

NORTH CAROLINA DIVISION OF AIR QUALITY		Region: Raleigh Regional Office County: Johnston NC Facility ID: 5100188 Inspector's Name: Charles Marshall Cannon Date of Last Inspection: 09/21/2009 Compliance Code: 3 / Compliance - inspection
Air Permit Review – 1 st Time Title V processed in accordance with 15A NCAC 2Q .0501(c)(1) – one step process		
Permit Issue Date: February ___2011		
Facility Data		Permit Applicability (this application only)
Applicant (Facility's Name): Johnston County MSW Landfill		SIP: 15A NCAC 2Q .0501(c)(1), 2D .0524, 2D .1806
Facility Address: Johnston County MSW Landfill 680 County Home Road Smithfield, North Carolina 27577		NSPS: Subpart WWW NESHAP: N/A (not triggered yet) PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A
SIC: 4953 / Refuse Systems NAICS: 562212 / Solid Waste Landfill		
Facility Classification: Before: Small After: Title V Fee Classification: Before: Small After: Title V		
Contact Data		
Facility Contact	Authorized Contact	Permit/Technical Contact
Rick Proctor Solid Waste Manager 309 E. Market Street Smithfield, NC 27577 (919) 934-4576 rick.proctor@johnstonnc.com	Rick Hester Johnston County Mgr. P. O. Box 1049 Smithfield, NC 27577 (919) 989-5100	Timothy Broome Dir. of Utilities and Engr. (919) 209-8333 P.O. Box 2263 Smithfield, NC 27577 tim.broome@johnstonnc.com
		Application Data
		Application Number: 5100188.09B Date Received: 12/21/2009 Application Type: Modification Application Schedule: TV-1st Time
		Existing Permit Data
		Existing Permit Number: 08844R05 Existing Permit Issue Date: 10/18/2010 Existing Permit Expiration Date: 11/30/2014
Consultant: Richardson Smith Gardner & Associates email: cybele@rsgengineers.com		Contact: Cybele M. Brockmann Phone: (919) 828-0577
Review Engineer: Booker Pullen Regional Engineer: Charles McEachern Review Engineer's Signature: _____		Comments / Recommendations:
Begin Date: June 1, 2010		Issue: 08844T06 Permit Issue Date: February ___2011 Permit Expiration Date: November 30, 2014

I. Introduction/Description:

The Johnston County Landfill is requesting a 1st Time Title V permit for this facility. This is an existing landfill that is located at 680 County Home Road, Smithfield, North Carolina. This landfill began accepting waste in 1973, consists of six municipal solid waste phases (1-5, and 4A). Phases 1-2-3, and 4 are unlined and closed. Phase 5 is lined and inactive. Phase 4A is lined, active, and consists of three cells. Operational units at this facility include five municipal solid waste landfill units, and two construction & demolition units (C&D). The Johnston County Landfill received a permit from the Division of Solid Waste to operate Phase 4A, Cell 3. This solid waste permit caused the design capacity of the landfill to exceed the Title V thresholds (greater than 2.5 million Mg by mass and greater than 2.5 million cubic meters by volume) and required the landfill to submit an application to the Division of Air Quality (DAQ) for a Title V permit within 90 days (December 27, 2009). The NMOC emission still remain below 50 Mg per year according to an April 2009 Tier 2 test.

Johnston County Landfill submitted a Title V permit application (5100188.09B) to the DAQ Raleigh Central office on December 21, 2009. The application was considered complete on that date. This application will be processed in accordance with 15A NCAC 2Q .0501(c)(1) and will go through a 30 day public notice and a 45 day EPA review.

Note: The Johnston County Landfill has entered into an agreement with BlueSource to construct and operate an active gas collection and control system (GCCS). Also, the Johnston County Landfill and BlueSource are currently evaluating a landfill-gas-to-energy project for this the landfill facility to sell electricity to Progress Energy. Permit No. 08844R05 was issued on October 18, 2010 to install a landfill gas-fired flare system and to remove all of the insignificant activity solar flares from the permit.

II. Purpose of this application (5100188.09B):

Apply for a first time Title V permit. This facility currently operates under Air Permit No. 08844R05.

