NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date: xxxx, xx 2023

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4101086
Inspector's Name: Robert Barker
Date of Last Inspection: 03/10/2022
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): City of Greensboro - White Street Landfill

Facility Address:
City of Greensboro - White Street Landfill
2503 White Street
Greensboro, NC 27405

SIC: 4953 / Refuse Systems
NAICS: 562212 / Solid Waste Landfill

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 02D .0516, .0521, .0524, .1111, .1806
NSPS:
NESHAP: Subpart AAAA and CCCCCC
PSD: N/A
PSD Avoidance: N/A
NC Toxics: N/A
112(r): N/A
Other: 40 CFR 62, Subpart OOO

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Michael Szychowicz Landfill Specialist (336) 373-7659 2503 White Street Greensboro, NC 27405	Julio Delgado Director of Field Operations (336) 373-2783 401 Patton Avenue Greensboro, NC 27406	Lewis Walker Landfill Compliance Coordinator (336) 373-7662 2503 White Street Greensboro, NC 27405

Application Data

Application Number: 4101086.21A
Date Received: 12/08/2021
Application Type: Modification
Application Schedule: TV-Reopen for Cause

Existing Permit Data
Existing Permit Number: 08830/T09
Existing Permit Issue Date: 10/15/2019
Existing Permit Expiration Date: 09/30/2024

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	0.8700	7.76	3.62	35.39	2.16	1.92	0.8815 [Hydrogen chloride (hydrochlori]
2020	0.6400	6.24	3.67	28.43	1.79	1.77	0.7082 [Hydrogen chloride (hydrochlori]
2019	1.03	10.03	3.94	45.71	2.62	2.23	1.14 [Hydrogen chloride (hydrochlori]
2018	1.51	14.66	4.09	66.83	3.88	2.80	1.66 [Hydrogen chloride (hydrochlori]
2017	1.33	12.87	4.19	58.69	3.38	2.62	1.46 [Hydrogen chloride (hydrochlori]

Review Engineer: Massoud M. Eslambolchi

Review Engineer's Signature: **Date:** xx/xx/2023

Comments / Recommendations:
Issue 08830/T10
Permit Issue Date: xx/xx/2023
Permit Expiration Date: 09/30/2024

1. Purpose of Application

The City of Greensboro – White Street Landfill is an active Municipal Solid Waste (MSW) landfill located in Greensboro, Guilford County. The landfill has submitted application 4101086.21A in accordance with 15A NCAC 02D .0517 "Reopen For Cause" in order to replace the existing MACT AAAA conditions in the Title V permit to include the changes in the February 14, 2022 Federal Register, Volume 87, Issue 30 for this Subpart. Also, because the North Carolina Rules (15A NCAC 02D .1700) for existing landfills have not yet been approved in the State Implementation plan by the US EPA, the Federal regulations for existing landfills as codified in 40 CFR 62, Subpart OOO will be placed into the permit to replace the previous 40 CFR Subpart WWW regulations.

This application also incorporates the addition of an insignificant source activity (IES-9) which was submitted on Nov. 20, 2019, to the Regional Office as a minor modification 502(b)(10) to the existing Permit 8830T08.

In the February 14, 2022 Federal Register, the U.S. Environmental Protection Agency (EPA) finalized technical revisions and clarifications for the National Standards for Hazard Air Pollutants (NESHAP, Subpart AAAA) for MSW Landfills established in the March 26, 2020, final rule.

- This final rule also amended the MSW Landfill's NSPS regulations in 40 CFR Part 60, Subpart XXX, to clarify and align the timing of compliance for certain requirements involving the installation of a gas collection and control systems (GCCS) under related MSW landfill rules.
- Additionally, the EPA revised the definition of Administrator in the MSW Landfills Federal Plan that was promulgated on May 21, 2021 to clarify who has the authority to implement and enforce the applicable requirements. The final rule was effective February 14, 2022.

2. Facility Description

The City of Greensboro – White Street Landfill is an active MSW landfill consisting of three units: Phase I which is an unlined unit that closed in 1978, Phase II (ID No. ES-2) which is an unlined unit that closed in 1998, and Phase III which is a Subtitle-D lined unit. Phase III ceased accepting MSW in 2006. The landfill still accepts yard waste and C&D waste, which are placed on top of the closed Phase II unit, and also accepts sewage sludge and incineration ash, which are placed in Phase III. MSW is currently processed through the City of Greensboro Transfer Station, and MSW will only be sent to the White Street Landfill in the event that the transfer station is unable to be used and other disposal options have been exhausted.

