



DEPARTMENT OF
ECOLOGY
State of Washington

Washington State Department of Ecology
Eastern Region Office
4601 North Monroe Street
Spokane, Washington 99205-1295

Statement of Basis for
Air Operating Permit Number: **DRAFT**
Adams County Landfill
Washtucna, Washington

DATE

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List of Abbreviations

Abbreviation	Definition
AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf	Dry Standard Cubic Foot
dscf/m	Dry Standard Cubic Foot per minute
Ecology	Washington State Department of Ecology
E.I.T.	Engineer in Training
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
FCAA	Federal Clean Air Act
ft ³	Cubic foot
gr/dscf	Grains per dry standard cubic foot
hr	Hour
lb	Pound
MMBtu	Million British Thermal Units
MRRR	Monitoring, Recordkeeping, and Reporting Requirement
NOC	Notice of Construction
NO _x	Oxides of Nitrogen
NSPS	New Source Performance Standard
O ₂	Oxygen
O&M	Operation & Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM-10	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
T	Temperature
TAP	Toxic Air Pollutant
TPD	Tons Per Day
TPY	Tons Per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
w%	Percentage by Weight
Yr	year

Table 1: Annual Potential to Emit with controls in Tons Per Year (tpy) – Criteria Pollutants¹

Emission Units	PM	PM10	PM2.5	SO ₂	NO _x	CO	VOC	NMOC
Landfill (LFG-01) Fugitive	n/a	n/a	n/a	n/a	n/a	3.42	23.1	59.1
Flare (FLR-01)	4.47	4.47	4.47	7.88	10.5	197	1.19	3.05
Generator (ENG-01)	0.00616	0.00616	0.00616	0.000219	0.0123	0.0108	0.0123	0.0123
Tipper (ENG-02)	0.0151	0.0151	0.0151	0.00389	0.303	3.78	0.144	0.144
Tipper (ENG-03)	0.0151	0.0151	0.0151	0.00389	0.303	3.78	0.144	0.144
Paved Roads (PRD-01)	152	30.4	7.47	n/a	n/a	n/a	n/a	n/a
Unpaved Roads (UPR-01)	68.7	18.5	18.5	n/a	n/a	n/a	n/a	n/a
Soil Cover (STR-01)	1.52	0.72	0.109	n/a	n/a	n/a	n/a	n/a
Total	226.8	54.18	13.93	7.892	11.241	208.19	24.66	62.58

Table 2: Annual Potential to Emit in Pounds Per Year – Toxic Air Pollutants²

TAPs	Averaging Period	Emissions
Acrylonitrile	Year	3.52
Benzene	Year	142.29
Bromodichloromethane	Year	140.3
1,4-Dichlorobenzene	Year	651.7
Ethylbenzene	Year	76.8
Ethylene dibromide	Year	2.71
Ethylene dichloride	Year	7.39

¹ Potential to emit from Adams County Landfill's July 2024 initial application, based off year 2222 prediction

² Potential to emit from Adams County Landfill's July 2024 initial application, based off year 2222 prediction

TAPs	Averaging Period	Emissions
Hydrogen Sulfide	24-Hour	0.01
Methylene chloride	Year	192.0
Perchloroethylene	Year	32.4
1,1,2,2-Tetrachloroethane	Year	3.3
Trichloroethylene	Year	95.9
Vinyl Chloride	Year	2.46

1. Introduction

This document sets forth the legal and factual basis for the permit conditions in the AOP No. DRAFT issued by the State of Washington Department of Ecology for a municipal Landfill facility located near Washtucna, Washington. This document is called a “statement of basis” and is required by Washington State regulations [chapter 173-401 WAC]. A statement of basis does not contain enforceable permit conditions. Enforceable permit conditions are contained in the AOP itself.

2. Facility Identifying Information

- a) Company Name Waste Management of Washington, Inc.
- b) Facility Name Adams County Landfill
- c) Unified Business Identification Number 601-415-286
- d) Facility Address US Route 26 and Gray Road, Washtucna, WA 99371
- e) Responsible Official Adam Winston, Vice President
- f) Mailing Address 1820 South Graham Road, Medical Lake, WA 99022
- g) Facility Contact Jim Denson, PNW/BC Environmental Protection Manager
- h) Facility Contact Phone Number (602) 757-3352

3. Basis for Title V Applicability

Adams County Landfill is subject to Title V, Air Operating Permit Regulations, due to exceeding the design capacity threshold of 2.5 million megagrams of mass (municipal solid waste). 40 CFR Part 60, Subpart WWW identifies any source that exceeds the threshold must submit a Title V application and retain the Title V permit for continued operation.

4. Attainment Classification

The facility is located in an area that is classified as in attainment for all criteria pollutants as of February 2026.

5. Permitting History

October 10, 2023: Notice of Construction (NOC) Approval Order (23AQ-E029) was issued for operation of the landfill that was expected to be opened by 2025. The facility was permitted to include an emergency diesel generator, diesel Tipper, multiple Flares, and identify the fugitive emissions from the paved and unpaved roads, as well as the soil cover. The facility became subject to Title V program due to proposed design capacity (via submitted NOC Application) that exceeds the 2.5 million megagram of mass threshold.

March 12, 2024: NOC permit updated to include the addition of a single diesel Tipper. The 2023 permit was rescinded and replaced with 24AQ-E011.

DATE, 2026: Air Operating Permit No. 26AQ-0XX is issued.

6. Title V Timeline

October 10, 2023	Source became subject to Title V AOP Program
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DATE, 2026	Original Title V AOP issued (Order No. 26AQ-E0XX)
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7. Facility Description

Adams County Landfill (also known as Adams County Landfill and Recycling Center [ACLRC]) has been permitted since 1995 (but not operational) and has submitted a Solid Waste Permit modification to bring the permit up to current regulatory and industry standards.

