STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1884-AOP-R9 AFIN: 72-00144

1. PERMITTING AUTHORITY:

Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Eco-Vista, LLC. - Waste Management of Arkansas, Inc.
2210 Waste Management Drive
Springdale, Arkansas 72762

3. PERMIT WRITER:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Solid Waste Landfill
NAICS Code: 562212

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
12/3/2024	Renewal	Add gasoline tank, CNG fueling station, and leachate tanks (2)
5/31/2024	Minor Mod	Add 300 scfm candlestick flare

6. REVIEWER'S NOTES:

1. Incorporate Minor Modification (approved 7/3/2024) to install a new 300-SCFM candlestick flare (SN-11) to combust gas transported from the construction and demolition (C&D) waste mass.
2. Reduce control efficiency applied to haul road fugitives from 90% to 75% to be consistent with how other facilities in the industry are permitted and revise calculations to reflect this change.

3. Revise emission estimates at SN-01, SN-02A/B, SN-09, SN-10 and SN-11 to reflect the usage of Waste Industry Air Coalition (WIAC) emission factors; previously emissions were estimated using AP-42 factors.
4. Reduce the sulfur concentration at SN-09 and SN-10 from 400 ppmv to 10 ppmv; the majority of sulfur components are removed from the landfill gas, in the gas cleaning plant, prior to being processed at SN-09 and SN-10. To ensure compliance with revised sulfur concentration estimates, a testing condition was added: Specific Condition #**Error! Reference source not found.**.
5. Removed the landfill gas to energy (LFGTE) operating scenario for engines SN-04 through SN-08. These engines will only operate using natural gas moving forward; emission estimates are revised to reflect this change. Additionally, instances where calculations were based on 8,400 hr/yr have been revised to be based on 8,760 hr/yr.
6. Add Specific Condition (SC) #**Error! Reference source not found.** to limit the hours of operation of the renewable natural gas plant (RNG) process flare to 1,752 hours per rolling 12-month period.
7. Revise Plantwide Condition #**Error! Reference source not found.** to reflect the landfill capacity allowed by Permit No. 0290-S1-R4; the solid waste permit for the facility.
8. Add landfill gas testing condition: SC#**Error! Reference source not found.**.
9. Add CO to SN-01 uncontrolled landfill gas emissions. The recently updated AP-42 emission factors have included CO from landfill gas.
10. Add 550 Gallon gasoline tank (SN-12), previously listed as an Insignificant Activity. This source is subject to NESHAP CCCCCC, because the facility is considered an area source of HAPs.
11. Add a Natural Gas Fueling Station for the facility's trucks.
12. Added two, 100,000-gallon leachate storage tanks as permitted sources. One of the two tanks was unpermitted, and both tanks are now being permitted as numbered sources rather than Insignificant Activities.
13. Remove all the Leachate Detection system tanks (LDS) and other leachate tanks that were included in the Insignificant Activities list. All LDS and leachate is stored in the two, 100,000-gallon leachate tanks.
14. Add Plantwide Single HAP and Total HAPs limit (Plantwide Conditions #**Error! Reference source not found.** & #**Error! Reference source not found.**)
15. Add complete NESHAP AAAA requirements to the plantwide conditions.

Emissions are changing by 389 tpy PM, 93.5 tpy PM_{10}, -35.7 tpy SO_2, 3.1 tpy CO, -35.1 tpy NO_x, 18.19 tpy H_2S, 1.95 tpy ammonia, and 0.78 tpy other air contaminants.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The site is the subject of numerous odor complaints over the past five years since the last renewal permit. This is a violation of 8 CAR § 40-701 and there was an informal enforcement action on 9/26/24.

There are currently no recent or active CAOs for this facility.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? N
- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	VOC (NMOC)	40 C.F.R. § 60 Subpart XXX
04 through 08	VOC, CO, NO_x	40 C.F.R. § 60 Subpart JJJJ
04 through 08	HAPs	40 C.F.R. § 63 Subpart ZZZZ
Facility	HAPs	40 C.F.R. § 63 Subpart AAAA
SN-12	HAPs	40 C.F.R. § 63 Subpart CCCCCC
Facility	Asbestos	40 C.F.R. § 61 Subpart M and Rule 21

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
11	July 3, 2024	-	-	-

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N
(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A
If not, explain why.

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
N/A		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Only compounds with a TLV of less than 1 mg/m3 are evaluated per the NCPS and the facility is limited to no more than 9.4 tpy of a single HAP and 22.87 tpy total HAP. SN-10 was modeled with the 50 ft shroud that the facility may install.