The landfill has a design capacity greater than 2.5 million Mg and 2.5 million m^3, and also has demonstrated that NMOC emissions exceed 50 Mg/yr. As such the permitted landfill is currently subject to NSPS Subpart WWW, and MACT Subpart AAAA, and is required to operate a gas collection and control system (GCCS). The collected landfill gas (LFG) is routed to two LFG-fired flares (ID Nos. CD-1 and CD-3). CD-1 serves to control the gas generated by the non-active landfill Phases I and II, and CD-3 serves to control the gas generated by the active Phase III landfill. The landfill has also operated a treatment system (ID No. CD-Treatment) in the past and routed treated LFG off-site to Cone Mills (Facility ID 0100162), however Cone Mills has permanently closed, so all of the generated gas is flared in CD-1 and CD-3. The landfill has not requested to remove the treatment system as a permitted control device.

3. Application Chronology

10/10/2021	The North Carolina Division of Air Quality sent a Reopen for Cause letter to the facility.
12//08/2021	Application No. 4101086.21A was created by DAQ.
03/XX/2023	Pre-Draft for supervisory review.
03/XX/2023	Draft permit and review sent to Regional Office (Robert Barker). ____comments were received…..
03/XX/2023	Draft permit and review sent to Stationary Compliance (Samir). ____comments were received…..
03/XX/2023	Draft permit and review sent to Public Notice.
03/XX/2023	Draft permit sent to the Applicant.
XX/XX/XX	Posting for Public comment and EPA review starts.
XX/XX/XXXX	30-Day Public comment period ends.
XX/XX/XXXX	45-Day EPA Review ends.
XX/XX/XXXX	Air Quality Permit No. 08830T10 issued.

4. Table of Changes to Existing Permit No. 08830T09

Old Page No. Existing permit	New Permit Section	Description of Changes
Page 1	Cover letter	● Updated letterhead and permit using new permit shell ● Updated permit revision numbers and dates throughout
Page 2	Cover letter	● Revised PSD increment tracking statement. Updated facility contact information
Page 3	Cover letter	● Added page containing "Notice Regarding The Right to Contest A Division Of Air Quality Permit"
Page 4	Cover letter	● Revised the Summary of Changes to the Permit page
1st Page of Permit	1st Page of Permit	● Changed number, changed "Replaces Permit" number ● Changed effective date and issue date of the Permit ● Revised the application number and complete application date
Page 3	List of Acronyms	● Added list to the front of the permit
--------	Section 2.1	● Removed NSPS WWW citation for NMOC row and replaced with Federal regulations for existing landfills pursuant to 40 CFR 40 CFR 62, Subpart OOO
--------	Section 2.1	● Removed NSPS Subpart WWW applicability from table of regulated pollutants ● Added 40 CFR 62 Subpart OOO to permit for existing municipal solid waste landfills
Page 5	Section 2.1 A.3 Pages 5-18	● Updated MACT AAAA requirements
Page 18	Section 2.1 A. Page 18-45	● Added 40 CFR 62, Subpart OOO requirements for existing municipal solid waste landfills
Page 45	Section 3 Page 46	● Added new Section 3 for Insignificant Activities – Updated by adding IES-9 emergency generator to the list.
Pages 46	Section 4 Pages 47-55	● Added new Section 4 for General Conditions (version 6.0, 01/07/2022)

5. Changes in Equipment

There is an addition of an insignificant source IES-9 (Emergency Generator) being made to the facility's insignificant/exempt activities.

The facility's currently permitted emission sources are as follows (in 08830T09):

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1 **MACT AAAA**	Non-active (unlined) portion of landfill	GCCS-1	One landfill gas collection and control system
		CD-1	One candle stick-type flare (2800 scfm design flow rate)
ES-2 **MACT AAAA**	Non-active (unlined) portion of landfill	CD-Treatment	Landfill gas treatment system (filtration, compression, and dewatering via refrigeration)

ES-3 **MACT AAAA**	Active portion of landfill (lined)	GCCS-2	One landfill gas collection and control system
		CD-3	One candle stick-type flare (1500 scfm design flow rate)
		CD-Treatment	Landfill gas treatment system (filtration, compression, and dewatering via refrigeration)

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

Emission Source ID No.	Emission Source Description[a,b]
IES-5	Leachate management system
IES-7	One 20,000 gallon Diesel fuel underground storage tank
IES-8 **GACT CCCCCC**	One 10,000 gallon unleaded gasoline underground storage tank
IES-8E	Diesel fuel-fired wood grinder (portable non road engine, 1050 hp)
IES-9 **NSPS JJJJ** **GACT ZZZZ**	One natural gas fired emergency generator (70 kW)

a. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement (Federal or State) or that the Permittee is exempted from demonstrating compliance with any applicable requirement.
b. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."