The entrance to ACLRC is located at US Route 26 and Gray Road in Adams County, Washington, five miles East of the town of Washtucna. The landfill will accept MSW, and other permitted waste beginning late 4th quarter 2023 or first quarter 2024. Based on projected waste volumes and using industry standard waste densities, ACLRC is projected to close in year 2206.

ACLRC has a design capacity of 156 million yards which is approximately 163 million tons of MSW.

The sources of air pollution include the fugitive landfill surface, a 750 hp (559 kW) diesel generator, Two 148 hp (110.1 kW) landfill tipper, landfill gas flare, as well as dust emissions from paved and unpaved roadways, and cover soil handling.

Modern landfills are operated to control emissions as waste is placed by applying approved daily covers and then thicker soil intermediate covers as the landfill develops. These covers control landfill fugitive emissions after the waste has been disposed and throughout the period prior to the initial GCCS and Flare are installed.

Moisture contained in the waste, precipitation, and the volume of organics are the main drivers to create conditions in the landfill for Methane and NMOC generation. The lower the moisture, the more slowly the landfill gas is generated within the landfill. ACLRC is located in an arid climate which retards the methanogenesis process due to the lack of moisture (precipitation) within the landfill. Based on the arid climate condition and wastes acceptance projections ACLRC is estimating that methane and NMOC generation will be managed by the landfill covers prior to the installation of the GCCS system and the candlestick flare. The LFG surface emissions for this scenario prior to the GCCS and flare installation account for a future scenario with much higher surface emissions than the year the candlestick flare would be installed. Fugitive emissions from the landfill surface are accounted for as emission unit LFG-01.

Landfill gas production in the emission estimates is based on a peak landfill gas flow of 11,300 standard cubic feet per minute (scfm) expected in the year 2222 based on the US Environmental Protection Agency (EPA) landfill gas generation model (LandGEM).

MSW acceptance will ramp up as detailed in the LandGEM model, starting with 40,600 tons in 2024 and scale up to 943,000 tons in year 2060, at which point this tonnage is projected to remain constant until closure in 2206.

The landfill gas fugitive emission source, LFG-01, will emit CO, VOC, NMOCs, and greenhouse gases (GHG). HAPs will also be emitted. The HAP concentrations in the landfill gas are based on industry standard emission factors.

a) Diesel Engine (ENG-01)

The 750 hp diesel engine, ENG-01, will emit standard combustion emissions such as particulate matter (PM), sulfur dioxide (SO₂), Nitrogen oxides (NO_x), as well as CO, VOC and GHG. This emergency diesel generator is projected to operate for the maximum allowable 50 hours per year in nonemergency situations. The only fuel to be combusted in this engine is ultra-low sulfur diesel, which is less than 15 parts per million (ppm) of sulfur.

b) Landfill Tipper (ENG-02 and ENG-03)

The two 148 hp diesel engines, ENG-02 and ENG-03, will emit standard combustion emissions such as particulate matter (PM), sulfur dioxide (SO₂), Nitrogen oxides (NO_x), as well as CO, VOC and GHG. This landfill tipper is projected to operate for up to 3,120 hours per year, each. The only fuel to be combusted in this engine is ultra-low sulfur diesel, which is less than 15 ppm of sulfur.

c) Landfill Gas Flare (FLR-01)

A 30.4 million BTU (1,000 SCFM at 50% Methane) candlestick flare, (FLR-01), will be used as the control device for combusting landfill gas once the GCCS system is installed. In compliance with Ecology requirements the GCCS system and Flare are conservatively estimated to be required in 2031, earlier than the projected NSPS date of 2035. These estimates are highly conservative as the LandGEM model uses factors for moisture equal to 25 inches of rain per year, whereas ACRLC is located in an arid climate experiencing approximately seven inches of rain per year. This results in significantly lower LFG emission rates.

The flare will emit standard combustion emissions such as PM, SO₂, NO_x, CO, VOC/NMOC, and GHG. The flare will be operating continuously throughout all hours of the year.

Installation of the GCCS and control flare are contingent on several factors including but not limited to waste acceptance rates, outcomes of Tier 1 and Tier 2 testing, and annual NMOC emissions projections in compliance with state and federal requirements.

d) Particulate Emissions (PRD-01, UPR-01, and STR-01)

Particulate matter is separated into PM(TSP), PM₁₀, and PM_{2.5}. Particulate matter (PM) is defined as all airborne particulate. PM smaller than 10 microns in diameter is defined as PM₁₀ and smaller than 2.5 microns in diameter is defined as PM_{2.5}. PM emissions are expected to be released from paved roads (PRD-01), unpaved roads (UPR-01), as well as cover soil handling (STR-01).

The paved road to the fill area is two miles long. The unpaved road is 0.5 miles long and is controlled by water trucks and lignin for dust suppression at a 90% control efficiency. The cover soil will also be watered for a 90% control efficiency during handling.

8. Facility Emission Units/Processes

- a) Source Wide (Section 2.1 in AOP)
- b) Open Flare and gas Collection System (Section 2.2 and 2.3) in AOP)
- c) Solid Waste Landfill (Section 2.4) in AOP)

9. Insignificant Emission Units and Activities

There are no identified Categorically Insignificant Emission Units.

10. Changes to Underlying Ecology New Source Review Orders of Approval

Before this AOP was issued, the following Adams County Landfill NOC Approval Orders have been modified:

On March 12, 2024, **Order No. 24AQ-E011** superseded and rescinded Order No. 23AQ-E029. The updated order covers the addition of a second diesel Tipper to be added to the approved equipment that generate air emissions.

On October 10, 2023, **Order No. 23AQ-E029** was the initial Approval Order issued to Adams County Landfill. The new order included approval for the facility to operate the emissions related equipment to successfully maintain the emissions of the facility. The Order also approved the installation and utilization of the GCCS capture landfill gases and route them to an open Flare for destruction.

11. Changes to Underlying State Requirements

Since this is the first issuance of the Title V permit for Ephrata Landfill, there have been no changes to state requirements yet. This will remain as a place holder for future updates.

