

NORTH CAROLINA DIVISION OF
AIR QUALITY
Application Review

Issue Date:

Region: Fayetteville Regional Office
County: Cumberland
NC Facility ID: 2600161
Inspector's Name: Jeffrey Cole
Date of Last Inspection: 11/29/2023
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Cumberland Co - Ann Street Landfill</p> <p>Facility Address: Cumberland Co - Ann Street Landfill 698 Ann Street Fayetteville, NC 28301</p> <p>SIC: 4953 / Refuse Systems NAICS: 562212 / Solid Waste Landfill</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 15A NCAC 02D .0516, 02D .0521, 02D .0524, 02D .1110, 02D .1111, 02D .1806 NSPS: Subpart XXX NESHAP: 40 CFR 61, Subpart M; 40 CFR 63, Subpart AAAA PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 2600161.21A Date Received: 06/09/2021 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08846/T10 Existing Permit Issue Date: 03/04/2020 Existing Permit Expiration Date: 12/31/2021</p>
<p>Micheal Renfrow Landfill Operations Manager (910) 322-1537 698 Ann St. Fayetteville, NC 28301</p>	<p>Amanda Lee PE, LEED AP/Director (910) 321-6920 698 Ann Street Fayetteville, NC 28301</p>	<p>Neal Cunnington Landfill Gas Technician (910) 322-0535 698 Ann St. Fayetteville, NC 28301</p>	

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2023	1.20	5.22	6.12	23.03	1.20	4.34	1.38 [Toluene]
2022	1.40	6.09	4.42	27.02	1.50	3.40	0.9920 [Toluene]
2021	0.5200	2.30	6.92	11.00	0.5700	4.48	1.57 [Toluene]
2020	0.8600	8.36	5.34	45.50	2.05	2.72	0.9304 [Hydrogen chloride (hydrochlori)]
2019	0.6900	6.68	5.26	36.37	1.64	2.51	0.7438 [Hydrogen chloride (hydrochlori)]

<p>Review Engineer: Massoud M. Eslambolchi</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p>Comments / Recommendations:</p> <p>Issue 08846/T11 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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1. Purpose of Application

The Cumberland County - Ann Street Landfill (Ann Street Landfill) is an active municipal solid waste (MSW) landfill located in Fayetteville, Cumberland County, North Carolina. Application No. 2600161.21A was received on June 09, 2021, and deemed complete for processing. The existing permit is set to expire on December 31, 2021. In accordance with General Condition K of the existing permit, Ann Street Landfill submitted this application in order to renew the Title V permit. Consistent with 15 A NCAC 02Q .0512(b), because the application for Title V permit renewal was received more than six months before the expiration of the existing permit, the existing permit will remain in effect, regardless of expiration date, until DAQ issues a response to this application for permit renewal.

This application will go through the required 30-day public notice and 45-day EPA review periods prior to issuance.

The facility contact for this application is Amanda Bader, Solid Waste Director, (phone: 910-321-6920). A consultant, SCS Engineers P.C. (SCS), was used for the preparation of this application. The contact at SCS is David Greene, Project Manager, (phone: 828-285-8951).

2. Facility Description

The Ann Street Landfill is owned and operated by Cumberland County and consists of a closed landfill (ID No. ES-1) and an active landfill (ID No. ES-3). ES-1 is further subdivided into two sections known as the “Flatland” and the “Bale Field.” In 2017 the landfill demonstrated that the Flatland area contributes less than 1% of the total Non-methane Organic Compounds (NMOC) emissions from the landfill and is considered as a nonproductive area that can be excluded from control.

The landfill operates under Solid Waste Permit No. 2601, and only accepts waste from Cumberland County. The landfill has a design capacity in excess of 2.5 million m³ and 2.5 million Mg, has demonstrated an NMOC emission rate in excess of 50 Mg/yr, and has been modified after July 17, 2014. Landfill gas (LFG) is collected by an installed gas collection and control system (ID No. CD-GCCS1) and is either routed to a gas treatment system (ID No. CD-GasTreatment), or to a candlestick-type flare (ID No. CD-2). Treated gas is sent to a local facility, Cargill, Inc. - Fayetteville (Facility ID 2600016), where it is combusted in the facility’s natural gas/LFG-fired boilers.

3. History/Background/Application Chronology

History/Background

03/04/2020 Renewed Title V Permit 08846T10 issued.

