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**Technical Support Document
Casa Grande Solid Waste Municipal Landfill**

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**Technical Support Document
Proposed Title V Permit
Casa Grande Solid Waste Municipal Landfill, Permit #V20642.000**

1. BACKGROUND

A. Applicant

City of Casa Grande
Public Works Department
3181 North Lear Avenue
Casa Grande, AZ 85122

B. Project Location

This application was submitted by City of Casa Grande to permit their existing solid waste municipal landfill located at 5200 ChuiChu Road, Casa Grande, Arizona. The site is located in Section 7, Township 7 South, Range 6 East and in unincorporated Pinal County, approximately three miles south of the City of Casa Grande.

C. Attainment Classification

The landfill is located in an area designated attainment for all pollutants.

D. Permitting History

The facility is owned and operated by City of Casa Grande, a Government Entity. The landfill began operations in 1949 and is currently operating.

2. AGENCY AUTHORITY

The Arizona Legislature granted the Pinal County Board of Supervisors to establish a program to permit certain sources of regulated air pollutants. Generally, see ARS §§49-470 *et seq.* (ARS Title 49, Chapter 3, Article 3.)

The Pinal County Board of Supervisors adopted a Code of Regulations, which among other things establishes such a program for permitting stationary sources. Generally, see the Pinal County Air Quality District Code of Regulations, as amended January 12, 2009.

In accord with A.R.S. §49-480, Pinal County's permit program constitutes a "unitary" program, with a permit conferring both authority to construct and authority to operate.

Under authority of CAA §110, the EPA has approved relevant portions of the Pinal County

permitting program as an element of the Arizona SIP. In particular, see 61 Fed. Reg. 15717 (4/9/96). Among other things, that SIP-approval approved Pinal County minor new source review program. A separate EPA SIP-approval allows Pinal County to define federally enforceable permit limitations. See 60 Fed. Reg. 21440 (5/2/95).

Under authority of CAA §§501 *et seq.*, the EPA has conferred interim and final approval upon Pinal County's Title V permitting program. See 61 Fed. Reg. 55910 (10/30/96), 66 Fed. Reg. 48402 (9/20/01).

3. PROCESS DESCRIPTION

A. General Process

The Casa Grande Landfill is operated solely as municipal solid waste landfill serving the City of Casa Grande, Arizona City and areas of unincorporated Pinal County within the Municipal Planning Area of the City of Casa Grande. No hazardous or infectious medical wastes are accepted for disposal. Incineration of wastes is not performed. No products will be generated at the site or the support operations.

The landfill site is 160 acres and is divided into two active cells; a western cell of 54.5 acres and an eastern cell of 51.5 acres. Area north of the western cell is reserved for retention and area north of the eastern cell may be used for disposal in the future.

B. Waste for Disposal

1. Approved Waste

The landfill operates under a Solid Waste Facility Plan (SWFP) approved by ADEQ in 2003. This plan allows to accept the following materials for disposal:

- o Municipal solid waste (household and commercial trash);
- o Construction debris (from demolition and construction activities);
- o Dead animals;
- o Containers (clean and perforated);
- o Industrial non-hazardous waste;
- o Limited medical waste;

- o Wastewater sludge from city treatment facility (if it passes paint filter test);
 - o Green waste (if mixed with residential municipal waste loads);
 - o ¹Nonfriable asbestos;
2. Dis-approved Waste
- o ²Friable asbestos;
 - o Hazardous waste (ARS 49-921) except for CESQG amounts;
 - o Biohazardous medical waste (AACR18-13-1401);
 - o Liquid waste (40 CFR 258.28);
 - o Special waste (ARS 49-852);
 - o Tires;
 - o Automobiles;
 - o Petroleum contaminated soils;
 - o ³Liquid waste (including septage waste)
3. Recycled Materials
- o Green waste;
 - o ⁴Large appliances;

¹Nonfriable asbestos is disposed off after thorough wetting, compaction and covering to limit emissions.

²The loads are inspected by trained gate house attendants and equipment operators for friable asbestos.