Regulatory Citation	Name of Chapter or Section	State	Federal (SIP)
WAC 173-XXX-XXX	TBD	TBD	TBD

12. Federal Regulation Applicability Discussion

a) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

The following subparts to 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants for Source Categories) were promulgated or revised within the term of the current AOP have not been previously addressed or are included here for clarification of non-applicability purposes.

i) Title 40 CFR Part 61, Subpart M, the “Asbestos NESHAP”

On April 5, 1984, EPA promulgated the National Emission Standard for Asbestos. The NESHAP applies to a variety of asbestos related activities. One of these activities is waste disposal. Ephrata Landfill is a waste disposal facility that receives asbestos containing waste material from manufacturing, fabricating, demolition, renovation, or spraying operation wastes. Ephrata Landfill is subject to this NESHAP. AOP condition 1(dd), 3.d.vi.4, and 3.d.vii detail the requirements for compliance with Subpart M.

ii) Title 40 CFR Part 63, Subpart AAAA, the “Landfill NESHAP”

On January 16, 2003, EPA promulgated the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. The NESHAP applies to municipal solid waste landfills that have accepted waste since November 8, 1987, or have additional capacity for waste deposition, may include a bioreactor, and meets any one of three other criteria.

The applicability criteria define a subject landfill as one that is a major source or collocated with a major source as defined in 40 CFR §63.2 of subpart A. Specifically, major source is defined as, "a stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants". As indicated in Table 1, Ephrata Landfill has the potential to emit less than 10 tons per year each individual hazardous air pollutant and less than 25 tons per year in combination of hazardous air pollutants.

The applicability criteria also define a subject landfill as one that has a design capacity greater than, or equal to, 2.5 million megagrams and 2.5 million cubic meters and has estimated uncontrolled emissions greater than, or equal to, 50 megagrams per year NMOC. Once each of those thresholds are exceeded, 40 CFR §63.1945(f) states that Ephrata Landfill will need to comply with Subpart AAAA by the date the source is required to install a collection and control system by 40 CFR §60.752(b)(2) of subpart WWW.

As discussed in Section 3(d)(v)(2) of the AOP, Ephrata Landfill's estimated uncontrolled annual emissions of NMOC are not forecasted to exceed 50 megagrams per year. If subsequent estimates indicate the threshold will be exceeded with three or more years remaining in AOP No. 25AQ-E016 term, or revisions thereof, the AOP may be reopened for cause to include the requirements of Subpart AAAA.

b) New Source Performance Standards (NSPS)

The following subparts to 40 CFR 60 (Standards of Performance for New Stationary Sources) were promulgated within the term of the current AOP and have not been previously addressed or are included here for clarification of non-applicability purposes.

i) Title 40 CFR Part 60, Subpart WWW, the "Landfill NSPS"

On March 12, 1996, EPA promulgated Title 40 CFR Part 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. The NSPS applies to each municipal solid waste landfill that commenced construction, reconstruction} or modification, or began accepting waste, on or after May 30, 1991. The NSPS requires landfills with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters to submit non-methane organic compound (NMOC)

emission reports. When the pre- controlled NMOC emissions are calculated at or above 50 megagrams per year additional requirements are triggered.

Ephrata Landfill is considered a "new" landfill under the NSPS because it began construction on a landfill expansion after May 31, 1991. As such, Ephrata Landfill is subject to Subpart WWW. Ecology received a copy of the permittee's initial Design Capacity Report and NMOC Report on June 19, 2019. The initial NMOC emission rate report listed the NMOC emission rate as 4.4 Mg/yr starting in 2022 and reaching its peak in 2035 at 61.3 MG/yr using the default variable values listed in 40 CFR §60.754(a)(1)(i).

The most recent New Source Performance Standards Tier 2 Sampling, Analysis, and Landfill NMOC Emissions Estimates, received June 19, 2019, listed total landfill NMOCs as 53.1 Mg/yr, 57.6 Mg/yr, and 61.3 Mg/yr for calendar years 2033 through 2035, then declining to 49.2 Mg/yr from calendar years 2036 through 2046. Because NMOC emissions are not less than 50 Mg/year during those years, annual NMOC reporting is required.

AOP Applicable Requirement 2.2.14 details the current requirements for compliance with Subpart WWW. If the calculated NMOC emissions are not less than 50 Mg/year by 2046, after issuance of the AOP 25AQ-E016, the AOP, or revisions thereof, will be reopened to incorporate additional requirements specified by Subpart WWW.

13. Compliance Assurance Monitoring (CAM) Applicability Analysis

- a) On October 22, 1997, EPA promulgated the Compliance Assurance Monitoring rule (Title 40 Code of Federal Regulations Part 64). This Rule requires specialized pollutant-specific monitoring for those emission units which meet the following criteria:
 - i) The unit is located at a Title V Air Operating Permit source.
 - ii) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof), other than an emission limitation or standard that is exempt.
 - iii) The unit uses a control device to achieve compliance with any such emission limitation or standard.
 - iv) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as an Air Operating Permit Source.
- b) Applicability

The emission unit considered for CAM applicability is the landfill itself. Following is a summary of how a landfill compares to the above listed criteria:

- i) Adams County Landfill is a Title V Air Operating source (see Basis for Title V Applicability, Section 3).
- ii) Adams County Landfill has a landfill gas collection system which must be routed to a control device. The control device tied to the emission standard discussed above is an open flare.