Application Chronology

06/09/2021 The Division of Air Quality (DAQ), Raleigh Central Office (RCO), received the permit application for Renewal, Application No. 2600161.21A. The application contained the required forms, and there was no request for confidentiality. No zoning determination was required.

06/09/2021 RCO sent the facility a letter acknowledging receipt of a complete permit application.

- 06/21/2021 Regional Office (FRO) completed P&O Review – Copy sent to RCO.
- 10/25/2024 Draft renewal approval documents submitted for Supervisory review/comment.
- 11/13/2024 Received Supervisor’s comments on Permit & Review documents.
- 11/15/2024 Draft approval documents and PFAS questionnaire sent to facility for review and comments.
- 11/26/2024 Draft documents sent to SSCB and Regional Office (FRO) for comments.
- 12/006/2024 Received minor comments from FRO and revised documents.
- xxxxxx 30-day public notice and 45-day EPA review periods begin.
- xxxxxx Public notice period ends.
- xxxxxx EPA review period ends.
- xxxxxx Air Quality Permit Revision No. 08846T11 issued.

4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the renewal process. This summary is not meant to be an exact accounting of each change but a summary of those changes:

The following changes were made to Air Permit No. 08846T10:*

Pages	Section	Description of Changes
--	Cover page and throughout permit	Updated all dates and permit revision numbers. Updated Responsible Official last name.
Pg. 3 of cover letter	Cover page	Added “Notice Regarding The Right To Contest A Division Of Air Quality Permit Decision” page.
Pg. 3 of cover letter	Summary of Changes to Permit Page	Added summary of changes made to the permit according to the most recent requirements of the renewed Title V permit.
Pg. 1 of Permit	Cover page of permit	Updated all dates, application numbers and permit revision numbers.
Pg. 2 of Permit	Table of Contents	<ul style="list-style-type: none"> • Added Section 3.0 as “Insignificant Activities List”. • Added Section 4.0 as “General Permit Conditions”.
Pg. 3 of Permit	Body of Permit	Added “List of Acronyms”.
Pg. 6	Section 2.1 A.3	Updated the NSPS XXX conditions with the regulatory revisions.
Pg. 17	Section 2.1 A.5	Updated MACT AAAA conditions with the regulatory revisions.
Pg. 29	Section 2.1 A.7	Added the condition for “Disclosure of Information Relating to Emissions of Fluorinated Chemicals”.
Pg. 30	Section 3	Moved Insignificant Activities List to Section 3.
Pg. 31	Section 4	Updated General Condition to most current (version 8.0, 7/10/2024) – Moved to New Section 4.

* This list is not intended to be a detailed record of every change made to the permit but a summary of those changes.

Moreover, the Title V Equipment Editor (TVEE) will be updated for consistency with the permit equipment listing.

The facility’s permitted emission sources are as follows:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1 NSPS XXX, MACT AAAA, 40 CFR 61 Subpart M	Municipal Solid Waste Landfill (closed portion)	CD-GCCS1	One landfill gas collection and control system
		CD-2	One landfill gas-fired candlestick-type flare (2,500 scfm gas flow rate)
ES-3 NSPS XXX, MACT AAAA, 40 CFR 61 Subpart M	Municipal Solid Waste Landfill (active portion)	CD-GasTreatment	One landfill gas treatment system that compresses landfill gas, filters it, and dewateres (refrigeration) it prior to offsite sale

The facility’s insignificant/exempt activities are as follows:

Emission Source ID No.	Emission Source Description
IES-1	Diesel fuel storage tank (8,000-gallon capacity)
IES-A1	Leachate pond (914,000-gallon capacity, 30,000 square feet of surface area)
IES-A2	Above ground used oil storage tank (1,000-gallon capacity)
IA-EG250 GACT ZZZZ	Emergency generator 250kW

5. Regulatory Review

The facility is subject to the following air quality regulations in addition to the General Conditions:

- 15A NCAC 02D .0516: Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 02D .0521: Control of Visible Emissions
- 15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart XXX
- 15A NCAC 02D .1110: National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart M
- 15A NCAC 02D .1111: Maximum Achievable Control Technology, 40 CFR 63, Subpart AAAA
- 15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions

15A NCAC 02D .0516: Sulfur Dioxide Emission from Combustion Sources

The landfill’s existing flare (ID No. CD-2) is subject to this requirement. This Renewal Permit does not change the existing requirement. SO₂ emissions from combustion sources are limited to 2.3 pounds per million Btu heat input. The emissions of SO₂ are well below this regulatory limit since the LFG characteristics are similar to natural gas and sulfur in LFG is negligible. No monitoring, recordkeeping or reporting is required for LFG combustion from this source. Continued compliance is expected.