III. Changes to existing Title V Permit per application 55100188.09B

Old Page No.	New Page No.	Condition No.	Changes
Page 1	Page 1	Cover letter	Changed: Issue date of permit, 1 st sentence to describe the type of permit, revision date of permit,
Page 2	Page 2	Cover letter	Changed: Date in the heading, issue date of the permit, added EPA to copy list, Added Attachment A and B descriptions to bottom of page
N/A	Page 3	Cover letter	Added insignificant activities list as an attachment, and the “changes to the permit “ table to reflect this permit modification
Body of the Permit			
Page 1	Page 1	Cover page of permit	Changed: Issue date, effective date, replaces permit No., Expiration date, permitted source layout, reformatted pages
Pages 1-7	Pages	Specific Limitations and Conditions	Reformatted entire permit and added regulatory requirements to reflect a Title V permit
N/A	Pages 9-18	General Conditions	Added Title V General Conditions to permit

IV. Statement of Compliance:

The DAQ has reviewed the compliance status of this facility. The latest inspection of the facility was by Mr. Charles Marshall Cannon of the Raleigh Regional Office. The inspection was performed on September 21, 2009. The report states that the facility appeared to be in compliance with all applicable requirements.

V. Summary Of The Emission Sources at this facility:

Emission Source ID	Emission Source Description	Control Device	Control Device Description
ES-01 NSPS, Subpart WWW	Municipal solid waste landfill	CD-1	Landfill gas-fired utility flare (eight inch diameter, 1250 scfm maximum flow rate)

VI. Source-by Source Evaluation:

A. Municipal solid waste landfill (ID Nos. ES-01):

1. Description: This facility is a Municipal Solid Waste Landfill (ID No. ES-01) that also accepts construction and demolition debris. The gas collection and control system will consist of a utility type Perennial Flare (eight inch diameter) designed to operate at a maximum LFG flow rate of 1,250 standard cubic feet per minute. The flare stack will be 24 feet tall. The blower/flare system will contain a flame arrestor, sampling ports, shut-off valves, and a ground-adjustable flow meter. The outlet temperature will be between 1000 and 1800 degrees Fahrenheit. The open flare is ignited on propane, then the blower(s) turn on and the LFG is pulled from the landfill and combustion begins at the flare tip.

2. Applicable Regulatory Requirements for this modification:

This landfill is subject to 40 CFR Part 60, Subpart WWW because the facility was built after May 30, 1991. On September 28, 2009, the landfill was issued a permit by the Division of Solid waste to operate Phase 4A, Cell 3 (Fill Sequence 1), increasing the design capacity of the landfill above the NSPS thresholds. With the addition of Phase 4A at this landfill, the design capacity of the landfill is greater than 2.5 million Mg by weight, and 2.5 million cubic meters by volume. Therefore, it is subject to the Title V requirements of the Clean Air Act in accordance with 40 CFR Part 60, Subpart WWW.

This landfill is not required by regulation to install a gas collection and control system per NSPS, Subpart WWW because the calculated NMOC emission rate remains below 50 Mg/year. The landfill completed a Tier 2 NMOC test in April 2009 using the EPA Methods 3C and 25C and calculated that the NMOC emission rate will be 30 Megagrams in the year 2014.

This facility is not a major source of HAPs (10/25). Instead it is classified as an area source landfill. This landfill is **not** subject to 40 CFR Part 63, Subpart AAAAA “National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills” at this time because the facility is not yet required to install a gas collection and control system per NSPS, Subpart WWW. [See 40 CFR §63.1935(3)]

Emission Factors and Calculations (From the engineering review for permit revision R05)

Potential emissions and emission factors associated with the new flare are provided in the table below.