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acrolein	0.114	0.0125	0.208	N
Benzene	0.0639	0.007	0.2168	N
Hydrogen Sulfide (H_2S)	1.39	0.1529	4.44	N

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Hydrogen Fluoride	0.41	0.0451	0.905	N
POM/PAH	0.2	0.022	0.00542	Y
Mercury	0.01	0.0011	0.00011	Y

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Acrolein	2.29	0.291	Yes
Benzene	0.63	0.059	Yes
H_2S	13.9	8.19	Yes
HF	4.1	1.12	Yes

c) H_2S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H_2S Standards N
If exempt, explain:_____

Pollutant	Threshold value	Modeled Concentration (ppm or ppb)	Pass?
H_2S	20 parts per million (5-minute average*)	0.085	Y
	80 parts per billion (8-hour average) residential area	22.77	Y
	100 parts per billion (8-hour average) nonresidential area	22.77	Y

*To determine the 5-minute average use the following equation

$Cp = Cm\ (t_m/t_p)^{0.2}$ where

Cp = 5-minute average concentration
Cm = 1-hour average concentration
t_m = 60 minutes
t_p = 5 minutes

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip	Control Efficiency	Comments
01	WIAC * Trade Organization AP-42 if WIAC isn't available	VOC: Sum of WIAC VOC components HAPs: Varies	none	n/a	25% uncontrolled 75% routed to Flare 5,682 scfm LFG generation rate 50% methane content
02A/B Flares	PM – AP-42 2.4 Table 2.4-5 footnote a (11/98) SO_2 – AP-42 2.4.4.1 Eq. 3 VOC – WIAC CO & NO_X – AP-42 HAPs – WIAC	PM = 17 lb/10-6 dscf Methane (0.00102 lb/hr/dscfm) SO_2 = 400 ppmv Reduced S VOC: Sum of WIAC VOC Components @ 2% CO = 0.31 lb/MMBtu NO_X = 0.068 lb/MMBtu	Flares	NMOC – 98% HAPs - 98.0%	2, 2250 scfm = combined 4500 scfm max @8760 hr/yr @1012 BTU/scf Methane @50% Methane Concentration for PM, SO_2 & NO_X NMOC = 100% VOC
03	PM –AP-42 Section	Unpaved roads k=1.5 (PM_{10}) or 4.9(PM) lb/VMT s=6.4%	Water suppression, speed	75%	Other means to suppress dust are

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equip	Control Efficiency	Comments
	13.2.2 & 13.2.1	W=28.76 (construction trucks) or 26.87 (refuse trucks) P=110 days a= 0.9(PM_{10}) or 0.7 (PM) b=0.45 VMT construction = 231,540 VMT refuse=596,000 URF_{PM10}=1.65, 1.60 $URF_{PM2.5}$=0.16, 0.16 URF_{PM}=6.1, 5.91 Paved roads k=0.0022 (PM_{10}) or 0.011(PM) lb/VMT sL=7.4 g/m^2 W=26.87 tons P=110 days VMT = 570,264 PRF_{PM10}= 0.36 $PRF_{PM2.5}$= 0.09 PRF_{PM}= 1.80	limits, etc., as necessary		allowed, speed limits, plastic cover instead of soil, etc. 8760 hrs
04-08 IC Engines (Natural-gas Fueled)	AP-42 3.2 Table 3.3-2 Caterpillar 3516 Natural Gas Engine Spec.	<u>lb/MMBtu:</u> PM: 9.91E-03 PM_{10}: 7.71E-05 SO_2: 5.88E-04 <u>g/BHP-hr:</u> NO_X: 1.5 CO: 2.7 VOC: 0.790			1,148 bhp per engine 8,760 hr/yr
09	WIAC and AP-42 Chapter(s) 2.4.4.2 & 13.5	PM/PM10: 0.00102 lb/hr/dscfm VOC: Sum of WIAC VOC components SO_2: 10 ppmv <u>lb/MMBtu</u> NO_X: 0.068 CO: 0.31			98% destruction efficiency 15% Methane content 1,750 scfm 8,760 hr/yr CH_4 generation rate: 3,907,392 m^3/yr

<table>
<tr><th>SN</th><th>Emission Factor Source (AP-42, testing, etc.)</th><th>Emission Factor (lb/ton, lb/hr, etc.)</th><th>Control Equip</th><th>Control Efficiency</th><th>Comments</th></tr>
<tr><td>10</td><td>WIAC and AP-42
Chapter(s) 2.4.4.2 & 13.5</td><td>PM/PM10:
0.00102 lb/hr/dscfm

