NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date:

Region: Asheville Regional Office
County: Buncombe
NC Facility ID: 1100542
Inspector's Name: Mike Parkin
Date of Last Inspection: 04/12/2018
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): Buncombe County Landfill II

Facility Address:
Buncombe County Landfill II
81 Panther Branch Road
Alexander, NC 28701

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: 15 NCAC 02D .0516, .0521, .1806
NSPS: 15 NCAC 02D .0524 – Subpart WWW, Subpart JJJJ
NESHAP: ZZZZ, CCCCCC
PSD: NA
PSD Avoidance: NA
NC Toxics: NA
112(r): NA
Other: NCGS 62-133.8(g) State BACT

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Kristy Smith Solid Waste Manager (828) 250-5460 81 Panther Branch Road Alexander, NC 28701	Dane Pedersen Buncombe Co. Solid Waste Director (828) 250-5460 81 Panther Branch Road Alexander, NC 28701	Kristy Smith Solid Waste Manager (828) 250-5460 81 Panther Branch Road Alexander, NC 28701

Application Data

Application Number: 1100542.19A
Date Received: 03/01/2019
Application Type: Renewal
Application Schedule: TV-Renewal

Existing Permit Data

Existing Permit Number: 10398/T01
Existing Permit Issue Date: 09/01/2016
Existing Permit Expiration Date: 11/30/2019

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	0.7100	5.18	2.91	12.14	1.68	10.62	7.23 [Formaldehyde]
2016	0.7300	10.31	5.49	31.96	1.59	2.97	0.9398 [Toluene]
2015	0.7700	12.32	6.57	32.10	1.69	2.40	0.7971 [Toluene]
2014	0.9800	9.62	6.01	31.58	1.54	2.27	0.7467 [Toluene]
2013	0.9500	10.22	5.94	26.78	1.54	2.19	0.7230 [Toluene]

Review Engineer: Eric Crump

Review Engineer's Signature: **Date:**

Comments / Recommendations:
Issue 10398/T02
Permit Issue Date:
Permit Expiration Date:

1. Purpose of Application

Buncombe County Landfill II (BCL-II) is a municipal solid waste (MSW) landfill located in Alexander, Buncombe County, North Carolina. The facility operates under Title V Permit No. 10398/T01 with an expiration date of November 30, 2019. The Buncombe County Solid Waste Department (BCSWD) has applied for renewal of their facility's air quality permit. The renewal application was received on March 1, 2019, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description

The BCSWD has operated BCL-II **(ID No. ES-C1)** —a 121-acre RCRA (40 CFR 258) Subtitle D MSW landfill—since October 1997. BCL-II has a design capacity of approximately 3.17 million megagrams (Mg) and 3.16 million cubic meters (m^3) of refuse and is estimated to provide 35 years of operation. Because the design capacity exceeds 2.5 million Mg and 2.5 million m^3 of refuse, the landfill is regulated as a Title V source under the municipal landfill new source performance standard (NSPS) – 40 CFR Part 60, Subpart WWW, "Standards of Performance for Municipal Solid Waste Landfills," Section 60.752(c). The landfill operates 7:30 a.m. - 4:30 p.m., Monday through Friday, and a half-day on Saturday.

BCSWD completed construction of a 1.4-megawatt landfill gas-to-energy project **(ID No. CD-GCCS1)** at the site in November 2011. Because the gas collection system has not exceeded the municipal landfill NSPS thresholds that would require a gas collection system (greater than 2.5 million Mg by mass, greater than 2.5 million m^3 by volume, <u>and</u> annual non-methane organic compound (NMOC) emissions greater than 50 Mg per year (Mg/yr), its operation is strictly voluntary. The collection system is comprised of:

- 25 vertical gas wells;
- a GE/Jenbacher Model JGS 420 electrical generator set **(ID No. ES-G1)** with a maximum rated heat input capacity of 17 million British thermal units per hour (MMBtu/hr), engine output capacity of 1,966 horsepower, and a generator output capacity of 1,466 kilowatts; and
- a two-stage candlestick-type flare **(ID No. CD-1)** with variable flow rates of 300 actual cubic feet per minute (acfm) and 3,000 acfm (45 MMBtu/hr heat input capacity).

The system collects gas produced from the decomposition of solid waste, and conveys the gas to the generator set, which uses the gas as fuel. The generator set operates around the clock unless there are problems. The generator produces 1.4 megawatts of electricity each day, enough to power 1100 homes. When the generator is down, the landfill gas is vented to the flare.

In addition, leachate from the landfill is recirculated through the landfill over a 3-to-4-hour period, 2-to-3 days a week from April through December. The recirculation raises the moisture content of the solid waste, promoting waste decomposition and extending the life of the landfill.

BCL-II was approved by the Climate Action Reserve to register carbon credits for the capture and destruction of methane emitted from the landfill. According to the 2018 Mid-Year Progress Report for the EPA Project XL, the County has registered 129,940 tons of carbon credits from 2012 and 2016, which is equivalent to offsetting emissions from 29,942 passenger vehicles. No carbon credits were issued in 2017, and BCL-II is no longer recording carbon credits.[1] Landfills with bioreactor-type systems are typically not allowed to sell carbon credits since they are required by regulation to operate gas collection and control systems and projects must be voluntary to be eligible for credits. This landfill with leachate only circulation does not meet the definition of a bioreactor in the federal EPA MACT rules.