³The landfill does not accept water treatment sludge or septic waste except wastewater treatment sludge from the city's treatment plant after testing.

⁴Prior to removal and recycle, any refrigeration gas is removed from the appliance by a certified technician.

- o Lead acid batteries;
- o Paints;
- o Glass;
- o Plastics;
- o Mattresses;
- o Scrap metal;
- o Newspapers;
- o Cardboard;

The landfill is primarily operated in accordance with the operational requirements in the SWFP which include;

- o Use of tarps for alternate daily cover;
- o Daily covering of solid waste with six inches of earthen material;
- o Limits for methane gas concentrations;
 - 25% of the Lower Explosive Limit (LEL) in on-site structures and
 - 100% of the LEL at the property boundary

4. CALCULATION OF THE AMOUNT OF WASTE GENERATED OVER THE YEARS

The landfill, with regard to refuse acceptance, has three periods of significance.

A. Period from 1949 to 1968

For this time period, the landfill was documented to have been an uncontrolled dump site where trash was dumped into trenches and burned. In accordance with NSPS subpart WWW definitions (§60.751), non-degradable waste means waste that does not decompose such as municipal waste or combustion ash. The LandGEM model instructions used to calculate emissions from the landfill allow to subtract the portion of the non-biodegradable waste from the total waste acceptance rates. Since the waste received during this time period was burnt, therefore the waste acceptance from this time period is not added to the total waste acceptance rate for calculating

emissions.

B. Period from 1968 to 1998

No annual refuse records for this time period are available and the annual mass weights were based on the published population data and waste generation rates. EPA published formula in 40 CFR Part 98, Mandatory Green House Gas Emissions was used. This formula from §98.343 was used for the years when disposal quantities were not readily available. Following formula was used to calculate the waste acceptance rates:

$$W_x = (\text{POP}_x * \text{WGR}_x * \% \text{SWDS}_x) / 100\%$$

Where W_x = Quantity of waste placed in landfill in year x in metric tons

POP_x = Population served by the landfill in year x from city population

WGR_x = Average per capita waste generation rate for year x in metric tons

$\% \text{SWDS}_x$ = Percent of waste generated and subsequently disposed in landfills

C. Period from 1998 to 2009

Scale data was available from 1998 to 2009 and for the period from 2003 to 2009, scale data along with waste characterization was available. Although scale data was available for the period from 1998 to 2009, this scale data contained a large percentage of waste which was inert material from demolition and construction activities and can be excluded from the total refuse acceptance data. This percentage was determined to be roughly 54% and was calculated from the scale data and waste characterization data available from 2003 to 2009.

D. Total Waste Accepted Throughout the Time Period

The total landfill refuse accepted throughout from 1949 - 2009 using available scale data, waste characterization and Part 98 formula was calculated to be 1.47 million megagrams.

5. EMISSION CALCULATIONS

A. Calculating Landfill Gas Emissions

Methane (CH_4) and CO_2 are the primary constituents of landfill gas, and are produced by microorganisms within the landfill under anaerobic conditions. The

annual tons degradable mass values were entered into the LandGEM model. This model calculates the annual emissions of Total Landfill Gas, Methane and NMOC.

B. Calculating Methane Emissions

Uncontrolled methane (CH₄) emissions were estimated by using a theoretical first-order kinetic model of methane production developed by the EPA. This model is known as the Landfill Gas Emissions Model and is represented by the following equation

$$Q_{CH_4} = \sum_{i=1}^n \sum_{j=0.1}^1 kL_o [M_i/10] e^{(-kt_{ij})}$$

Where Q_{CH_4} = Annual methane generation in the year of the calculation (m³/yr)

i = 1-year time increment

n = (Year of calculation) - (Initial year of waste acceptance)

j = 0.1-year time increment

⁵ k = Methane generation rate (year⁻¹)

⁶ L_o = Potential methane generation capacity (m³/Mg)

M_i = Mass of waste accepted in the i^{th} year (Mg)

t_{ij} = Age of the j_{th} section of waste mass M_i accepted in the i^{th} year

C. Non-methane Organic Compounds (NMOCs)

Typically, landfill gas emission (LFG) contains a small amount of non-methane organic compounds (NMOC). This NMOC fraction often contains various VOCs, HAPs and greenhouse gases (GHG). This NMOC⁷ rate was estimated using equation (3) listed in AP42, 5th ed., Section 2.4, Municipal Solid Waste Landfills, dated

⁵Default methane generation rate of 0.020 was used.