6. 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 JJJJ
- 15A NCAC 02D .1111: Maximum Achievable Control Technology, 40 CFR 63, Subparts AAAA and ZZZZ
- 15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions
- 40 CFR Subpart OOO: Federal Requirements for Municipal Solid Waste Landfills

The following permit condition is being removed from the permit because it no longer applies.

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

15A NCAC 02D .0516: Sulfur Dioxide Emissions from Combustion Sources:
Sulfur dioxide emissions from the facility's combustion sources shall be no more than 2.3 pounds per million Btu heat input. For LFG combustion in the flares (ID Nos. CD-1 and CD-3), using AP-42 Chapter 2.4, Equations 3, 4, and 7, the SO_2 emission rate is determined to be 0.030 pounds per million Btu at both flares total maximum capacity of 130.55 million Btu per hour, 4300 scfm and assuming a heat value of 506 Btu per ft^3 of LFG combusted (see calculation below). This estimated value (0.030 pounds per million Btu) is below the sulfur dioxide threshold. Continued compliance is indicated.

To calculate potential SO_2 emissions, AP-42 Chapter 2.4 was used along with information submitted by the facility:

- Total design rating for both flares (2800 scfm + 1500 scfm) = 4,300 ft^3/minute (or 121.76 m^3/min = 7,305.7 m^3/hour)
- Methane is only 50% of this gas stream (3,652.85 m^3/hour)
- Q_S = Emission rate of reduced sulfur compounds, m^3/hour
- C_S = Concentration of reduced sulfur compounds (100 ppmv, as H_2S assumed by facility)
- Multiplication factor for 50% methane concentration in landfill gas = 2.0
- Molecular weight of H_2S = 34.08 g/mole
- Molecular weight of sulfur = 32.06 g/mole

$$Q_{H_2S} = 2.0 \times Q_{CH_4} \times \left(\frac{C_S}{1\times10^6}\right) \text{ (AP-42, Equation 3)}$$

$$Q_{H_2S} = 2.0 \times 3{,}652.85 \frac{m^3}{hour} \times \left(\frac{100 \text{ parts}}{1\times10^6}\right) = 0.731 \frac{m^3}{hour}$$

Conversion of H_2S flow rate to flow rate of sulfur only:

$$Q_s = Q_{H_2S} \times \frac{MW_S}{MW_{H_2S}} = 0.731 \frac{m^3 H_2S}{hour} \times \frac{32.06 \text{ g S/mole}}{34.08 \text{ g } H_2S/\text{mole}} = 0.687 \frac{m^3 S}{hour}$$

The mass of the pre-combustion sulfur present in the methane was found using Equation 4 of AP-42, Section 2.4.4.2.:

$$UM_s = 0.687 \frac{m^3}{hour} \times \left[\frac{32.06 \text{ g/gmol} \times 1 \text{ atm}}{8.205 \times 10^{-5} \frac{m^3 - atm}{gmol - K} \times 1000 \frac{g}{kg} \times (273 + 25°C)\text{ K}}\right] \times 2.2 \frac{pounds}{kg}$$

$$UM_s = 1.98 \frac{pounds}{hour}$$

To calculate SO_2 emitted from the combustion of sulfur, Equation 10 of Section 2.4-8 was used.