Compound	LFG Flare Emission Factors	PTE LFG Flare Emissions (tpy)
NO _x	0.068 lb/mmBtu ⁽¹⁾	11.17
CO	0.37 lb/mmBtu ⁽¹⁾	60.77
TSP	17 lb/10 ⁶ ft ³ CH ₄ ⁽²⁾	2.79
PM-10	17 lb/10 ⁶ ft ³ CH ₄ ⁽²⁾	2.79
PM-2.5	17 lb/10 ⁶ ft ³ CH ₄ ⁽²⁾	2.79
VOCs	⁽³⁾	0.19
NMOC	98% destruction ⁽⁷⁾	0.49
SO ₂	35.5 ppmv TRS ⁽⁴⁾	1.76
HAPs/TAPs ⁽⁶⁾	calculated	1.37
HCl ⁽⁵⁾	42.0 ppmv Cl	1.29

Notes:

- (1) – NO_x and CO emission factors were obtained from EPA AP-42 Section 13.5 for Industrial Flare.
- (2) – Emission factor obtained from AP-42 Section 2.4. Table 2.4-5.
- (3) – Per AP-42 Section 2.4, VOC emissions are 39% of non-methane organic compound (NMOC) emissions
- (4) – SO₂ emissions are based on AP-42, Section 2.4 concentration of 35.5 ppmv of total reduced sulfur (TRS) when no site-specific data are available.
- (5) HCl emissions are based on the estimated amount of Cl in LFG, or 42.0 ppmv when no site-specific data are available, per AP-42 Section 2.4.
- (6) HAPs/TAPs emissions are based on factors from AP-42 Section 2.4.
- (7) Manufacturer’s guarantee.

PTE Heat Release of Flare: based on a heating value of approximately 500 Btu/scf.

$$(1250 \text{ scfm}) * (500 \text{ Btu/scf}) * (60 \text{ min/hr}) * (1 \text{ Million Btu(mmBtu)}/10^6 \text{ Btu})$$

$$= \mathbf{37.5 \text{ mmBtu/hr}}$$

NO_x PTE Emissions:

$$(0.068 \text{ lb NO}_x/\text{mmBtu}) * (37.5 \text{ mmBtu/hr}) * (8760 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = \mathbf{11.17 \text{ tpy NO}_x}$$

CO PTE Emissions:

$$(0.37 \text{ lb CO/mmBtu}) * (37.5 \text{ mmBtu/hr}) * (8760 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = \mathbf{60.77 \text{ tpy CO}}$$

PM PTE Emissions:

LFG consumed = 1,250 cfm @ 50% methane – maximum design rate for the flare

From AP-42 Section 2.4, Table 2.4-5, note “a”:
 $(17 \text{ lb}/106 \text{ ft}^3)/(16,700) = 1.02\text{E-}03 \text{ lb/hr-dft}^3/\text{min}$

$$(1.02\text{E-}03 \text{ lb/hr-dft}^3/\text{min}) * (1,250 \text{ scfm LFG}) * (0.5[50\% \text{ CH}_4 \text{ content}]) * (8760 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lb}) = \mathbf{2.79 \text{ tpy TSP/PM-10/PM-2.5}}$$

VOC PTE Emissions:

Using note “c” from AP-42 Table 2.4-2, the default VOC content is assumed to be 39% of NMOC emissions by weight. NMOC emissions were calculated using Tier 2 testing results for the landfill (included in the application package) and were found to be 0.49 tons per year.

$$0.49 \text{ tons} * 0.39 = \mathbf{0.19 \text{ tpy VOC}}$$

SO₂ PTE Emissions:

Since site-specific data for total reduced sulfur (TRS) in the LFG is unknown, the published mean concentration of TRS from AP-42 Section 2.4 is used, or 35.5 ppmv. The molecular weight of sulfur is 32.06 lb/lbmole. (See application for further breakdown of all SO₂ calculations).

$$\text{Molar flow rate of LFG to the flare} = (1250 \text{ cfm}) * (60 \text{ min/hr}) * (1 \text{ atm}/[(0.7302 \text{ atm ft}^3/\text{lbmole R}) * (520^\circ \text{ R})]) = 197.5 \text{ lbmole fuel/hr}$$

$$(35.5 \text{ lbmole H}_2\text{S}/106 \text{ lbmole fuel}) * (197.5 \text{ lbmole fuel/hr}) * (32.06 \text{ SO}_2/\text{lbmole H}_2\text{S}) * (2 \text{ lb SO}_2/\text{lb S}) * (1 \text{ ton}/2000 \text{ lb}) * (8760 \text{ hr/yr}) = \mathbf{1.76 \text{ tpy SO}_2}$$