⁶Default potential methane generation capacity 170 was used.

⁷The current version of the Landfill Air Emissions Estimation model contains a proposed regulatory default value for total NMOC concentration of 4,000 ppmv.

11/98.

$$Q_p = 1.82 * Q_{CH_4} * (C_p/1 \times 10^6)$$

Where Q_p = Emission rate of pollutant P (i.e. NMOC), m^3/yr

Q_{CH_4} = CH_4 generation rate (from the Landfill Air Emissions Estimation model), m^3/yr

C_p = Concentration of P in landfill gas, ppmv

1.82 = Multiplication factor

D. Calculating VOCs

The NMOC is also used to express the annual estimated emission of VOC. To determine estimates of VOC emissions for inventory purposes, the emission of VOC is determined as a percentage of NMOC. The percentage of VOC in NMOC is 39% as published within AP-42 (Table 2.4-2).

E. Calculating HAPs

The percentage of fugitive HAPs was determined from the summation of default concentrations for HAPs in landfill gas as listed in AP-42, Table 2.4-1. These concentrations of HAPs in landfill gas from AP-42 and the total volume of landfill gas determined by LandGEM model were multiplied and converted to annual tons per listed HAP. The annual amounts for each HAP were then summed for an annual total of tons of combination of HAPs.

F. Calculating Haul Roads and Stockpiles Fugitive Emissions

1. PM_{10} Emissions

For vehicle miles traveled on unpaved roads, Maricopa County Air Quality Department's uncontrolled emission factors developed from AP-42 were used. For landfill activities, equation AP-42, 13.2.4 was used. These emission factors are as follows:

3.2 lbs/VMT for heavy duty vehicles at 15 MPH

0.44 lbs/VMT for light duty vehicles at 15 MPH

630 lbs/acre-yr for stockpiles

⁸0.000121 lbs/ ton waste for landfill activities

2. PM_{2.5} Emissions

Emission factors for PM_{2.5} emissions were developed from AP-42 Municipal Solid Waste Landfills, using equation 13.2.2-1 for the silt content, equation 13.2.2-2 for the k factor, equation 13.2.2-4.1a for the unpaved roads and equation 13.2.4-4 for the aggregate handling and storage piles. The emission factors for the Total Suspended Particles (TSP) are corrected to derive PM_{2.5} emissions. These emission factors are as follows:

0.00451 lbs/VMT for heavy duty vehicles at 15 MPH

0.00168 lbs/VMT for light duty vehicles at 15 MPH

144 lbs/acre-yr for stockpiles

3.867E-06 lbs/ton waste for landfill activities

It was estimated that an average of 124 on-site and off-site heavy and light duty vehicles will travel 25.5 miles per day on the site under maximum waste transport conditions. Additional emissions from cover operations (1 scraper bringing cover soil to the surface) are included in these calculations. A 70% control efficiency was assumed for watering of the haul roads and other surfaces.

G. Dust Activities and Control Methods

1. Dust Activities

There are several types of sources of dust and PM₁₀ at the landfill site which are as follows:

- o Light, medium and heavy vehicle traffic on paved and unpaved internal roads;
- o The unloading of waste at the working face of the landfill and the compaction of waste and placement of daily cover;
- o The wind borne emissions from disturbed areas and stockpiles (160 acres total)

⁸Based on a moisture content of 12% for cover and fill materials and a mean wind speed of 6.2 mph.