$$SO_2 \text{ emitted} = UM_s \times \frac{\eta_{col}}{100} \times 2.0$$

Where:
UM_{cl} = Uncontrolled mass emission rate of sulfur compounds (2.11 lb sulfur/hour)
η_{col} = Collection efficiency of the landfill gas collection system, percent (assumed 100% by facility)
2.0 = Ratio of the molecular weight of SO_2 to the molecular weight of Sulfur

$$SO_2 \text{ emitted} = 1.98 \frac{lb}{hour} \times \frac{100}{100} \times 2.0 \times \frac{8760 \text{ hours}}{year} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 17.34 \frac{\text{tons } SO_2}{year}$$

$$\text{Emission Rate } SO_2 = \frac{17.34 \text{ tons } SO_2}{year} \times \frac{2000 \text{ lbs } SO_2}{1 \text{ ton } SO_2} \times \frac{1 \text{ year}}{8760 \text{ hours}} \times \frac{hour}{130.55 \text{ million Btu}} = \frac{0.030 \text{ lbs } SO_2}{\text{million Btu}}$$

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

Visible emissions from the facility's LFG-fired utility flares (ID Nos. CD-1 and CD-3) shall not exceed 20% opacity when averaged over a six-minute period. Properly maintained and operated flares typically have no trouble meeting this requirement. Continued compliance is expected.

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

The City of Greensboro White Street Landfill (ID No. ES-1, ES-2, and ES-3) are subject to this Subpart because:

- this municipal solid waste landfill accepted waste since November 8, 1987, or has additional capacity for waste deposition, and
- this landfill is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m 3) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to 40 CFR 63.1959.

The MACT AAAA regulations contain the updated operational standards, compliance provisions, and monitoring requirements of 40 CFR 63.1958, 63.1960, and 63.1961, as well as the recordkeeping and reporting requirements of MACT AAAA. These conditions also include requirements for enhanced monitoring of elevated temperature wells. The landfill is required to continue wellhead monitoring and surface emissions monitoring, as well as continue to keep records and make periodic reports, some of which are required to be submitted electronically via EPA's electronic reporting tool in CDX.

For reports previously submitted, the Permittee is required to submit a statement with the first semi-annual report certifying that the listed reports were previously submitted to include the dates of submittal. As part of the updated requirements, the landfill will be required to develop a site-specific treatment monitoring plan for a LFG treatment system if it begins the sale of landfill gas for beneficial use.

40 CFR 62 Subpart OOO: Federal Requirements for Municipal Solid Waste Landfills

The City of Greensboro White Street landfill (ID No. ES-1, ES2, and ES-3) are classified as an existing MSW landfill because the landfill has accepted waste after November 8, 1987, was constructed before July 17, 2014 and has not been modified after this date. Existing landfills are subject to Emission Guidelines Subpart Cf, as codified in the North Carolina rule 15A NCAC 02D .1700 if these rules have been approved by the US EPA. Since the State Implementation Plan for North Carolina rules for existing landfills (15A NCAC 02D .1700) has not yet been approved, the permit conditions for NSPS WWW written in the existing permit will be removed and replaced with the Federal rules in accordance with 40 CFR 62, Subpart OOO. This landfill is required to install and operate a GCCS, and to route the collected gas to a control device/system. Compliance is expected.

15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions

This is a "State-enforceable Only" requirement that applies facility wide. 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. According to the most recent inspection report dated 03/10/2022, no odors were protected beyond the property boundary at the time of inspection. Compliance is indicated.

7. NSPS, Federal Regulations, NESHAP, PSD, 112(r), CAM & Attainment Status

NSPS-

- ✓ The MSW landfill (ID No. ES-1, ES-2, and ES-3) are not subject to 40 CFR 60, Subpart WWW "Municipal Solid Waste Landfills" since the facility is now considered an existing source under 40 CFR Subpart Cf "Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills" because the landfill has accepted waste after November 8, 1987 and was constructed prior to July 17, 2014.

- ✓ The diesel-fired wood grinder (ID No. IES-8E) is NOT subject to 40 CFR 60, Subpart IIII "Stationary Compression Ignition Internal Combustion Engines" because it is not a stationary source.

- ✓ The emergency generator (ID No. IES-9) is subject to 40 CFR 60, Subpart JJJJ, "Stationary Spark Ignition Internal Combustion Engines," since the engine is a spark ignition emergency engine that was manufactured after January 1, 2009. This source will be placed on the Insignificant Activities List.

40 CFR 62, Subpart OOO – Federal Regulations for Municipal Solid Waste Landfills:

This facility is subject to the Part 70 Title V program because the design capacity of the landfill is greater than or equal to 2.5 million megagrams and 2.5 million cubic meters. This landfill is considered an "existing" landfill because it has accepted waste since November 8, 1987 and the landfill commenced construction, reconstruction, or modification on or before July 17, 2014. This existing landfill would be subject to the State Rules for North Carolina (as codified under 15A NCAC 02D .1700) for existing landfills if the rules have been approved by the US EPA.