HCl PTE Emissions:

HCl emissions are formed when chlorinated compounds in LFG are combusted in control equipment. Equations (3), (4), and (10) from AP-42 Section 2.4 were utilized to estimate HCl emissions. A default concentration of 42.0 ppmv was used for total chloride concentration since site-specific values were unknown. The full equations for this calculation can be viewed in the air permit application and are not included here due to the inability to clearly show complex equations without the use of an equation editing software tool. The facility’s calculations have been reviewed; however, and they appear to be correct with one exception. A collection efficiency of 100% was utilized in Equation 10 for η_{col} when the default efficiency (according to AP-42) of 75% should have been used. This error has been overlooked however; since the controlled emissions of HCl are actually higher when using a higher collection efficiency, thus resulting in a higher and more conservative potential emission rate of HCl.

$$\text{HCl emissions} = \mathbf{1.29 \text{ tpy}}$$

Regulated Pollutant	Limits/Standards	Applicable Regulation
Nonmethane organic compounds (NMOC)	NMOC annual emission rate less than 50 Mg per year	15A NCAC 2D .0524 40 CFR Part 60, Subpart WWW
Odorous emissions	Apply suitable odor control measures “State-enforceable only”	15A NCAC 2D .1806
Fugitive Dust	Regulation will be listed as a General Condition MM	15A NCAC 2D .0540
Toxic air pollutants	Hydrogen chloride (hydrochloric acid) – modeled limit	15A NCAC 2D .1100
	TPER evaluation	15A NCAC 2Q .0701, .0702, .0706 and .0709

a. **15A NCAC 2D .0524, 40 CFR Part 60, Subpart WWW "New Source Performance Standards"**

Regulation Analysis

- i. The Johnston County Landfill was modified after May 1, 1991, and is subject to 40 CFR Part 60, Subpart WWW. It is subject to Title V because the design capacity of the landfill is greater than 2.5 million megagrams (2.75 million tons) by mass and 2.5 million cubic meters by volume.

According to Tier 2 testing performed by this facility in April 2009, the NMOC emissions will remain below 50 Mg through the year 2014. Therefore a gas collection and control system is not required at this time per the NSPS regulation. Because the NSPS does not require a gas collection and control system, the last MACT is not triggered for this facility requiring a site-wide toxic air pollutant evaluation. However, air toxic modeling is required for this facility because of the recent regulatory (15A NCAC 2Q .0701, .0702, .0706 and .0709) changes (effective July 10, 2010) to remove the exemption to exclude combustion sources as emitters of toxic air pollutants. This will be further addressed in the Air Toxics Section of this review. Also, the permit will require annual NMOC emissions reporting to track the NMOC emissions from this facility.

Testing [15A NCAC 2Q .0524, 40 CFR §60.754]

- ii. If emission testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0524, 40 CFR §60.754 and General Condition JJ located in Section 3 of the Title V Permit. If the results of this test are above the limits given in 40 CFR Part 60, Subpart WWW, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0524, Subpart WWW.

iii. **Standards For Air Emissions From Municipal Solid Waste Landfills** [40 CFR Part 60, §60.752]

(A) When this landfill has a design capacity equal to or greater than 2.5 million megagrams by mass and 2.5 million cubic meters, with a calculated NMOC emission rate equal to or greater than 50 megagrams per year, they shall submit a gas collection and control system design plan prepared by a professional engineer who is registered in the State of North Carolina, within one year of the annual report that shows that NMOC emissions will exceed 50 Mg per year.

- (1) The collection and control system design plan shall include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions of 40 CFR §§60.753 through 60.758 proposed by the owner or operator.
- (2) The collection and control system design plan shall either conform with specifications for active collection systems in §60.759 or include a demonstration to the Administrator's satisfaction of the sufficiency of the alternative provisions to §60.759.

(B) After the approval of the collection and control system design plan, the owner and operator shall install a collection and control system that captures the gas generated within the landfill as required by paragraphs (b)(2)(ii)(A) or (B) and (b)(2)(iii) of this section within 30 months after the first annual report in which the emission rate equals or exceeds 50 megagrams per year, unless Tier 2 or Tier 3 sampling demonstrates that the emission rate is less than 50 megagrams per year, as specified in 40 CFR §60.757(c)(1) or 2.