- o Construction activities (e.g. berms, roads, retention, barriers)

2. Control Measures

The above dust generating sources are subject to the following control measures:

- o Watering (including pre-wetting, operational and site stabilization);
- o Cover of city haul vehicles;
- o Reduced speed limit of 15 mph;
- o Altering load-in/load-out procedures (reduction of working face or change of orientation);
- o Suspension of landfill activities when wind-borne dust is leaving the property boundary;
- o Prompt and careful movement of cover materials;
- o Road maintenance

6. LANDFILL EMISSIONS

Using the equations and model described in Section 5 of this TSD, following emissions were calculated based on the total acceptance mass of 1.47 million megagrams (3.11 million cubic meters) up until the year 2009:

Pollutant	Emissions
NMOC	62 Mg
VOC	26.7 tpy
HAP	2.1 tpy
⁹ PM ₁₀	55 tpy
PM _{2.5}	2.4 tpy

⁹Includes fugitive emissions from vehicle travel on unpaved roads and other landfill activities. A 70% control efficiency is used for watering as a control measure on unpaved surfaces.

7. REGULATORY REQUIREMENTS AND MONITORING

A. Title V/PSD Review

In accordance with 40 CFR 60.752(b), any landfill with a design capacity over 2.5 million megagrams by mass or 2.5 million cubic meters by volume is subject to Part 70 permitting (Title V). Potential emissions of any criteria pollutant are below PSD review thresholds.

B. Applicable Requirements

1. NSPS WWW and Control System Requirements

This facility is subject to the requirements of 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. This standard requires that a calculation of NMOC emissions be made annually. The application indicates that the NMOC annual emissions rate is 62 megagrams. Therefore, a collection and control system is required in accordance with Section §60752.(b).(A) of the Subpart WWW.

2. NESHAP, AAAA Requirements

This facility is also subjected to the requirements of 40 CFR Part 63 Subpart AAAA, National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills. This subpart requires landfills to meet the startup, shutdown, and malfunction (SSM) requirements and also includes additional reporting requirements.

C. Greenhouse Gas Reporting

On October 30, 2009, the U.S. Environmental Protection Agency (EPA) published the final version of the Mandatory Greenhouse Gas (GHG) Reporting Rule in the Federal Register. Affected landfills that generate equivalent amounts of CO_{2e} (CO₂ equivalent based greenhouse warming potential) equal to or more than 25,000 metric tons are required to monitor and report emissions. On-going annual GHG reporting will be due March 31 of each calendar year for GHG emissions in the previous calendar year. This report shall be submitted directly to EPA.

D. Other Regulatory Emissions Limitations

1. Opacity and Reasonable Precautions

The facility must meet the federally enforceable 40% opacity limitation. For this purpose the permit also requires that reasonable precautions be

taken, and it includes a list of the methods to employ.

While PCAQCD has a locally enforceable 20% opacity standard (§2-8-300), it does not apply to fugitive sources, sources which already have another opacity standard under PCAQCD rules, or have an applicable NSPS. Therefore, 20% does not apply to the fugitive emissions from the landfill surface.

In line with other permits issued by PCAQCD, a semi-annual opacity screening requirement has been added to the permit. If such opacity screening shows there are visible emissions, a full Method 9 test is required.

2 Soil Moisture Content

Since the soil moisture content used for emission calculations is from AP-42 and not site specific, PCAQCD requires that a sampling program be conducted when the tipping rate exceeds 750 tons per day. The soil moisture content obtained will be used for determining the emissions under AP-42 Section 13.2.4

8. COMPLIANCE ASSURANCE MONITORING (CAM)

The requirements of 40 CFR 64 do not apply to this facility, since this facility is not a major source and no single emission unit satisfies the criterion of §64.2(a)(3). No single unit has a pre-control device emissions of 100 tpy or more of any regulated pollutant.

9. CONCLUSION AND PROPOSED ACTION

Based on the information supplied by the applicant, analyses conducted by the PCAQCD it is determined that the proposed project will not cause or contribute to a violation of any federal ambient air quality standards. Therefore, PCAQCD intends to issue to the applicant a unitary permit, including both approval to construct/modify pursuant to CAA Title I, and authority to operate, pursuant to CAA Title V, subject to the conditions set forth in the accompanying draft permit.