14. Applicable/Inapplicable Requirements Determinations/Explanations

- a) Initial or one-time NOC requirements that have not been included in the AOP as ongoing applicable requirements: covers Approval Cond. 2-5 of Order No. 24AQ-E011
 - i) Order No. 24AQ-E011, Approval Condition 2(a), states the facility is required to follow all recommended installation, configuration, operation, and maintenance provisions supplied by the equipment manufacturers.
 - 1) This requirement is ongoing.
 - ii) Order No. 24AQ-E011, Approval Condition 2(b), states the facility is required to develop and maintain an Operations and Maintenance (O&M) Manual. This condition also outlines some of the required information that must be placed in the O&M Manual.
 - 1) This requirement is ongoing.
 - iii) Order No. 24AQ-E011, Approval Condition 2(c), states the emissions units must be operated in accordance with the O&M Manual.
 - 1) This requirement is ongoing.
 - iv) Order No. 24AQ-E011, Approval Condition 2(d), states the Permittee must assess all air quality complaints and initiate corrective action for valid complaints.
 - 1) This requirement is ongoing.
 - v) Order No. 24AQ-E011, Approval Condition 3(a), states the facility must review the required O&M Manual, Fugitive Dust Control Plan, and any other relevant operating plan must be reviewed annually.
 - 1) This requirement is ongoing.
 - vi) Order No. 24AQ-E011, Approval Condition 3(b), states that the Permittee must retain O&M records on the premises and be readily available.
 - 1) This requirement is ongoing.
 - vii) Order No. 24AQ-E011, Approval Condition 3(c), states the Permittee must keep records of any air quality complaints received and the action the Permittee took to resolve any valid complaints.

- 1) This requirement is ongoing.
- viii) Order No. 24AQ-E011, Approval Condition 3(d), states the date, time, and duration of any time control equipment is out of service must be documented.
 - 1) This requirement is ongoing.
- ix) Order No. 24AQ-E011, Approval Condition 3(e), states all data required from the Approval Order must be readily available for five years, and made available for authorized personnel from Ecology.
 - 1) This requirement is ongoing.
- x) Order No. 24AQ-E011, Approval Condition 3(f), states the Permittee must complete any monitoring and recordkeeping necessary to determine compliance with the Approval Order.
 - 1) This requirement is ongoing.
- xi) Order No. 23AQ-E011, Approval Condition 3(g), states surface monitoring must be done and records kept on site to determine compliance.
 - 1) This requirement is ongoing.
- xii) Order No. 24AQ-E011, Approval Condition 3(h), states the location, equipment required, specifications to be met, calibration procedures, and whom can perform the required surface monitoring.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.
- xiii) Order No. 24AQ-E011, Approval Condition 3(i), states surface monitoring is required in accordance with Section 8.3.1 of Method 21 of Title 40 Part 60 Code of Federal Regulations, Appendix A-7, except that the probe inlet will be placed within five to ten centimeters (two to four inches) off the ground.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.
- xiv) Order No. 24AQ-E011, Approval Condition 3(j), states that records will be kept of each instrument calibration and monitoring events that take place.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.
- xv) Order No. 24AQ-E011, Approval Condition 3(k), states that Ecology must be notified if surface monitoring reads an exceedance of methane above 1,250 ppm.
 - 1) Ecology does not have any records or reports of exceedances at this time.

- xvi) Order No. 24AQ-E011, Approval Condition 3(l), states the facility will make all required records available for five years for inspection.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.
- xvii) Order No. 24AQ-E011, Approval Condition 3(m), states equipment must be operated and maintained by properly trained personnel.
 - 1) This requirement is ongoing.
- xviii) Order No. 24AQ-E011, Approval Condition 3(n), states equipment must be kept in good operating condition at all times.
 - 1) This requirement is ongoing.
- xix) Order No. 24AQ-E011, Approval Condition 3(o), states the Permittee must keep records of the weight of refuse received at the landfill.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.
- xx) Order 24AQ-E011, Approval Condition 3(p), states the Permittee must keep records of the sulfur content for diesel used by the permitted equipment.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.
- xxi) Order No. 24AQ-E011, Approval Condition 4(a), states the facility prepare a Fugitive Dust Control Plan (FDCP) and keep it on site along with its location known to employees.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.
- xxii) Order No. 24AQ-E011, Approval Condition 4(b), states the FDCP will be completed within 90 days of issuance of the Approval Order, and reviewed annually.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.
- xxiii) Order No. 24AQ-E011, Approval Condition 4(c), states the required information that will be included in the FDCP.
 - 1) Compliance with this condition has not been verified at this time, it will be verified during the next scheduled inspection.

- xxiv) Order No. 24AQ-E011, Approval Condition 5(a), states periodic testing is not required at this time, but Ecology may require source testing in the future in accordance with WAC 173-400-105(4).
 - 1) This requirement is ongoing.
- xxv) Order No. 24AQ-E011, Approval Condition 5(b), states if source testing is requested by Ecology, a test plan from the Permittee is required at least 30 days prior to the test.
 - 1) This requirement is ongoing.
- xxvi) Order No. 24AQ-E011, Approval Condition 5(c), states the required information that must be in the test report of any source testing completed by the Permittee.
 - 1) This requirement is ongoing.
- xxvii) Order No. 24AQ-E011, Approval Condition 5(d), states the Permittee must provide sampling ports and platforms for any required or requested testing in accordance with 40 C.F.R. 60.8, 40 C.F.R. 63.7(d), and WAC 173-400-105(4).
 - 1) This requirement is ongoing.
- xxviii) Order No. 24AQ-E011, Approval Condition 5(f), states any proposed alternate test methods or procedures must require approval from Ecology before the Permittee can continue.
 - 1) This requirement is ongoing.

15. Monitoring, Recordkeeping, and Reporting Requirement (MRRR) Sufficiency Explanations

This section provides brief discussions regarding the reasoning behind the MRRR's included as part of the AOP. The criterion is that each MRRR must be sufficient to assure compliance with the associated condition, emission standard or work practice.

Gapfilling: if an applicable requirement does not include monitoring, recordkeeping and reporting requirements sufficient to assure compliance, the AOP will establish additional requirements. This action is known as gapfilling. Monitoring, Recordkeeping and Reporting Requirements that include gapfilling are identified by a note following the MRRR description.

