megagrams and the calculated maximum emissions rate is 100 megagrams per year when the landfill reaches capacity in 2011-2012. Air District Permit 2625B-2, required that Imperial Landfill install and maintain a landfill gas recovery system once the total NMOC of the site was equal to or above 17 megagrams per year. The landfill gas recovery and control system, which was installed in 2004, is governed by Section VI of the proposed Operating Title V Permit.

## C. Landfill Controls and Emissions Standards

1. 40 CFR Part 60 WWW, Standard of Performance for Landfills

All applicable landfills are required to install a gas recovery and control system that complies with 40 CFR §60.752(b)(2)(ii). In Imperial Landfill's case, as previously

mentioned, §60.752(b)(2)(ii) is superseded by Condition VII.3 of local Air District Permit No. 2625B-2. This condition sets a requirement that is more stringent than §60.752(b)(2)(ii), as the permittee must install the system once total NMOC emissions were equal to or greater than 17 megagrams per year. The permittee is therefore required to submit a collection and control system design plan, prepared by a Professional Engineer, within one year of determining the NMOC emissions rate is equal to or greater than 17 megagrams per year. Recovery and control systems, whether active or passive, must be designed to handle the maximum landfill gas flow expected to be generated from the entire landfill area. Control systems shall reduce NMOC by 98 weight-percent or reduce the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen.

There are operating requirements the gas recovery and control system must comply with, such as placement, well density, and the number of wells placed in the landfill, per 40 CFR § 60.759(a). Components of the recovery system must be constructed of polyvinyl chloride (PVC), high density polyethylene(HDPE) pipe, fiberglass, or stainless materials as stated under 40 CFR § 60.759(b)(1). This stringent requirement is necessary in order to eliminate any corrosion of the gas recovery system since the system will be used in a given landfill for a long period of time. The above requirements are Permit Conditions in Section IV of Imperial Landfill's proposed Operating Permit.

## 2. Emission Standards

Section III of the proposed Operating Permit contains conditions which set forth emissions standards that lead to the permittee being in compliance with the aforementioned control requirements for NMOC. Additionally, per BACT requirements of Air District Rule 207, emission limits are established in Air District Permit No. 2625B-2 for an active flare (enclosed combustor). The flare shall not exceed 0.065 lbs/MMbtu for NO<sub>x</sub> and 0.20 lbs/MMbtu for CO, along with the NMOC destruction efficiency of 98% or greater, which is listed as conditions in Section XI of ATC No. 2625B-2. The landfill gas control system must also comply with Air District's Prohibitory rules: a stack opacity no greater than 20 percent for no more than 3 minute in any 1 hour, a stack sulfur compound concentration of less than 0.2% by volume (2,000 ppmv), and a grain loading of less than .2 gr/scf. Small concentrations (33ppm) of hydrogen sulfide and mercaptan can be in the landfill gas, and when oxidized to SO<sub>2</sub>, will be substantially less than the 0.2% volume limit. The grain loading will be substantially less than 0.2 grains/scf (solid particles). A typical flow rate for an enclosed combustor, using the turndown design, is in the 2500 to 3000 scfm range. Concentrations are expected to be in

the 0.005 gr/scf.

Applicable landfills must meet certain requirements and standards for fugitive surface landfill gas. Surface landfill gas (3 inches above the surface) must be maintained at less than 500 ppm methane above background and is accomplished by maintaining a well design gas recovery and control system. This item is addressed in the proposed Operating Permit, Section IV.B.6 per the requirement in 40 CFR § 60.753(d).

The two stationary equipment units driven by compression-ignition (CI) diesel engines are required to comply with stack opacity standards of Ringlemann 1 or less, per Air District Rule 401 – Opacity of Emissions. The first unit is a Wildcat Model 516 trommel screen, driven by a 66 hp diesel engine, and the second unit is a Wacker trash pump, driven by a 32.5 hp diesel engine. Both units will be mandated to adhere to the emissions and operative requirements of the Airborne Toxic Control Measure for Stationary CI Engines (ATCM), which was last amended in October 2007 by ARB. The goal of ARB through this regulation is to reduce the amount of diesel particulate matter, an identified toxic air contaminant, contained in the atmosphere. The ATCM affects all operations utilizing stationary diesel engines, including prime and emergency standby engines. The ATCM is codified in Section 93115, Title 17, of the California Code of Regulations.

#### D. Operational Standards

The proposed Operating Permit contains operating parameters, in Section III.A, for the landfill gas control system to ensure the minimum destruction level of 98% for NMOC landfill gas. The temperature control system contains thermocouples that will shut the system down if combustion temperatures cannot be maintained between 1400 and 1800 degrees Fahrenheit. The system light alarm will come on to alert operators while simultaneously notifying the maintenance contractor by telephone. Monitoring requirements, with the varying methods and procedures, are listed under Section VIII of the proposed Operating Permit. The landfill wells must operate under a negative pressure at all times unless there is a landfill fire or each interior wellhead in the collection system operates with a landfill gas temperature less than 55 degrees Celsius and with either a nitrogen level less than 20% or an oxygen level less than 5%. Higher operating levels may be established by the permittee, however supporting data must demonstrate that the elevated parameter does not cause fires or significant disruption of the anaerobic decomposition by killing methanogens [40CFR § 60.753(c)].

#### E. Fugitive Dust Control

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In Imperial Landfill's Air District Permit, PTO No. 2625B-2, conditions are included in Section X to ensure that fugitive dust is sufficiently controlled on the premises. Fugitive dust must be controlled on all active roadways through the application of wet suppression techniques, such as water. Imperial Landfill operates a dedicated water truck to meet the minimum surface moisture content level of 4%. The proposed Operating Permit contains conditions in Section VIII mandating that the permittee shall conduct EPA 22 visual emissions (VE) observations on a daily basis for all dust producing sources. Additional conditions have been inserted to monitor fugitive dust, such as the permittee having a CARB certified visible emissions reader determine compliance with opacity standards.