- (1) An active collection system shall:
 - (a) Collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active; or 2 years or more if closed or at final grade.
 - (b) Collect gas at a sufficient extraction rate and be designed to minimize off-site migration of subsurface gas.
 - (c) Route all the collected gas to a control system that complies with the requirements in either paragraph (b)(2)(iii) (A), (B) or (C) of Section 60.752.
 - (d) The control device shall be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in §60.756.

Monitoring/Recordkeeping [40 CFR Part 60, §60.756 and §60.758]

- iv. Except as provided in 40 CFR §60.752(b)(2)(i)(B), each owner or operator of an MSW landfill subject to the provisions of §60.752(b) shall keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report which triggered §60.752(b), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable.
- v. Each owner or operator subject to the provisions of this subpart shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in §60.759(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in §60.759(a)(3)(ii).

Reporting [40 CFR Part 60, §60.757]

- vi. This facility is subject to the requirements of 40 CFR Part 60, Subpart WWW and shall submit an NMOC emission rate report to the Regional Office annually, except as provided for in paragraphs (b)(1)(ii) or (b)(3) of 40 CFR §60.757. The Regional Office may request such additional information as may be necessary to verify the reported NMOC emission rate.

The NMOC emission rate report shall contain an annual or 5-year estimate of the NMOC emission rate calculated using the formula and procedures provided in §60.754(a) or (b), as applicable.

- vii. The Permittee shall submit a **summary report** of monitoring and recordkeeping activities by January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

b. 15A NCAC 2D .1806 "Control And Prohibition Of Odorous Emissions" (State-enforceable only)

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

c. 15A NCAC 2D .0540 "Fugitive dust"

- Paved and unpaved roads
- Landfill earth moving operations

1. **Description:** Fugitive dust emissions will be generated from the facility roadways and landfill operations.

2. **Applicable Regulatory Requirements for this modification:**

Regulated Pollutant	Limits/Standards	Applicable Regulation
PM	Work practice standards with written compliance plan (General Condition "MM) - State Enforceable Only	15A NCAC 2D .0540

Fugitive Dust Control Requirement [15A NCAC 2D .0540] - **STATE ENFORCEABLE ONLY**

As required by 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 2D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

B. Facility Information:

40 CFR Part 63, Subpart AAAA.

When this facility becomes subject to 40 CFR Part 63, Subpart AAAA, (when landfill is required by 40 CFR Part 60, Subpart WWW to install a gas collection and control system) it will also become subject to 15A NCAC 2Q .0700 "Toxic Air Pollutant Procedures". At that time, this landfill will be subject to a facility-wide toxics analysis and/or modeling demonstration and must submit this information through a permit modification unless the facility has already performed a facility-wide toxics demonstration. Currently this facility is not subject to 40 CFR Part 63, Subpart AAAA but does intend to install a voluntary gas collection and control system.

The regulatory language and compliance information will be added to the permit when the active gas collection and control system is required by NSPS Subpart WWW to perform surface monitoring, well head monitoring, etc.

VII. A Professional Engineers Seal **is not** required at this time for this landfill. However, the application was sealed by Mr. Pieter K. Scheer.

A PE seal will be required when this facility submits its gas collection and control design plan in accordance with NSPS Subpart WWW.

VIII. A consistency determination was received along with the application. Kevin J. Sigmon, Planner for Johnston County Planning Department signed the determination on December 12, 2009.

IX. An application fee **is not** required. This application was submitted because of NSPS, Subpart WWW requirements.

X. The appropriate number of copies of the application was received by the DAQ on December 21, 2009.

XI. The application did contain the Reduction and Recycling Form.

XII. The application **was not** signed by an authorized official as defined by 15A NCAC 2Q .0304(j) for municipalities. A certified letter was sent to Mr. Timothy G. Broome on January 19, 2010 requesting the signature pages of this application be resubmitted with a "Responsible Officials" signature that met the requirements of 15A NCAC 2Q .0304(j). The appropriate documentation was received by the Raleigh Central Office on February 8, 2010.