- a) **MRRR 3** – The nature of this requirement is to cover the minimum requirements necessary to cover the monitoring and maintenance needed at the facility.
 - i) **MRRR 3(a) Annual Facility Operations Review**

The permittee shall perform an annual review to ensure compliance with the following requirements. This annual review must be present in the annual

monitoring report. Documentation of the annual review must be kept on-site for at least five years and include a signed compliance verification. The annual review shall include that all emission units are using reasonably available control technology (RACT), reasonable precautions are being taken to prevent the release of air contaminants from operation of all sources emitting fugitive particulate emissions, no person is causing or allowing any means to conceal or mask the emission of any air contaminants which violate any required air regulations. The permittee shall also ensure reasonable precautions are being taken to prevent fugitive dust from becoming airborne and emission sources are operated and maintained such to minimize fugitive dust emissions, air pollutants are not being emitted in violation of Chapter 70.94 RCW (Washington Clean Air Act), and open burning is not being performed on-site except as explicitly allowed under WAC 173-425 (Washington Open Burning Regulations).

ii) MRRR 3(b) Monthly Walk Around Surveys

Surveys must be performed monthly and the survey results must be recorded and reported semiannually in the semi-annual monitoring reports, confirming that reasonable precautions are being taken to prevent the release of air contaminants from operation of all sources emitting fugitive particulate emissions. This includes adhering to the fugitive dust control plan and performing periodic EPA Method 22 and/or EPA Method 9 assessments (if required). The permittee shall confirm reasonable precautions are being taken to prevent fugitive dust from becoming airborne and emission sources are operated and maintained to minimize fugitive dust emissions. This includes adhering to the fugitive dust control plan and performing periodic EPA Method 22 and/or EPA Method 9 assessments (if required). And the permittee shall confirm cover material is placed appropriately across the landfill including daily soil cover or approved alternative daily cover over the entire working face and intermediate cover at least 12 inches in thickness on all areas with waste that has been inactive for 180 days or more.

iii) MRRR3(c) Monthly Visual Emission Surveys

The permittee shall perform monthly visual emission surveys at the property boundary based on EPA Method 22. If visible emissions are observed, perform a visual emission survey based on EPA Method 9. Visible emissions shall not exceed 20% opacity averaged over six-minute time period using EPA Method 9. Results of monthly surveys must be recorded and reported semiannually in the semiannual monitoring reports.

iv) MRRR 3(d) Odor

The permittee shall take corrective action as soon as possible but no later than within three working days in the event that odor from the project is reported in the form of a complaint beyond the property boundary. Permittee shall keep records

and notify Ecology as required by MRRR 3(e) in the Air Operating Permit. If odor is reported beyond the property boundary following corrective action, Ecology may order the permittee to take specific measures to control odor. These measures may include, but are not limited to, restrictions on the size of the active face, enclosure of the active face, modifications to gas or leachate collection or control systems and limitations on the amount of solid waste received by the landfill.

v) MRRR 3(e) Air Emission Complaints

The permittee shall record and investigate air pollution complaints as soon as possible, but no later than three business days after receipt. Upon receiving a complaint, the permittee shall record:

- 1) The date and time of the complaint,
- 2) The name of the person complaining, if known,
- 3) The nature of the complaint, and
- 4) The date, time and nature of any corrective action taken.

The permittee shall also identify complaints regarding these emissions as follows if available:

- 5) Any emissions that are, or are likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property, or
- 6) Any emissions from fallout, or
- 7) Any track-out onto paved roads open to the public, or
- 8) Any emissions of odor-bearing air contaminants, or
- 9) Other emissions.

The permittee shall correct any problems identified by these inspections or complaint investigations as soon as possible, but no later than 24 hours after identification or shut down the unit or activity until it can be repaired or corrected or report the problem as a deviation in the semiannual monitoring report.

The permittee shall keep records of complaints received from the public, Ecology, or any other entity. Complaints shall be promptly addressed (within 24 hours). Records shall be maintained of the permittee's action to investigate the complaint, and what, if any, corrective action was taken in response to the complaint. Ecology shall be notified within three business days of receipt of any complaint.

vi) MRRR 3(f) Access to the Facility by Ecology or EPA

Upon request, the facility must grant access on-site to Ecology or EPA, for the following reasons, but not limited to:

- 1) Give Ecology authority to conduct source tests and access to records to determine compliance with standards.
- 2) Personnel from Ecology, EPA or other regulatory authority shall have the power to enter the facility at reasonable times upon presentation of appropriate credentials for the purpose of investigating conditions specific to the control, recovery, or release of air contaminants into the atmosphere.

vii) MRRR 3(g) Notice of Construction (NOC) Applications

The permittee must adhere to New Source Review and notice of construction requirements in WAC 173-400-110. If an emission control technology needs to be replaced or substantially altered, WAC 400-114 must be adhered to.

viii) MRRR 3(h) Excess Emissions

The permittee shall report to Ecology or the Regulatory Authority as soon as possible if it is discovered that excess emissions represent a potential threat to human health or safety or which the owner or operator of the source believes to be unavoidable. As soon as possible currently defined in permit as 48 hrs. Report excess emissions which represent a potential threat to human health or safety as soon as possible, but in no case later than twelve hours after the excess emissions were discovered. Excess emissions which the owner or operator of the source believes to be unavoidable, per the criteria under WAC 173-400-109, must be reported to the permitting authority as soon as possible after the excess emissions were discovered. Unavoidable excess emissions must be proven to Ecology as to why they were not preventable.

ix) MRRR 3(i) Emission Inventory

- 1) Permittee shall submit an inventory of emissions from the source for each calendar year. The inventory shall include segmented stack and fugitive emissions of TSP, PM₁₀, PM_{2.5}, SOX, CO, NOX, VOC, lead, and ammonia. The inventory shall also include the data elements of: inventory year, inventory start date, inventory end date, contact name, contact phone number, Federal Information Processing Standard code, facility identification codes, unit identification code, process identification code, stack identification code, site name, physical address, Standard Classification Code, heat content (fuel) (annual average), ash content (fuel) (annual average), sulfur content (fuel) (annual average), pollutant code, activity/throughput (for each period reported), annual emissions, emission factor, winter throughput (percent), spring throughput (percent), summer throughput (percent), fall throughput (percent), hr/day in operation, days per week in operation, weeks per year in operation, as defined in 40 CFR Part 51, Subpart A, Appendix A, 7/1/13. The inventory shall be submitted for each calendar year, no later than **April 15th** of the following year in the annual monitoring report.