15A NCAC 02D .0521: Control of Visible Emissions

The landfill's existing flare (ID No. CD-2) is subject to this requirement. Visible emissions are limited to a six-minute average opacity of 20%. Visible emissions from a properly maintained and operated flare are commonly not a concern. No monitoring, recordkeeping or reporting is required for LFG combustion in this source since combustion characteristics of LFG is similar to natural gas. Continued compliance is expected.

15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart XXX:

Construction commenced on the most recent expansion after July 17, 2014, triggering applicability of NSPS Subpart XXX. The facility is subject to the requirement to install and operate a GCCS, and has an existing system installed since the landfill was previously also required to operate a GCCS when it was subject to NSPS Subpart WWW.

The landfill submitted an updated design plan, which was approved by DAQ in 2019. The design plan included the following approved alternative procedures which will be included in the permit:

- ✓ Operate the collection and control system with a pressure at each well head of up to 5 inches of water column in areas that have a geomembrane or synthetic cover.
- ✓ When applicable, the Permittee may use an EPA approved on-site multi-gas analyzer, in lieu of a laboratory method, for determining the oxygen content of the landfill gas at each well and monitoring point.
- ✓ If the gas collection and control system does not contain any bypasses of the flare, the requirement to record flow of bypass of the flare is not applicable.
- ✓ The Permittee may use USEPA Method 3C or ASTM D3588 in place of Method 18 and ASTM D1946 to determine landfill gas components for calculating net heating value under 60.18(c)(3).

15A NCAC 02D .1110: National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart M:

The facility is an active disposal site for asbestos-containing wastes; therefore, it is subject to the requirements of this regulation. To comply, the facility must adhere to a general set of work practices which may include ensuring there are no visible emissions at the disposal site, covering waste daily with at least six inches of compacted non-asbestos material or use another dust suppression agent, or the landfill may propose alternative methods for DAQ approval. The facility will be required to post signage and barriers if the method of compliance does not include covering the asbestos-containing waste. Closed portions of the landfill which have previously received asbestos-containing waste are also subject and are required to comply with the requirements of 40 CFR 61.151 for inactive waste disposal sites. The facility's current Solid Waste permit contains a requirement for the facility to comply with the requirements of 40 CFR 61, Subpart M, and continued compliance is expected.

15A NCAC 02D .1111: Maximum Achievable Control Technology, 40 CFR 63, Subpart AAAA:

The MSW landfill (ID Nos. ES-01 and ES-03) is the subject source. Compliance with MACT Subpart AAAA is achieved by complying with the requirements of NSPS Subpart XXX. The condition has been updated to include the specific requirements of NSPS Subpart XXX since there are cross references between the two regulations. Continued compliance is expected.

15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

- a. 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. This is a state enforceable only requirement.

6. NSPS, NESHAP, PSD, 112(r), CAM & Attainment Status

NSPS –

- ✓ The MSW landfills (ID Nos. ES-1 and ES-3) are subject to 40 CFR 60, Subpart XXX “Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification after July 17, 2014” since the landfill increased the permitted design capacity and was “modified” after July 17, 2014.
- ✓ The MSW landfills (ID Nos. ES-1 and ES-3) are NOT subject to 40 CFR 60, Subpart WWW “Municipal Solid Waste Landfills” since NSPS Subpart WWW is superseded by Subpart XXX.

NESHAP –

- ✓ The MSW landfills (ID Nos. ES-1 and ES-3) are subject to 40 CFR 63, Subpart AAAA “Municipal Solid Waste Landfills” since the design capacity is greater than 2.5 million Mg and 2.5 million m³, and the NMOC emission rate exceeds 50 Mg/yr.
- ✓ The MSW landfills (ID Nos. ES-1 and ES-3) are subject to 40 CFR 61, Subpart M “Asbestos” since the landfill is an active disposal site for asbestos-containing waste.
- ✓ The Landfill is adding one emergency generator (250kW) to operate as an insignificant source (ID No. IA-EG 250. This EG is a diesel-fired engine and is subject to 40 CFR Subpart ZZZZ for an area source (GACT).

PSD –

This facility is a minor source and not subject to PSD, because both actual emissions and the potential emissions of each regulated NSR (New Source Review) pollutants are below the 250 ton per year major source threshold.