XIII. MACT (40 CFR Part 63, Subpart AAAA):

The EPA promulgated a NESHAP (MACT) for municipal solid waste landfills on January 16, 2003. This MACT applies to landfills that are major for HAPs (10 tons per year of a single HAP or 25 tons per year of all HAP in aggregate) **or** to a landfill that has a mass ≥ 2.5 million megagrams and a volume of ≥ 2.5 million as well as an NMOC emission rate that exceeds 50 megagrams per year (area source of HAPs). MACT Subpart AAAA also states that the facility is not subject to this regulation until the NSPS requires that a gas collection and control system has to be installed at the facility.

Once the facility crosses the threshold mentioned above, the facility will be required to:

- A. Submit a gas collection and control system design plan prepared by a professional engineer to the DAQ within one year after the first annual report in which the emission rate of NMOC exceeds 50 Mg. [40 CFR §63.752 (b)(2)(i)]
- B. Build a gas collection system that meets the requirements of the NSPS, Subpart WWW.
- C. Submit the initial annual report within 180 of the installation and startup of the gas collection and control system. This initial annual report shall include the initial performance test for the system. [40 CFR §63.757(f)]
- D. The gas collection and control system should be installed within 30 months after the first annual report in which the emission rate of NMOC exceeds 50 Mg. [40 CFR §63.752(b)(2)(ii)]

XIV. Air Toxics:

In accordance with 15A NCAC 2Q .0705, existing facilities (those in operation before October 1, 1993) that may be subject to a MACT standard under section 112 of the Clean Air Act Amendments, must comply with the Toxic Air Pollutant Standards (15A NCAC 2D .1100) by the deadline that the facility is required to comply with the applicable NESHAP. The date by which this landfill is required to install and operate the collection and control system under NSPS, Subpart WWW, represents the date that the facility must have performed a facility wide toxics evaluation to demonstrate compliance with the North Carolina Air Toxics Program. This landfill **is not** subject to the LAST MCT toxics requirements at this time.

However, the North Carolina Air Toxics regulations were revised and became effective in Jun 2010. Air toxic modeling is now required for this facility because of this recent regulatory (15A NCAC 2Q .0701, .0702, .0706 and .0709) change to remove the exemption to exclude combustion sources as emitters of toxic air pollutants.

This facility performed dispersion modeling for hydrogen chloride (created in the combustion process at the flare) and evaluated the facility wide emissions of toxic air pollutants emitted from the landfill (after control) in the modification request for air permit No. 08844R05. Hydrogen chloride was modeled at less than 1 percent of the hourly AAL.

XV. Public Notice

A thirty-day public notice **is required** for this one-step Significant Modification.

Public notice: The 30 day public notice period was from XXX, 2009 through XX, 2009. ____ public comments were received by the DAQ for this permit application.

EPA 45-Day review Period: The DAQ sent copies of the appropriate information to the USEPA prior to the public notice. The EPA 45-day review period was from _____2009 through XXX, 2009. The USEPA ____ have any comments on this modification.

XVI. NonAttainment:

Johnston County is currently designated as attainment for the eight-hour ozone standard.

XVII. Prevention of Significant Deterioration (PSD)

This facility is a minor source for PSD. There are no modifications in this permit application. Therefore, PSD does not apply.

The PSD Minor Source baseline date for PM₁₀ and SO₂ was triggered in Johnston County on October 28, 1981. This permit modification does not increase the emissions of either pollutant.

XVIII. This facility is not subject to 15A NCAC 2Q .0508(g) "Prevention of Accidental Releases" because it does not store chemicals that are subject to this regulation in quantities great enough to cross the threshold limits.

XIX. Recommendations

This application modification issued under section 15A NCAC 2Q .0501(c)(1) for the Johnston County Landfill, located at 680 County Home Road, Smithfield, North Carolina, has been reviewed by the DAQ to determine compliance with all procedures and requirements. The Raleigh Regional Office made comments on the draft permit. The DAQ has determined that this facility is complying or will achieve compliance as specified in the permit with all applicable requirements. The Raleigh Regional Office concurs.

Issue permit No. 08844T06.