



**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO.66292**

Copper Mountain Landfill, Inc.

I. INTRODUCTION

This Class I Air Quality Control Permit #66292 is issued to Copper Mountain Landfill, Inc., the Permittee, for the continued operation of the Copper Mountain Landfill. This is a renewal of Permit #54565. This source is a municipal solid waste landfill. A Class I permit is required because an applicable regulation, New Source Performance Standard Subpart WWW “Standards of Performance for Municipal Solid Waste Landfills”, requires the Permittee to obtain a Title V permit.

A. Company Information

1. Facility Name: Copper Mountain Landfill
2. Facility Location: 34583 East County 12th Street
Wellton, Arizona 85356
Yuma County
3. Mailing Address: 34583 East County 12th Street
Wellton, Arizona 85356
Yuma County

B. Attainment Classification

This facility is located in an area which is designated attainment/unclassified for all criteria pollutants.

II. PROCESS DESCRIPTION

A. Process Description

Copper Mountain Landfill (CML) began operation in 1995 and the design capacity for the landfill is estimated at 54.5 million cubic meters. Based on the current compaction rates, this translate to approximately 61.4 million tons. With a growth rate of 1.5% per year, the facility is likely to achieve the design capacity by year 2118.

The primary activities at the landfill are the transportation and deposition of refuse along with the excavation and stockpiling of cover material and soil. A definite area of the landfill is excavated, lined, and prepared to receive waste. Cell construction continues as a cut-and-fill operation, and excavated material is used for daily, intermediate and final cover.

The CML accepts industrial and solid waste that includes the following materials:

- a. Municipal refuse and other wastes from household or commercial facilities
- b. Green Waste



- c. White goods
- d. Construction and demolition debris
- e. Asbestos
- f. Sewage sludge
- g. Petroleum contaminated soil not regulated as hazardous waste
- h. Fly ash

B. Control Devices

There are currently no process or control equipment at the Landfill. When the facility exceeds 50 Mg/yr of non-methane organic compounds (NMOCs), the Landfill will be required to design and install a landfill gas collection and control system (GCCS). NMOC emissions are estimated to be 48.92 Mg for the 2017 calendar year based on NSPS default values and site-specific NMOC concentration of 1,169 ppm_v measured as hexane. This site-specific value was obtained in 2013 test.

III. EMISSIONS

The natural decomposition of the waste materials generates NMOCs, VOCs and HAPs as surface emissions. Fugitive particulate matter (PM) emissions are due to landfilling activities and vehicle traffic on unpaved roads. Table 1, below, shows potential to emit for all applicable processes at the landfill.

Table 1: Potential Emissions

Pollutant	Emissions (lb/hr)	Emissions (tpy)
PM _{2.5}	2.35	6.36
PM ₁₀	14.82	26.44
CO	0.63	2.74
NO _x	0.69	3.03
SO ₂	0.05	0.20
VOCs	8.71	38.14
NMOCs	19.76	86.54
HAPs	1.56	6.84

IV. APPLICABLE REGULATIONS

Table 2 displays the applicable requirements for each permitted piece of equipment along with an explanation of why the requirement is applicable.

**Table 2: Verification of Applicable Regulations**

Unit	Control Device	Rule	Discussion
MSW Landfill	Required when NMOC > 50 Mg/yr	40 Code of Federal Regulation (CFR) Part 60 Subpart WWW 40 CFR Part 63 Subpart AAAA	Subpart WWW regulates emissions of landfill gas from MSW landfills and Subpart AAAA is triggered if size and emissions exceed threshold levels requiring a collection system as set forth in WWW.
MSW Landfill	Required when NMOC > 34 Mg/yr	40 Code of Federal Regulation (CFR) Part 60 Subpart XXX	This Subpart was stayed from May 31, 2017 and hence not incorporated in the permit.
Asbestos Handling	N/A	40 CFR Part 61.154 (Subpart M)	Standards for disposal of asbestos-containing waste
Fugitive dust sources	Water Trucks Dust Suppressants	A.A.C. R18-2 Article 6 A.A.C. R18-2-702	These standards are applicable to all fugitive dust sources at the facility.
Abrasive Blasting	Wet blasting; Dust collecting equipment; Other approved methods	A.A.C. R-18-2-702 A.A.C. R-18-2-726	These standards are applicable to any abrasive blasting operation.
Spray Painting	Enclosures	A.A.C. R18-2-702 A.A.C. R-18-2-727	This standard is applicable to any spray painting operation.
Demolition/renovation operations	N/A	A.A.C. R18-2-1101.A.8	This standard is applicable to any asbestos related demolition or renovation operations.
Mobile sources	None	A.A.C. R18-2-801	These are applicable to off-road mobile sources, which either move while emitting air pollutants or are frequently moved during the course of their utilization.

V. PREVIOUS PERMIT CONDITIONS

Permit No. 54565 was issued on December 17, 2012, for the continued operation of this facility.



Table 3 below illustrates if a section in Permit No. 66292 was revised or deleted.

Table 3: Permit No. 66292

Section No.	Determination		Comments
	Revised	Delete	
Att. A.	X		General Provisions - Revised to represent most recent template language.
Att. B.	X		Revised, please see below
Condition I.A	X		Revised to include Alternative Method-082 for visual emission surveys.
Section V		X	NSPS Non-Emergency internal combustion engine requirement was removed because the engine is a non-road engine.

VI. MONITORING REQUIREMENTS

A. NMOC Emissions

The Permittee is required to monitor and estimate NMOC emissions on an annual basis, per 40 CFR Part 60, Subpart WWW, to determine if and when the 50 Mg/yr threshold will be reached. When the threshold is reached, then a collection and control system is required, and additional monitoring requirements are triggered.

B. Fugitive Dust

1. The Permittee is required to keep record of the dates and types of dust control measures employed.
2. The Permittee is required to show compliance with the opacity standards by either conducting an ALT-082 method or having a Method 9 certified observer perform survey of visible emission from fugitive dust sources on a bi-weekly basis. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.
3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

C. Periodic Activities

1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.
2. The Permittee is required to record the date, duration, quantity of paint used, any applicable SDS, and pollution control measures of any spray painting project.
3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

D. Mobile Sources



The Permittee is required to keep records of all emission related maintenance performed on the mobile sources.

VII. COMPLIANCE HISTORY

There were 5 routine facility inspections and 9 compliance certification report reviews conducted for this facility for the current permit term. There is no compliance case pending for this facility.

VIII. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
GCCS	Gas collection and control system
CML	Copper Mountain Landfill
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
SDS	Safety Data Sheets
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Nominally less than 10 Micrometers
PTE	Potential-to-Emit
SO ₂	Sulfur Dioxide
TPY	Tons per Year
VOC	Volatile Organic Compound
NMOC	Non-methyl Organic Compound
yr	Year