VOC: Sum of WIAC VOC components

SO_2: 10 ppmv

lb/MMBtu
NO_X: 0.068
CO: 0.31</td><td></td><td></td><td>98.0% Combustion Efficiency from Manufacturer
3,500 scfm
1,752 hr/yr
98% methane
CH_4 generation rate:
10,211,317 m^3/yr</td></tr>
<tr><td>11</td><td>WIAC and AP-42
Chapter(s) 2.4.4.2 & 13.5</td><td>PM/PM10:
0.00102 lb/hr/dscfm

VOC: Sum of WIAC VOC components

SO_2: 458 ppmv

lb/MMBtu
NO_X: 0.068
CO: 0.31</td><td></td><td></td><td>Peak LFG Combustion Per Manufacturer
300 scfm;

CH_4 generation rate:
2,232,497 m^3/yr
50% methane
8,760 hr/yr</td></tr>
<tr><td>12</td><td>AP-42 Chapter 7 Eq. 1 through 18</td><td>L_t=0.351 tpy
L_s=0.132 tpy
L_w=0.219 tpy</td><td></td><td></td><td>50,000 gal/yr</td></tr>
<tr><td>NG Fueling Station</td><td>SOCMII</td><td>Fueling side
<table><tr><th>Equipment Type</th><th>Gas/Vapor SOCMI Non-Leaker Emision Factor[1] (kg/hr)</th><th>Gas/Vapor SOCMI Non-Leaker Emision Factor[1] (lb/hr)</th><th>Total Number of Components</th></tr><tr><td>Shut-Off Valve at Truck</td><td>0.000131</td><td>0.00029</td><td>42</td></tr><tr><td>Line Drop Shuto-Off Valve</td><td>0.000131</td><td>0.00029</td><td>42</td></tr><tr><td>Main Line Shut-Off Valve</td><td>0.000131</td><td>0.00029</td><td>24</td></tr><tr><td>Line Connections</td><td>0.000081</td><td>0.00018</td><td>32</td></tr><tr><td>Hose Connections</td><td>0.000081</td><td>0.00018</td><td>42</td></tr><tr><td>Quick Detach</td><td>0.000081</td><td>0.00018</td><td>42</td></tr><tr><td>Other Connections</td><td>0.000081</td><td>0.00018</td><td>28</td></tr></table>Compressor side</td><td></td><td></td><td>23.8 ppm mercaptan</td></tr>
</table>

<table>
<tr><th>SN</th><th>Emission Factor Source (AP-42, testing, etc.)</th><th>Emission Factor (lb/ton, lb/hr, etc.)</th><th>Control Equip</th><th>Control Efficiency</th><th>Comments</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th>Equipment Type</th><th>Gas/Vapor SOCMI Non-Leaker Emision Factor[1] (kg/hr)</th><th>Gas/Vapor SOCMI Non-Leaker Emision Factor[1] (lb/hr)</th><th>Total Number of Components</th></tr>
<tr><td>Compressors</td><td>0.0894</td><td>0.1971</td><td>2</td></tr>
<tr><td>Pressure Relief Valves on Compressors</td><td>0.0447</td><td>0.0985</td><td>42</td></tr>
<tr><td>Flanges</td><td>0.0000810</td><td>0.00018</td><td>24</td></tr>
<tr><td>Connections</td><td>0.0000810</td><td>0.00018</td><td>60</td></tr>
<tr><td>Small Pressure Relief Valves</td><td>0.0447</td><td>0.0985</td><td>6</td></tr>
<tr><td>Valves</td><td>0.000131</td><td>0.0003</td><td>12</td></tr>
</table>
</td><td></td><td></td><td></td></tr>
<tr><td>Leachate tanks</td><td>Water MDLs

Equilibrium equations and Henry’s law</td><td>HAP emission are based on water quality MDLs, various leachate tests performed for the groundwater monitoring show mostly ND for HAPs. Assuming HAPs = all MDLs overestimates emissions because the ND level for many of these are below 10 ug/L

See application for ammonia emission calculations</td><td></td><td></td><td>Dependent on aeration, pH, temperature, and TAN</td></tr>
</table>