(1) The source shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emission inventories shall be entered into the Washington Emissions Inventory Repository System (WEIRS). To access WEIRS, the Permittee, a representative of the Permittee, or both shall need to create or more Secure Access Washington accounts, and request admittance to the WEIRS system. WEIRS was formerly known as the Washington Emissions Inventory Repository Database and may be referred to as such in some instances. Secure Access Washington can be accessed at: <https://secureaccess.wa.gov>

x) MRRR 3(j) Source Test

Ecology may require any source under the jurisdiction of ecology to conduct stack and/or ambient air monitoring and to report the results to ecology. To demonstrate compliance, Ecology or alternative authority may conduct or require that a test be conducted of the source using approved EPA methods from 40 CFR Parts 51, 60, 61 and 63 (in effect on July 1, 2010) or procedures contained in "Source Test Manual - Procedures for Compliance Testing," from Washington Department of Ecology. The operator of a source may be required to provide the necessary platform and sampling ports for ecology personnel or others to perform a test of an emissions unit. Ecology shall be allowed to obtain a sample from any emissions unit. The operator of the source shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

xi) MRRR 3(k) New Source Performance Standards

All applicable new source performance standards must be adhered to. Applicability is only triggered by certain facility constructions or modifications and shall be communicated to Ecology in a notice of construction application.

xii) MRRR 3(l) Public Comment

The facility is required to pay for the cost of public notice and the opportunity for public comment.

xiii) MRRR 3(m) Prevention of Significant Deterioration (PSD) Permitting

If PSD is triggered by the facility becoming a major source or from a major modification, PSD requirements noted in WAC 173-400-720 must be adhered to.

xiv) MRRR 3(n) Greenhouse Gas (GHG) Reporting

The permittee shall monitor the emissions of GHGs and confirm that if 10,000 metric tons of GHGs or more per calendar year, as defined under WAC 173-441-020(1)(g), reporting of GHG to Ecology is mandatory.

The Permittee shall develop a written GHG monitoring plan in accordance with WAC 173-441-050(6)(e). The Permittee shall revise the GHG monitoring plan as needed to reflect changes in processes, monitoring instrumentation, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.

Reports must meet the requirements of WAC 173-441-050 and include the annual emissions of the GHGs listed in WAC 173-441-040 from source categories listed in WAC 173-441-120. The annual GHG report shall be submitted electronically in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology.

- 1) Facilities required to report GHG emissions to the EPA under 40 CFR Part 98 are required to submit a report to Ecology no later than March 31st for emissions in the previous calendar year if required to submit GHG emissions report to EPA.
- 2) Facilities not required to report GHG emissions to the EPA under 40 CFR Part 98, must submit a report to Ecology no later than October 31st of each calendar year for GHG emissions in the previous calendar year. (Note: The Permittee is anticipated to trigger this report deadline.)
- 3) All requests, notifications, and communications to Ecology pursuant GHG emissions reporting, other than submittal of the annual GHG report, shall be submitted to the following address:

Greenhouse Gas Report
Air Quality Program Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

- 4) The Permittee shall submit a revised annual GHG report within forty-five days of discovering that an annual GHG report that the person previously submitted contains one or more substantive errors. A substantive error is an error that impacts the quantity of GHG emissions reported or otherwise prevents the reported data from being validated or verified. The revised report must correct all substantive errors.
- 5) Ecology may notify the Permittee in writing that an annual GHG report previously submitted contains one or more substantive errors. Such notification shall identify each such error. The Permittee shall, within 45 days of receipt of the notification, either resubmit the report that, for each identified substantive error, corrects the identified substantive error (in accordance with the applicable requirements of this permit) or provide information demonstrating that the previously submitted report does not contain the identified substantive error or that the identified error is not a substantive error.

- 6) The Permittee shall maintain records in accordance with WAC 173-441-050, retaining, at a minimum, the following:
 - (a) A list of all units, operations, processes, and activities for which GHG emissions were calculated.
 - (b) The data used to calculate the GHG emissions for each unit, operation, process, and activity, categorized by fuel or material type. These data include, but are not limited to, the following information:
 - (c) The GHG emissions calculations and methods used, as required by WAC 173-441- 120.
 - (d) Analytical results for the development of site-specific emissions factors.
 - (e) The results of all required analyses for high heat value, carbon content, and other required fuel or feedstock parameters.
 - (f) Any facility operating data or process information used for the GHG emission calculations.
 - (g) Copies of the annual GHG reports.
 - (h) Missing data computations. For each missing data event, also retain a record of the cause of the event and the corrective actions taken to restore malfunctioning monitoring equipment.
 - (i) The results of all required certification and quality assurance tests of continuous monitoring systems, fuel flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.
 - (j) Maintenance records for all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.
 - 7) All costs of activities associated with administering the reporting program, as described in RCW 70.94.151(2), are fee eligible. The Permittee must pay a reporting fee for each year they submit a report to Ecology.
- xv) MRRR 3(o) Toxic Air Pollutant Emissions

Notice of Construction applications and the annual emission inventory must include toxic air pollutant emission information.

xvi) MRRR 3(p) Air Quality Fees

Air quality fees must be paid when applicable as defined under WAC 173-455. The Permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the Permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW. Ecology may revoke this permit if the permit fees are not paid per WAC 173-401-930(3).

xvii) MRRR 3(q) Asbestos Requirements

Notification of demolition and agitation to regions of the facility with asbestos must be sent to Ecology. Records must be maintained onsite.