However, since the State Implementation Plan for North Carolina landfill rules for existing landfills has not yet been approved, the Federal rules pursuant to 40 CFR 62, Subpart OOO will apply until the rules in 15A NCAC 02D .1700 have been approved. Physical or operational changes made to an existing MSW landfill solely to comply with an emission standard under this Section are not considered a modification or a re-construction of the landfill, and do not subject an existing MSW landfill to the requirements of 40 CFR 60, Subpart XXX.

NESHAP

- ✓ The diesel-fired wood grinder (ID No. IES-8E) is not subject to 40 CFR 63, Subpart ZZZZ "Reciprocating Internal Combustion Engines" because it is not a stationary source. This source will be listed on the Insignificant Activities List.
- ✓ The natural gas-fired emergency generator (IES-9) is subject to Subpart ZZZZ.
- ✓ The MSW landfills (ID Nos. ES-1, ES-2, and ES-3) are subject to 40 CFR 63, Subpart AAAA "Municipal Solid Waste Landfills" since the facility has accepted waste since November 8, 1987, has a design capacity greater than 2.5 million Mg and 2.5 million m^3, and has had an annual NMOC emission rate greater than 50 Mg/yr.
- ✓ The gasoline storage tank (ID No. IES-8) is subject to 40 CFR 63, Subpart CCCCCC "Gasoline Dispensing Facilities" since the facility is an area source of HAPs, and the facility meets the definition of a gasoline dispensing facility as any stationary facility which dispenses gasoline into the tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. Gasoline storage tanks are listed as affected sources under §63.11111(a), and there are no size distinctions.

  Since IES-8 is an insignificant activity, there is no permit condition, however the facility is still required to comply with Subpart CCCCCC. The facility has the general duty to minimize emissions by operating and maintaining affected sources, and their associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution practices for minimizing emissions. In addition, since the facility's throughput is expected to be less than 10,000 gallons per month based on throughput reported on the facility's annual AQEI, the facility is subject to the requirements of §63.11116. This section states that the facility must handle the gasoline in a manner which will not result in vapor release to the atmosphere for an extended period of time. Measures to be taken include, but are not limited to:

  - Minimize gasoline spills;
  - Clean up spills as expeditiously as practicable;
  - Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
  - Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices.

  There are no notification or reporting requirements for facilities with a throughput of less than 10,000 gallons per month, however, the facility shall supply records of gasoline throughput within 24 hours of a request by DAQ. Additionally, should the facility's monthly gasoline throughput exceed 10,000 gallons, the facility will be subject to the requirements of §63.11117 for facilities with a monthly throughput of 10,000 gallons of gasoline or more, or §63.11118 for facilities with a monthly throughput of 100,000 gallons of gasoline or more, whichever is applicable, and must meet the

applicable notification, testing, monitoring, recordkeeping, and reporting requirements. If an affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable source threshold. [§63.11111(i)]

- **PSD –** PSD is not impacted by this application.

  ✓ Guilford County has triggered increment tracking under PSD for PM_{10} and SO_2. This permitting action is neither expected to consume nor expand any increments.

- **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 –** CAM does not apply since this source is regulated by both NSPS and MACT regulations that were promulgated after 1990 and control the pollutants that would be subject to CAM.

- **Attainment status** – Guilford County is in attainment for all criteria pollutants.

8. 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.
- There are no permit application fees required for this permit application.

9. Compliance Status

DAQ has reviewed the compliance status of this facility. During the most recent inspection report dated March 10, 2022 by the Regional Office (WRO), the facility appeared to be in compliance with their current permit.

10. Public Notice/EPA and Affected State(s) 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.

- Public notice from XXXXX, 2023 through XXXXX, 2023. ____comment were received……

- EPA 45 day review from XXXX, 2023 through XXXXX, 2023. …….comments were received….

11. Other Regulatory Requirements

- A Zoning Consistency Determination is NOT required for this permit application.
- No application fees were required for this Re-open For Cause application.

12. Comments and Recommendations

This Reopen for Cause Permit modification for the City of Greensboro – White Street Landfill located in Greensboro, Guilford 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. 08830T10.