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01	Speciated HAPs	EPA Method TO-15	One-time test, Within 180 days of permit issuance and 60 months thereafter	Confirm estimates
	methane	Section 8.3.1 of EPA Method 21 of Appendix A-7 of 40 C.F.R Part 60 *5-10 cm from ground*	Quarterly and Re-test exceedances	40 C.F.R. §§ 63.1958, 63.1960
04-08	CO NO_X	EPA Methods 7E and 10	Within 180 Days of initial startup plus every 8760 op hours or 3 years whichever comes first	Subpart JJJJ, §60.4243(b)(2)(ii)
04-08	VOC	EPA Methods 25A & 18	Within 180 Days of initial startup plus every 8760 op hours or 3 years whichever comes first	NSPS – 40 C.F.R. Part 60, Subpart JJJJ
09 & 10	SO_2 TRS	EPA Method 6C EPA Method 16C	One-time test, Within 60 days of permit issuance	Confirm sulfur content through flares
Leachate Tank	TAN (total ammonia nitrogen)	Wet Chemistry by Method 350.1	Monthly	Confirm and track for emission purposes
	pH	Meter, onsite		
	Temperature	Meter, onsite		

17. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
Facility GCCS	Pressure at each Wellhead	Pressure Gauge	Monthly	Y, Exceedances
	O_2 or N_2 Concentration at each Wellhead	O_2: Oxygen Meter Method 3A or 3C N_2: Method 3C	Monthly	Y, Exceedances
	Temperature at each Wellhead	Temperature Gauge	Monthly	Y, Exceedances
	Surface methane concentrations	organic vapor analyzer, flame ionization detector, or other portable monitor	Quarterly & re-monitor on schedule at exceedances	Y, Exceedances
	If temp. exceeds 145ºF at a well – Conduct Enhanced Monitoring oxidation events, O_2, Temperature, methane, CO	Visual observations of oxidation events, O_2: Method 3A or 3C, Monitor Temperature at wellhead and every 10 vert. feet per methane: Method 21, Monitor CO: Method 10 of Appendix A-4 to Part 60	Weekly following exceedance	Y
02A/B, 10, 11	Presence of Flame	Heat Sensing Device (UV beam sensor or thermocouple)	Continuous	Y, Exceedances
02A/B,04-08, 09, 10, 11	Gas flow	Scfm	15 minute intervals	Y

18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
Facility	Total amount of waste-in-place	23,364,000 cubic yards	Annually	Yes
	Plot Map of collector system	None	On-going	No
	Asbestos-containing or non-degradable waste: nature, date, quantity received & location	PWC 16	On-going	No
	Methane Surface Testing	Less than 500 ppm	Quarterly	Y
	Initial design capacity report, amended design capacity report, NMOC emission report, GCCS design plan, revised GCCS design plan, Equipment Removal Report, SAM report, Initial perf. test report, Corrective action & timeline, 24-hour temp. report (>170^{o}F)	PWC 17	On-going/ SAM semi-annually	N/ SAM-Y
	Max gas generation flow rate; Density of wells, horz. collectors, surf. collectors,	PWC 48	Keep for the life of control system	Y, initial plans and exceedances

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	or other gas extraction devices; Continuous records of pilot flame/flame monitoring, all records of periods when flame was absent; Bypass records; Site-specific treatment monitoring plan.			
	Periods when collection system or control device is not operating;	PWC 49c	Upon on each instance	Y
	Failure records	date, time, and duration of each failure and the cause of such events	Upon on each instance	Y
	Failure to meet applicable standard	Record and retain a list of affected sources or equipment	Upon on each instance	Y
	corrective actions taken	PWC 49e	Upon on each instance	Y
	Performance evaluation plan revisions – Keep previous versions of the performance evaluation plan on record for 5 years after each revision to the	PWC 49f	When updated, Keep active plans for the life of the system	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	plan - This includes a corrective action plan.			
	Plot map showing each existing and planned collector in the system, providing a unique identification location label for each collector. Installation date and location of all newly installed collectors; documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection; any nonproductive areas excluded from collection as provided	Submit design plans to permits for review 90 days prior to changing per PWCs.	When updated, Keep for the life of the system	Y, initially and as updated
	All GCCS exceedances of the operational standards in § 63.1958, the reading in the subsequent month whether or not the second	PWC 51	Upon on each instance	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	reading is an exceedance, and the location of each exceedance. wellhead temperature monitoring exceedances, wellhead nitrogen level or oxygen level exceedances, all enhanced monitoring activities. If 24-hour high temperature report is required, keep a record of the email transmission. Root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed, for action(s) not already completed - a schedule for implementation, including proposed commencement and completion dates, and a copy of any comments			