1) Asbestos Disturbance Notification

The owner or operator must notify the compliance office in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation shall begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the compliance office at least 10 working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. Include the following information in the notice:

- (a) Scheduled starting and completion dates.
- (b) Reason for disturbing the waste.
- (c) Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the Agency may require changes in the emission control procedures to be used.
- (d) Location of any temporary storage site and the final disposal site.

2) Asbestos Records and Reports

The owner or operator shall maintain records and reports in accordance with 40 CFR 61.154(e) and for a period of at least five years.

3) Asbestos Location Records

Permittee shall maintain, until closure, location records of the asbestos containing waste subject to 40 CFR 61.154 in accordance with 40 CFR 61.154(f).

xviii) MRRR 3(r) Operations and Maintenance (O&M) Manual

The permittee shall confirm the emission units must be operated and maintained in accordance with the O&M manual. The O&M manual must be reviewed annually and this review recorded. O&M records must be kept on premises in hard copy or readily available on-site electronically. The plan must reflect good industrial practice and must include a record of performance and periodic inspections of process and control equipment. In most instances, a manufacturer's operations manual or an equipment operation schedule may be considered a sufficient operation and maintenance plan. The source owner or operator must make a copy of the plan available to ecology upon request. A source specific Operations and Maintenance (O&M) manual shall be developed and followed. Manufacturer's instructions may be referenced. O&M manual development shall be completed no later than *date*. The O&M manual shall be reviewed no less than annually and updated as necessary. The O&M Manual shall be kept on-site in a location readily accessible to employees.

xix) MRRR 3(s) Facility Dust Control Plan

The permittee shall ensure the fugitive dust shall be controlled in accordance with a Fugitive Dust Control Plan (FDCP), to be prepared by the permittee and kept on-site in a location known and accessible to employees. The FDCP must be prepared using the guidelines in the document EPA-450/3-88-008 and may be incorporated into the O&M Manual required by Section 3(r). The FDCP must be reviewed annually and all review and changes recorded.

xx) MRRR 3(t) Recordkeeping Data

The Permittee shall keep records of required monitoring information that includes, where applicable, the following:

- 1) The date, place, and time of sampling or measurements.
- 2) The date(s) analyses were performed.
- 3) The company or entity that performed the analyses.
- 4) The analytical techniques or methods used.
- 5) The results of such analyses.
- 6) The operating conditions as existing at the time of sampling or measurement.

The Permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. Such records must be kept for any times a control technology equipment is out of service.

The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings from continuous monitoring instrumentation, and copies of all reports required by this permit.

xxi) MRRR 3(u) Emergency Notifications

The Permittee must notify Ecology within one business day of landfill fires, control failures, or similar.

xxii) MRRR 3(v) Semiannual Monitoring Reports

The Permittee shall submit semiannual monitoring reports of any required monitoring at least once every six months. At a minimum, reports for January 1st through June 30th and July 1st through December 31st, shall be due **October 15th** and **April 15th**, respectively. The **October 15th** report shall be referred to as the first semiannual monitoring report, and the **April 15th** report shall be referred to as the second semiannual monitoring report, or annual monitoring report. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with WAC 173-401-520.

These reports shall include all surface emission monitoring, monthly walk-around surveys, monthly visual emission surveys, any required source tests, deviations, excess emissions, as well as any other required monitoring on a semiannual basis. On an annual basis in the annual report due **April 15th** shall also include the annual emissions inventory, facility operations review, annual review of both the O&M manual and FDCP, annual waste in place report, and heat input capacity report (if required).

xxiii) MRRR 3(w) Deviations

The Permittee shall report deviations from permit requirements, including those attributable to upset conditions, the probable cause of such deviations, and any corrective actions or preventative measures taken. Such deviations shall be reported '**promptly**'. For deviations which represent a potential threat to human health or safety, '**promptly**' means as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered. The source shall maintain a contemporaneous record of all deviations. Other deviations shall be reported no later than thirty (30) days after the end of the month during which the deviation is discovered. Copies of reports shall be sent to Ecology.

xxiv) MRRR 3(x) Waste in Place Reports

The permittee shall submit an initial waste in place report to the department in accordance with WAC 173-408-170(1). This report shall be submitted with the semiannual monitoring report. Each owner or operator of an active MSW landfill having fewer than 450,000 tons of waste in place must submit an annual waste in place report to the department and local authority in accordance with WAC 173-408-170 (3) and (4) until either:

- 1) The active MSW landfill reaches a size of greater than or equal to 450,000 tons of waste in place; or
- 2) The owner or operator submits a closure notification under WAC 173-408-170(8).

xxv) MRRR 3(y) Heat Input Capacity Reports

The permittee shall monitor the waste in place until it reached 450,000 tons or more, then submit annual landfill gas heat input capacity (HIC) reports annually with the annual monitoring report. These reports must be submitted to the department and local authority until either:

- 1) The MSW landfill reaches a HIC of 3,000,000 British thermal units per hour recovered or greater; or
- 2) The owner or operator submits a closure notification under WAC 173-408-170(8).

xxvi) MRRR 3(z) WAC 173-408-080 Requirements (When Required)

If the landfill reaches an HIC of 3,000,000 British thermal units per hour and trips the 200 ppm threshold during surface emission monitoring events, the requirements detailed in WAC 173-408-080 are applicable:

- 1) The permittee shall confirm the Gas Collection and Control System (GCCS) Design Plan must follow the details outlined in WAC 173-408-020; -025; -100; -120, and -130.
- 2) The permittee shall ensure the Gas collection and control system requirements outlined in WAC 173-408 and in the Title V Air Operating Permit are met and maintained.
- 3) The permittee shall ensure the requirements for flares are maintained, the gas is routed to the flare, and the flare maintains a 99 percent destruction efficiency by weight.
- 4) The permittee shall ensure the requirements of gas control devices other than flares (such as energy recovery devices or gas treatment systems) are maintained. Venting gases to the ambient air is not permitted.
- 5) In the event the permittee needs to perform a source test, the permittee shall follow the guidance in WAC 173-408-120.