- ✓ Cumberland County has triggered increment tracking under PSD for PM₁₀, SO₂. However, this permit renewal does not consume or expand increments for any pollutants.

112(r) –

The facility does not store any of the listed 112(r) chemicals in amounts that exceed the threshold quantities. Therefore, the facility is not required to maintain a written Risk Management Plan (RMP).

CAM –

NC's SIP (State Implementation Plan) approved CAM (Compliance Assurance Monitoring) rule (15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU), located at a facility required to obtain a Title V permit if it meets all of the following criteria:

- It is subject to an emission limitation or standard, and
- It uses an (active) control device to achieve compliance, and
- It has potential pre-control emissions that equal or exceed the major source threshold (i.e., either 100 tons per year (tpy) for criteria pollutants, 10 tpy of any individual HAP, or 25 tpy of any combination of HAP).

The following emission limitations or standards are exempted from the CAM rule:

- NSPS or NESHAP standards proposed after November 15, 1990;
- Stratospheric ozone protection requirements under Title VI of the Clean Air Act
- Acid rain program requirements;
- Emission limitations or standards or other requirements that apply solely under an approved emissions trading program approved pursuant to of Subchapters 02D and 02Q of Chapter 15A and incorporated in a permit issued under 15A NCAC 02Q .0500;
- An emissions cap that is approved pursuant to Subchapters 02D and 02Q of Chapter 15A and incorporated in a permit issued under 15A NCAC 02Q .0500;
- Emission limitations or standards for which a permit issued under 15A NCAC 02Q .0500 specifies a continuous compliance determination method, as defined in 40 CFR 64.1— unless the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device; and
- Certain municipally owned utility units, as defined in 40 CFR 72.2.

Please note that the emission unit is not exempted from the CAM rule if nonexempt emission limitations or standards (e.g., a state rule or an older NSPS emission limits) apply to the emissions unit.

Regarding the Ann Street Landfill, the landfill closed and active portions (PSEUs, ES-1 and ES-3 respectively) emissions' (NMOC and HAPs) are controlled by active control devices (GCCS and open flare), but these PSEUs are subject to NSPS XXX and MACT AAAA (both post- November 1990 regulations); thus, these units (ES-1 and ES-3) are exempt from CAM rule. No other rules apply to these sources for control of NMOC and HAPs, and these control devices are not installed to control emissions of any other pollutants (other than NMOCs and HAPs)..

Attainment status – Cumberland County is in attainment for all criteria pollutants.

7. Other Regulatory Requirements

- A Zoning Consistency Determination is NOT required for this permit application.
- A P.E. Seal is NOT required for this permit application.

- General Condition J (affirmative defense provision) is removed from the Permit consistent with the most recent update to Section 4 General Conditions (version 8.0 7/10/2024). The rationale for such removal is as follows:

EPA has promulgated a rule (88 FR 47029, July 21, 2023), with an effective date of August 21, 2023, removing the emergency affirmative defense provisions in operating permits programs, codified in both 40 CFR 70.6(g) and 71.6(g). EPA has concluded that these provisions are inconsistent with the EPA's current interpretation of the enforcement structure of the CAA, in light of prior court decisions¹. Moreover, per EPA, the removal of these provisions is also consistent with other recent EPA actions involving affirmative defenses² and will harmonize the EPA's treatment of affirmative defenses across different CAA programs.

As a consequence of this EPA action to remove these provisions from 40 CFR 70.6(g), it will be necessary for states and local agencies that have adopted similar affirmative defense provisions in their Part 70 operating permit programs to revise their Part 70 programs (regulations) to remove these provisions. In addition, individual operating permits that contain Title V affirmative defenses based on 40 CFR 70.6(g) or similar state regulations will need to be revised.

Regarding NCDAQ, it has not adopted these discretionary affirmative defense provisions in its Title V regulations (15A NCAC 02Q .0500). Instead, DAQ has chosen to include them directly in individual Title V permits as General Condition (GC) J.

Per EPA, DAQ is required to promptly remove such impermissible provisions, as stated above, from individual Title V permits, after August 21, 2023, through normal course of permit issuance.

- A disclosure for PFAS releases from landfills has been included in permit approval document pursuant to 15A NCAC 02Q .0308(a)(1) and **02Q .0309(b)**. DAQ received the facility's completed PFAS questionnaire on 12/22/2024 – A copy is attached to this document.