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	or final approval on the corrective action analysis or schedule from the Administrator.			
	GCCS monitoring data for all parameters measured	PWC 52	Continuous (15 min)	N
SN-02A, B, SN-04, SN-05, SN-06, SN-07, SN-08, SN-09, SN-10, and SN-11	Total CO emissions from fuel combustion, flares, engines, and calculations	245.0 tons per rolling 12-month period	Monthly	Yes
SN-01, 02A, B, SN-04, SN-05, SN-06, SN-07, SN-08, SN-09, SN-10, and SN-11	Single HAP and Total HAPs calculations	9.40 tpy Single HAP and 22.87 tpy Total HAPs per rolling 12 month period	Monthly	Yes
04 thru 08	Maintenance Log	Maintain Good Operating Practices Maintain records	Monthly	No
	Notification, documentation (tests) of meeting emissions	Maintain Good Operating Practices	On-going	Yes
	List of Engines w/model date and purchase date	Keep for life of engine	Within 30 days of installation	No
	Operating Hours	Non-resettable Hourly Operating Meter	On-going	Yes
02A, 02B, 04 thru 08, 09, 10,11	Gas flow in scfm	For CO Calculations	Every 15 minutes	Yes
10	Hours of operation	1,752 hr per rolling 12 month period	Monthly	Yes

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
11	Flare exit velocity	Calculations as described by 40 C.F.R. § 60.18(f)(4)	Initial	No
12	Gasoline throughput	10,000 gallons/month 50,000 gallons/yr	Monthly	No
Leachate tank 2	Total ammonia nitrogen, pH, and temperature	Varies, track for emission calculation purposes	Monthly	Yes

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
Off-site	5%	Inspector Observation	Observation & Dust Suppression methods, NPDES permit required
02A/B	0%	40 C.F.R. § 60.18(b) through (f)	Method 22 initial only
04 through 08	5%	8 CAR § 40-401 and Ark. Code Ann.	Natural gas as the only fuel
09	5%	8 CAR § 40-401 and Ark. Code Ann.	Post-treatment tail gas as the only fuel
10	0%	8 CAR § 40-401 and Ark. Code Ann.	Method 22 initial only
11	0%	8 CAR § 40-401 and Ark. Code Ann.	C&D Landfill gas as the only fuel/propane for pilot

20. DELETED CONDITIONS:

Former SC	Justification for removal
#16 through #20 & #26	The facility no longer operates using the LFGTE scenario.
PW 15	Contradicted NESHAP 4A language and did not appear in the NESHAP despite being in that section. No cite was attached.

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
500 Gallon Used Oil Tank	A-3			1.00E-05				1.00E-05
350 Gallon Engine Oil Tank	A-3			1.50E-05				1.50E-05
350 Gallon Transmission Oil Tank	A-3			1.50E-05				1.50E-05
350 Gallon Hydraulic Oil Tank	A-3			1.50E-05				1.50E-05
350 Gallon Hydraulic Oil Tank	A-3			1.50E-05				1.50E-05
550 Gallon Diesel Fuel Tank	A-3			2.41E-03				2.41E-03
2,000 Gallon Diesel Fuel Tank	A-3			4.73E-03				4.73E-03
Solidification Activities	A-13	2.55E-03						
Parts Washer	A-13	0.44		4.79			5.97E-06	2.98E-05

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
1884-AOP-R8

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Eco-Vista, LLC. - Waste Management of Arkansas, Inc.
Permit Number:1884-AOP-R9
AFIN:72-00144

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	1104.2
Permit Type	Modification	Permit Fee $	10257.03

Minor Modification Fee $	500
Minimum Modification Fee $	1000
Renewal with Minor Modification $	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	364.5
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: *Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

Air Contaminants: *All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		373.8	762.8	389	389	762.8
PM_{10}		115.9	209.4	93.5		
$PM_{2.5}$		0	0	0		
SO_2		120.9	85.2	-35.7	-35.7	85.2
VOC		65.6	81.1	15.5	15.5	81.1
CO		245	248.1	3.1		
NO_X		179.4	144.3	-35.1	-35.1	144.3

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Single HAP	☐	9.4	9.4	0		
Total HAP	☐	22.87	22.87	0		
H2S	☑	0	18.19	18.19	18.19	18.19
Ammonia	☑	0	1.95	1.95	1.95	1.95
Other Air Contaminants	☑	0	0.78	0.78	0.78	0.78
HF	☑	0	2.71	2.71	2.71	2.71
HCl	☑	0	6.61	6.61	6.61	6.61
Methyl Chloroform	☑	0	0.03	0.03	0.03	0.03
Perchloroethylene	☑	0	0.22	0.22	0.22	0.22
Methylene Chloride	☑	0	0.31	0.31	0.31	0.31