

Air Quality Bureau Landfill Meeting

September 27, 2010

IowaDNR

The Iowa Department of Natural Resources



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Landfill Meeting

- Welcome and opening remarks
- Review agenda
- Speaker introductions
- Purpose of today's meeting
 - Define “landfill design capacity” for air quality purposes (used to determine some air quality requirements)
 - Provide an overview of the air quality regulations that may apply to your facility and how to determine applicability
 - Ensure landfills have the knowledge and tools needed to comply with all air quality regulations

Landfill Meeting

- Recent Air Quality Bureau compliance assistance efforts
 - Presentation at an ISOSWO conference in March 2010
 - Follow up letter sent to landfills in June 2010 requesting information for applicability determinations
 - Letter generated a lot of questions regarding landfill design capacity and the requirement for an air quality construction permit
 - Additional letter sent in August 2010 asking landfills to wait on the information request until design capacity could be defined for air quality purposes

Landfill Design Capacity

- Design capacity has not always been used or defined consistently in all regulatory program areas
 - Difficult to use other sources of information for applicability to specific federal air regulations
- Landfill Design Capacity for air quality purposes
 - Maximum amount of waste a landfill can ultimately accept and includes waste already in place (million Mg and million cubic meters)
 - Used to determine requirements for some of the air quality regulations, i.e. New Source Performance Standards (NSPS)

Landfill Design Capacity Cont.

- Plan for establishing design capacity in an air quality construction permit for your landfill
 - A construction permit for the landfill is already required by Iowa Administrative Code
 - The design capacity would be applied consistently for all landfills for air quality purposes
 - Also provides flexibility since design capacity could be limited in an air quality construction permit for any length of time

Landfill Design Capacity Cont.

- Design capacity limits in air quality construction permits
 - A limit on design capacity could be taken to avoid/delay becoming subject to some air quality requirements
 - A limit could only be taken on capacity that has **not** been constructed
 - A design capacity limit could be increased when a landfill needs additional capacity

Questions

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Landfill Meeting Summary

- Next Steps
 - Determine level of assistance needed and complete survey form
 - Determine what air quality regulations apply to your facility and take appropriate steps to comply
 - Apply for air quality permits

Landfill Meeting Summary

- Air Quality Construction Permits
 - Submit air quality construction permit applications by January 1, 2011
 - Include design capacity and any requested design capacity limit in application for the landfill

Landfill Meeting Summary

- If become subject to Title V Operating Permit
 - Application is due 12 months after becoming a new major source, i.e. 100 tpy or more of a regulated pollutant
 - If design capacity is $>$ or $=$ to 2.5 million MG and 2.5 million cubic meters, as stated in NSPS Subpart WWW, facility becomes subject to Title V 90 days after commence construction, modification, or reconstruction. Facility has 12 months to apply from becoming subject. (15 months total)
 - If facility has potential to emit 100,000 tpy or more on a CO₂e basis, then it will be subject to Title V on July 1, 2011 and have one year to apply (July 1, 2012)

Landfill Meeting Summary

- What to do if you discover your facility is in violation of an air quality requirement
 - contact AQB compliance section to develop a compliance plan
 - each case will be reviewed on a case-by-case basis
 - Act quickly to get back in compliance
- AQB Compliance Section Contacts
 - Dennis Thielen, 515-281-4899 Dennis.Thielen@dnr.iowa.gov
 - Brian Hutchins, 515-281-8448 Brian.Hutchins@dnr.iowa.gov

Landfill Meeting Summary

- Presentations will be posted on AQB website

Questions