8. Air Toxics

The landfill facility made a toxics demonstration when the 2,500 scfm flare (ID No. CD-2) was permitted in 2019. Dispersion modeling was conducted for pollutants that exceeded their respective TPERs from 02Q .0711(a), and the modeled emission rates were based on the maximum emission rate for the flare, and on volume emissions projected from the landfill. Since the landfill is subject to NESHAP and MACT regulations, it is exempt from permitting for State toxics pursuant to 15A NCAC 02Q .0702(a)(27); thus, the permit does not contain 02D .1100 or 02Q .0711 toxics conditions.

The following impacts resulted from that demonstration:

¹ NRDC v. EPA, 749 F.3d 1055 (D.C. Cir. 2014).

² In newly issued and revised New Source Performance Standards (NSPS), emission guidelines for existing sources, and NESHAP regulations, the EPA has either omitted new affirmative defense provisions or removed existing affirmative defense provisions. See, e.g., National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants; Final Rule, 80 FR 44771 (July 27, 2015); National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Final Rule, 80 FR 72789 (November 20, 2015); Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration Units; Final Rule, 81 FR 40956 (June 23, 2016).

Toxic Air Pollutant	Averaging Period	Modeled Emission Rates		Concentration at Property Boundary ($\mu\text{g}/\text{m}^3$)	AAL ($\mu\text{g}/\text{m}^3$)	% AAL
		Landfill	Flare			
Acrylonitrile	lb/day	0.56	9.24×10^{-3}	0.60	30	2.0%
	lb/hr	0.023	3.85×10^{-4}	2.86	1000	0.3%
Benzene	lb/yr	90.75	1.50	0.043	0.12	35.8%
Hydrogen chloride	lb/hr	-----	0.587	0.89	700	0.2%
Hydrogen sulfide	lb/day	11.36	0.19	12.32	120	10.3%
Vinyl chloride	lb/yr	279.04	30.71	0.14	0.38	36.2%

This renewal application does not propose an increase in any of the above pollutants. Therefore, it is anticipated that the toxic air pollutants from this renewal approval will not pose a risk to human health as a result.

9. Emissions Review

Pollutant	Potential Before Controls Emissions (tpy)	Potential After Controls Emissions (tpy)
PM (TSP)	5.57	5.57
PM ₁₀	5.57	5.57
PM _{2.5}	5.57	5.57
SO ₂	21.00	21.00
NO _x	22.61	22.61
CO	103.06	103.06
VOC	22.726.35	6.35

The facility’s actual emissions as reported on the annual AQEI can be seen in the table on page one of this document.

10. Statement of Compliance

The latest compliance inspection was conducted by FRO (DAQ), on November 29, 2023. The facility was found to be operating in compliance at the time.

11. Public Notice Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. It is emphasized that by policy, DAQ does not determine “affected state” for each application requiring compliance with 02Q .0522, and it simply provides to all neighboring states (VA, TN, SC,

GA) and all local programs in each of those states and NC, a copy of public notice, draft permit, and statement of basis, for review and comment, as a customer service.

The 30-day public notice period was from XXX, 2024 through XXX, 2024.

The EPA 45-day review period was from XXXX, 2024 through XXXX, 2024.

12. Comments and Recommendations

This TV Renewal application for the Cumberland Co – Ann Street Landfill located in Fayetteville, Cumberland County, NC has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 08846T11.

Attachment to TV Application
Cumberland County – Ann Street Landfill
Facility ID: (2600161)

Questionnaire for Landfill facilities with potential PFAS releases

- a. In response to the growing concern about PFAS, NC DAQ has developed a list of screening questions for Permittees to help us identify potential air emission sources of emerging contaminants which are listed below.**

DAQ Question 1:

Will your facility use any material or products in your operations that contain fluorinated chemicals? If so, please identify such materials or products and the fluorinated chemicals they contain.

Answer 1:

Not to our knowledge

DAQ Question 2:

Will your facility formulate/create products or byproducts (directly or indirectly) that contain fluorinated chemicals (across multiple media)? If so, please identify such products or byproducts and the fluorinated chemicals they contain.

Answer 2:

The Ann Street Landfill does not create or formulate products or byproducts

DAQ Question 3:

Will your facility generate solid, liquid, or gaseous related emissions, discharges, or wastes/products containing fluorinated chemicals? If so, please identify such waste streams or materials and the fluorinated chemicals they contain.

