

Landfills Subject to Title V

September 27, 2010

Overview of Title V

- The intent of this portion of the presentation is to review:
 1. What Title V is and what makes you subject?
 2. How to calculate potential emissions?
 3. What do you need to include in a Title V application if you are subject?

What is Title V?

- Title V refers to Title V of the 1990 Clean Air Act.
- Title V is an operating permit issued to air pollution sources after the source has begun to operate.

Subject to Title V?

Examples:

- 1. If 40 CFR Part 60, Subparts WWWW or Cc apply to your facility you may be subject to Title V.

Subject to Title V?

2. Exceeding the GHG threshold of 100,000 tpy CO₂e makes you subject.
3. If your facility is a major source of air pollution meaning:

You have the potential to emit

- 100 tpy or more of a regulated pollutant
- 10 tpy or more of a single HAP
- 25 tpy or more total HAP

Calculating Potential Emissions

- You must include any part or activity of a stationary source that emits or has the potential to emit a regulated pollutant when determining potential emissions. (Fugitive emissions are not considered for Title V applicability of a landfill.)
- Potential emission totals may affect what is included in your Title V application.

Potential Emissions

- Q: How do I determine my emissions?
- A: VOC, HAP & CO emissions from the landfill are calculated through the use of LandGEM, a software program available through the EPA website www.epa.gov/ttn/chief/ or directly through AP-42.
- PM, PM-10, SO₂, NO_x from additional sources at the facility must find an approved source of emission factors ie: AP-42, webFIRE

What to Include in the Title V Application?

- Q: What do I need to include in my Title V application?
- A: You must include all sources of air pollution located at your facility in your Title V application if you are a major source or exceed the GHG threshold. Ex. Haul roads, grinders, choppers, engines etc.
- See 567 IAC 22.103(1) for exclusions.

Example of a Major Source Landfill

- **I. Facility Description and Equipment List**
- Facility Name: Central Disposal Systems, Inc.
- Permit Number: 02-TV-020R1

•	Point	Unit	Emission Unit Description
•	EP-1	EU-1	Landfill Gas Emissions
•	EP-2	EU-2	Unpaved Haul Roads
•	EP-3	EU-4	Fill/Cover Material Removal
•	EP-3	EU-5	Fill/Cover Material Truck Dumping
•	EP-10	EU-10	Landfill Gas Flare
•	EP-51	EU-51	Internal Combustion Engine (1148 bhp)
•	EP-52	EU-52	Internal Combustion Engine (1148 bhp)
•	EP-53	EU-53	Internal Combustion Engine (1148 bhp)
•	EP-54	EU-54	Internal Combustion Engine (1148 bhp)
•	EP-55	EU-55	Internal Combustion Engine (1148 bhp)
•	EP-56	EU-57	Internal Combustion Engine (1148 bhp)
•	EP-57	EU-57	Internal Combustion Engine (1148 bhp)
•	EP-58	EU-58	Internal Combustion Engine (1148 bhp)

What to Include in the Title V Application ? (con't)

- Q: What do I need to include in my Title V application if my facility is NOT a major source, has NOT surpassed the GHG threshold of 100,000 tpy CO₂ e, but has triggered Title V because of the NSPS Subpart WWW or Cc?

What to Include in the Title V Application? (con't)

- A: The Title V application just includes the source that made the facility subject to Title V and the emissions from the source.
 - ❖ Example: Include the emissions from the landfill and any sources utilizing the emissions from the landfill such as flares (voluntary and required) or engines. Haul roads are not required.

Example of a Landfill Subject to Title V by the NSPS

- **I. Facility Description and Equipment List**

- Facility Name: South Central Iowa Solid Waste Agency (SCISWA)
- Permit Number: 07-TV-005

Point	Unit	Emission Unit Description
EP-1	EU-1	Landfill Operations ⁽¹⁾

- (1) Pursuant to 567 IAC 22.101(1)"c" any source that is required to obtain a Title V operating permit solely because of an NSPS requirement, and which is not a major source, is required to obtain a Title V permit only for the emission unit(s) and related equipment causing the source to be subject to the Title V program. There may be other emission units at this facility that are not included in the Title V operating permit.

How Do I Apply for Title V ?

- Title V Forms can be found at:
 - ❖ www.iowacleanair.com
 - ❖ Operating Permits
 - ❖ Title V/CAIR Applications, Emissions Inventory/Fee Payment- Forms & Instructions

Time Frame to Apply

- 567 IAC 22.105(1)"a"(2) states the initial application for a new source shall be submitted within 12 months of becoming subject to Title V permit requirements.

Time Frame to Apply

- If your design capacity is $>$ or $=$ to 2.5 million Mg and 2.5 million cubic meters, as stated in the NSPS Subpart WWW, your facility becomes subject to Title V 90 days after you commenced construction, modification or reconstruction.
- A total of 15 months to apply.

Landfills Currently With a Title V Operating Permit

- Landfills currently operating with a Title V permit or those that have applied for a Title V operating permit may have an opportunity to rescind their permit.
 - ❖ You are not a major source
 - ❖ You have not physically exceeded 2.5 million Mg or 2.5 million cubic meters
 - ❖ You take a limit through your construction permit

Title V Obligations

- Annual emissions inventory due March 31.
- Annual fees due July 1.*
- Compliance reports & certifications due March 31 and September 30.
- Renew Title V permit every 5 years.

* Does not include GHG emissions, PM or CO

Questions

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