#### F. Periodic Monitoring

Compliance with the Landfill Gas Flare Station emissions limits will be demonstrated through annual source testing. Source test results carried out in 2004 confirmed compliance with the NO<sub>x</sub>, CO, and NMOC limits in the proposed Operating Permit, Section III.A.1 and PTO No. 2625B-2.

Section VII.A of the proposed Operating Permit contains monitoring provisions that require the permittee on a monthly basis to measure gauge pressure in the gas collection header at each well, as well as the temperature and nitrogen or oxygen for each well to determine if excess air infiltration into the landfill is occurring. It is critical to sustain levels in the landfill under an anaerobic state in order to maintain a steady generation of methane, and subsequent biodegradation, thereby reducing surface off-gassing of methane.

Section VII.B of the proposed Operating Permit contains conditions detailing specific procedures the permittee must implement in order to monitor surface methane fugitive emissions. The permittee shall monitor on a quarterly basis with an approved portable monitor which meet the requirements of Section VII.C of the proposed Operating Permit, thereby meeting the requirements of 40 CFR § 60.755(d). Emissions greater than 500 ppm above background shall be recorded as a monitored exceedance, with the permittee implementing cover maintenance or making adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance. The location in question shall then be re-monitored within 10 calendar days of detecting the exceedances.

#### G. Recordkeeping

Under the proposed Operating Permit Section IX, the permittee must maintain the

following records, updated and readily accessible, for at least 5 years:

1. The landfill design capacity
2. Year to year waste acceptance rate
3. Information of wells, well flow rates, NMOC gas concentration, flare station test reports.
4. Equipment operating parameters for all data sets in Section C.7 above.
5. A record of all exceedances for all limits under the operating permit.

These conditions will satisfy the requirements listed in 40 CFR §60.758(d) and 40 CFR §60.758(e).

#### H. Reporting Requirements

Under the proposed Operating Permit Section X., the permittee must report the following information:

1. Initial landfill(s) design capacity report containing a map or plot of the landfill, providing the size location of the landfill.
2. Submit every six months a written monitoring report to the APCD and U.S. EPA, identifying all deviations from permit requirements.
3. Submit quarterly landfill methane surface monitoring reports.
4. Annual flare station source test report.
5. An initial and annual NMOC emission report shall be calculated in accordance with the applicable Attachment A equations.
6. If the estimated emissions rates are consistently less than 50 Mg/yr, then the Permittee may elect to report estimated emissions rates every 5 years.
7. The permittee may submit a wastes closure report provided that no more waste dumping occurs at the landfill(s).

These conditions will satisfy the requirements listed in 40 CFR §60.757(b)(1)(ii), 40 CFR§60.757(b)(2), and 40 CFR §60.757(d).

#### I. Insignificant Sources/Activities

The permittee operates several emission units and carries out some activities which are not included in the Title V Permit due to the fact that the air emissions from these units and activities are considered insignificant. These emission units and activities are still required to comply with all federal requirements, as applicable. The Title V exclusion was granted following the guidance of the California Air Pollution Control Officers Association's (CAPCOA) Model List of Insignificant Activities for Title V Permit Programs,

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dated June 28, 2000. Since the emission units which are exempt are primarily mobile pieces of combustion equipment, the corresponding Performance Conditions from Permit 2625B-2 are not included in the proposed Title V Operating Permit. The emission units exempt, and the basis for their exemption, are listed in the Insignificant Activities Section, Section VI, which follows.

## **VI. Insignificant Activities**

The following types of activities and emission units will not be included in the Title V Permit:

1. Two diesel compactors, one dozer, one scraper, one motor blade, and one front loader will not be included. Various pickup trucks, diesel trucks (off-highway), water trucks, and dump trucks (off-highway) will also be excluded. Motor vehicles, as defined by the Vehicle Code of the State of California, will be exempt based on Rule 202.E.2.a and the guidelines of the Title V Operating Permit Program Submittal, Attachment C – List of Trivial Activities.

## **VII. Supplemental Annual Fee**

The supplemental annual fee for the facilities will be determined according to the guidelines of Rule 900.G. The supplemental annual fee will be calculated according to the following equation:

$$s = [\$44.48 \text{ per ton (CPI adjusted)} \times e] - f$$

Where:

s = supplemental annual fee in dollars

e = fee-based emissions in tons per year

The landfill emissions are based on AP-42 emission factors, the U.S. EPA LANDGEM modeling system which were calculated by the applicant, for which fee-based emission schedule applies:

NMOC	=	80.00
Fugitive Dust	=	30.00
Hazardous Air Pollutants	=	1.79
<b>Total</b>	<b>=</b>	<b>111.79</b>

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f = sum (in dollars) of annual fees under Regulation III:

Source	Permit #	Fee Paid
Trommel Screen	3888A	\$396.00
Tub Grinder	3888A	\$237.00
Landfills (Based on Power/BTU )	2625B-2	\$5,556.50
<b>TOTAL</b>		<b>\$ 6,189.50</b>

Total Emissions of Fee Pollutants	111.79 tons/yr
Emissions of Fee Pollutants x \$44.48/ton	\$4,972.50
Annual Fees under Reg. III	\$6,189.50
Estimated supplemental Title V Program Fee	\$4,972.50 – \$6,189.50 = - \$1,217 (\$0.00)

These calculations demonstrate that the annual fee paid by the facilities under Regulation III exceeds the emission fee pollutant schedule under Rule 900. Therefore, no supplemental fee will be required from Imperial Landfill.