Answer 3:

Fluorinated chemicals are present in many different household items from cosmetics to food packaging to clothing that are disposed in landfills. Fluorinated chemicals have been found to varying degrees in leachate at landfills across the country. The Ann Street Landfill has identified PFAS in the leachate from the landfill unit. Leachate samples indicate detectable concentrations of PFAs constituents analyzed by EPA method 1633. There are studies being conducted that suggest fluorinated chemicals may be found in air emissions from landfills as well. The Ann Street Landfill has not measured or detected fluorinated chemicals in air emissions to date.

DAQ Question 4:

Do your facility's processes or operations use equipment, material, or components that contain fluorinated chemicals (e.g., surface coating, clean room applications, solvents, lubricants, fittings, tubing, processing tools, packaging, facility infrastructure, air pollution control units)? Could these processes or operations directly or indirectly (e.g., through leaching, chemical process, heat treatment, pressurization, etc.) result in the release of fluorinated chemicals into the environment?

Answer 4: Not to our knowledge.

DAQ Question 5:

List the fluorinated chemicals identified (i.e., through testing or desktop review) above in your response under the appropriate methods/approaches? If one is not, are they on any other known US or International target lists? OTM-45 (air emissions) Methods 533 & 537.1 (drinking water) SW-846: Method 8327 (water) Draft Method 1633 (water, solids, tissue) Total PFAS” Draft Method 1621 for Adsorbable Organic Fluorine (wastewater) Non targeted analytical methods Qualitative approach through suspect screening.

Answer 5:

Leachate samples analyzed by EPA method 1633 have identified detectable quantities of the following constituents:

2H,2H,3H,3H-Perfluorooctanoic acid (5:3FTCA)
3-Perfluoroheptyl propanoic acid (7:3FTCA)
Perfluorobutanoic Acid (PFBA)
Perfluoropentanoic Acid (PFPeA)
Perfluorohexanoic Acid (PFHxA)
Perfluoroheptanoic Acid (PFHpA)
Perfluorooctanoic acid (PFOA)
Perfluorononanoic Acid (PFNA)
Perfluorodecanoic Acid (PFDA)
Perfluoroundecanoic Acid (PFUnA)
Perfluorododecanoic Acid (PFDoA)
Perfluorobutane Sulfonic Acid (PFBS)
Perfluoropentane sulfonic acid (PFPeS)
Perfluorohexane Sulfonic Acid (PFHxS)
Perfluoroheptane sulfonic acid (PFHpS)
Perfluorooctanesulfonic acid (PFOS)
6:2 Fluorotelomer sulfonate (6:2 FTS)
1H,1H,2H,2H-perfluorodecanesulfonate (8:2 FTS)
Perfluorooctane Sulfonamide (PFOSA)
2-(N-ethyl perfluoro-1-octanesulfonamido)-ethanol (NeTFOSE)
N-methyl perfluorooctane sulfonamidoacetic acid (N-MeFOSAA)
N-ethyl perfluorooctane sulfonamidoacetic acid (NEtFOSAA)
Perfluoro-2-methyl-3-oxahexanoic acid (GenX)

DAQ Question 6:

Are there other facilities or operations in the U.S. or internationally engaged in the same or similar activities involving fluorinated chemicals addressed in your response to the above questions? If so, please provide facility identification information? In addition, are there any ISO (International Organization for Standardization) certification requirements?

Answer 6: Identifying and managing fluorinated “forever” chemicals at landfills is an industry-wide, world-wide, issue.

DAQ Question 7:

Do you plan to store AFFF on site, use it in fire training at the site, use it for fighting fires at the facility, or include it in a fire fighting system at the site?

Answer 7: No.

DAQ Question 8:

Are other emerging contaminants (e.g., 1,4-dioxane, brome, perchlorate, 1,2,3-Trichloropropane) used in some capacity within your facility or operations?

Answer 8: No.

DAQ Question 9:

Do you need technical assistance to answer the questions above.

Answer 9: No

b. The following State-enforceable only condition will be placed in the Title V permit:

- Disclosure of Information Relating to Emissions of Fluorinated Chemicals:

The Permittee shall have an ongoing duty to disclose the known presence of materials containing fluorinated chemicals at the Facility that have the potential to result in the emission of fluorinated chemicals to the environment. Such disclosures shall be in writing and submitted to the Regional Office Supervisor within thirty days of the Permittee becoming aware of such information unless such information has already been disclosed to DAQ by the Permittee.