- 6) The permittee shall confirm the Wellhead Gauge Pressure must operate under a vacuum, except as provided in WAC 173-408-090, or if a geomembrane or synthetic cover is used, or if the well is decommissioned.
- 7) The permittee shall confirm individual wells involved in well raising meet the requirements of when new fill is being added or compacted in the immediate vicinity around the well; and once installed, a gas collection well extension is sealed and capped until the raised well is reconnected to a vacuum source.
- 8) The permittee shall confirm that repairs and temporary shutdown of gas collection system components meet the following requirements:
 - (a) The requirements of subsections 3(z)(ii) and 3(z)(vi) of this section do not apply to individual landfill gas collection system components that must be temporarily shut down to repair or modify components of the gas collection system, to connect new landfill gas collection system components to the existing system, to prevent or extinguish landfill fires, or if the MSW landfill engages in construction, active mining, or law enforcement activities, provided the following requirements are met:
 - (i) Methane emissions are minimized during shutdown under subsection 3(z)(i)(7) of the Title V Air Operating Permit. The design plan must include a description of this section.
 - (ii) In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within one hour of the collection or control system not operating.
 - (iii) Efforts to repair the collection or control system must be initiated and completed to minimize downtime, and the collection and control system must be returned to operation no more than five calendar days following initial shutdown. In the event the collection and control system cannot be returned to operation in five calendar days following initial shutdown, the owner or operator must submit a notification to the department or local authority in accordance with WAC 173-408-140; and
 - (iv) Records are kept on the actions being taken, in accordance with WAC 173-408-160(1)(a)(xiv), (xv), and (xvi).
- 9) Collection System Requirements under 40 CFR Part 60 Subpart XXX
 - (a) Operate the collection and control device installed to comply with this subpart in accordance with the provisions of §§60.763, 60.765, and 60.766 of Subpart XXX of 40 CFR 60; or the provisions of §§63.1958,

63.1960, and 63.1961 of Subpart AAA of 40 CFR 63. Once the permittee begins to comply with the provisions of §§63.1958, 63.1960, and 63.1961, the permittee must continue to operate the collection and control device according to those provisions and cannot return to the provisions of §§60.763, 60.765, and 60.766.

10) Wellheads Avoiding Fires or Increased Well Temperatures

- (a) Wells with positive pressure are allowed in an effort to avoid fires or increased well temperatures. The owner or operator must record instances when positive pressure occurs in efforts to avoid a fire. These records must be submitted with the annual reports as provided in §60.767(g)(1); All design changes must be approved by Ecology as specified in §60.767(c).

11) Wellhead temperature requirement:

- (a) The permittee must operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees Fahrenheit). The owner or operator may establish a higher operating temperature value at a particular well with approval from Ecology.

xxvii) MRRR 3(aa) Submittals

The permittee shall ensure that reports, test data, monitoring data, and notifications required by this permit, and requests for permit renewal shall be submitted to Ecology at:

**Washington State Department of Ecology
Air Quality Program
4601 N. Monroe Street
Spokane, WA 99205-1295**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

16. Streamlining Explanations

- a) WAC 173-400-040(2) – No source shall exceed 20 percent opacity for an emission. In NOC Order 24AQ-E011, Condition 1(c)(ii) – Adams County Landfill is limited to Zero percent opacity at the property boundary for landfill operations. Since the condition

included in the NOC order is clearly more stringent and expressed in the same units as WAC 173-400-040(2), it is appropriate to apply streamlining to this requirement.

17. Clarifications and Interpretations

- a) Recordkeeping retention time – The current permit that applies to the permittee (Order No. 2AQ-E011, Condition 3(e) and 3(l) includes a condition which require applicable recordkeeping/reporting to be maintained for a period of time of five years. However, Standard Condition 1(aa)(iii) of the AOP requires that the permittee retain all records or information of this type for a period of at least five years. Due to the fact that the five-year requirement included in the standard condition is more stringent, this is the requirement that has been included in the appropriate MRRR's. However, the conditions included in the NOC permit still applies to the permittee and therefore have been included in the AOP under the column labeled Condition, Emission Standard, or Work Practice. The specific conditions that this applies to are listed below.
- b) WAC 173-401-620(1) – Acid Rain Provisions. The permittee is not an affected party as specified in the referenced section of the WAC. Due to this, no permit conditions relating to the acid rain provisions of the FCAA have been included in the AOP.
- c) AC 173-401-510(2)(h)(i) – Compliance Plan. At the time of permit issuance, no ongoing applicable requirements have been identified with which the permittee is not currently in compliance. However, this does not preclude Ecology from taking future action on past non-compliance.
- d) Chapter 173-425 WAC, Open Burning – The requirements restricting open burning in the State of Washington apply to the source, and therefore Chapter 173-425 has been included as an applicable requirement under Section 2(a) Facility Wide Requirements.
- e) Visual Emissions – These surveys are to be performed as the monitoring method by which a reasonable assurance of compliance is obtained. In some cases, as in Condition 2.1.2 of the AOP, the "Testing" column of the AOP includes a reference to the EPA reference test method. The testing column is not intended to imply that personnel must be certified in those test methods in order to be eligible to perform the visual survey. The purpose of the testing column is simply to clarify the reference test method which would be used were certified testing deemed necessary. As a specific example, plant personnel are not required to be RM 9 or RM 9A certified in order to perform the visual survey required.

18. Comments and Corresponding Responses

Any Comments received during the public comment period and EPA review period are on file at Ecology's Eastern Region Office in Spokane, along with Ecology's response to the comments.