[1] CDM Smith. (2018). USEPA Project XL Buncombe County Bioreactor Project; 2017 Year-End Progress Report.

In addition to BCL-II, the BCSWD operates a construction and demolition landfill, wood waste mulching facility, a residential solid waste drop-off convenience center, a household hazardous waste facility, and a white goods and tires holding facility at this location. None of these operations contribute significantly to overall emissions.

3. Application Chronology

December 5, 2014	Air Permit No. 10398T00 issued for BCL-II.
April 2, 1015	BCSWD submits test protocol for emissions testing of landfill gas-fired engine/generator set (**Source ID No. ES-G1**) to North Carolina Division of Air Quality (DAQ).
April 13, 2015	DAQ approves test protocol for emissions testing of engine/generator set (**ID No. ES-G1**).
April 23, 2015	Compliance inspection and stack test observation for engine/generator set (**ID No. ES-G1**) conducted by Mike Parkin and Brendan Davey, Asheville Regional Office (ARO). Facility appeared to be operating in compliance with all permit requirements.
July 8, 2015	DAQ issues review of stack test results for engine/generator set (**ID No. ES-G1**). While the testing and the results were found to be acceptable, compliance with the permitted State BACT limit for nitrogen oxide (NO_x) emissions was not indicated.
July 29, 2015	Notice of Violation issued to BCL-II for exceeding the NO_x emission limit.
March 22, 2016	BCSWD submits 502(b)(10) notification (application No. 1100542.16A) to DAQ as a 502(b)(10) for replacement of engine/generator set (**ID No. ES-G1**).
March 29, 2016	DAQ acknowledges receipt of 502(b)(10) notification.
April 13, 2016	BCSWD submits updated 502(b)(10) notification to DAQ clarifying that instead of replacing engine/generator set (**ID No. ES-G1**), parts of the engine were replaced or repaired.
April 28, 2016	DAQ sends letter to BCSWD approving test protocol for emissions testing of replacement landfill gas-fired engine/generator set (**ID No. ES-G1**).
April 29, 2016	DAQ receives application No.1100542.16B from BCSWD to modify the BACT limit in the BCL-II permit.
May 19, 2016	Compliance inspection and stack test observation for engine/generator set (**ID No. ES-G1**) conducted by Mike Parkin, ARO. Facility appeared to be operating in compliance with all permit requirements.
September 1, 2016	Air Permit No. 10398T01 issued for BCL-II.
September 2, 2016	DAQ sends letter informing BCSWD of promulgation of 40 CFR Part 60 Subpart XXX, (New Source Performance Standards, Standards of Performance for Municipal Solid Waste Landfills) in the event that BCL-II facility was subject to Subpart XXX requirements.

September 2, 2016	DAQ sends letter to BCSWD approving Tier 2 testing protocol for non-methane organic compound emissions at the BCL-II to determine if a landfill gas collection and control system is required.
September 27, 2016	Memo from Gregg O'Neal, Stationary Source Compliance Branch (SSCB), DAQ to Brendan Davey, ARO stating the stack test results for engine/generator set (**ID No. ES-G1**) conducted on May 19, 2016 were acceptable. Compliance with 40 CFR 60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) is indicated.
October 10, 2016	DAQ sends letter informing BCSWD that the emission testing results from the EPA Methods M7E, M10, and M25A for NO_x, carbon monoxide (CO), and volatile organic compounds (VOC) on Source ID No. ES-G1 conducted on May 19, 2016 were acceptable. Permit testing requirements were satisfied.
March 7, 2017	Letter sent to BCSWD that DAQ has approved the EPA Methods 7E, 10, and 25A emissions testing protocol for landfill gas-fired engine/generator set (**ID No. ES-G1**).
June 26, 2017	Memo from Brent Hall, SSCB, DAQ to Brendan Davey, ARO stating the emission testing results from EPA Methods M7E, M10, and M25A for NOx, CO, VOC, and formaldehyde (CH_2O) on the engine generator set (**ID No. ES-G1**) were acceptable. Compliance is indicated.
July 12, 2017	Compliance inspection conducted by Mike Parkin, ARO. Facility appeared to be operating in compliance with all permit requirements.
March 26, 2018	DAQ sends letter to BCSWD approving test protocol for emissions testing of landfill gas-fired engine/generator set (**ID No. ES-G1**).
April 12, 2018	Compliance inspection and stack test observation of engine/generator set (**ID No. ES-G1**) conducted by Mike Parkin, ARO. Facility appeared to be operating in compliance with all permit requirements.
May 15, 2018	SSCB issues memorandum documenting that the results of the Tier 2 landfill emissions testing (performed on September 8, 2016 and October 7, 2016) were acceptable for use in modeling emissions from BCL-II. Tier 2 compliance was indicated by the modeling results for the landfill for the next five years.
May 24, 2018	Letter from DAQ to BCSWD informing them the Tier 2 landfill emissions testing results were acceptable.
September 11, 2018	Memo from Gregg O'Neal, SSCB, DAQ to Brendan Davey, ARO stating the stack test results for the engine/generator set (**ID No. ES-G1**) conducted on April 12, 2018 were acceptable. Compliance with 40 CFR 60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) is indicated.
March 3, 2018	Letter from DAQ to BCSWD acknowledging receipt of permit renewal application No. 1100542.19A on March 1, 2019.

4. Permit Modifications and Title V Equipment Editor (TVEE) Discussion

The following table summarizes changes to the Buncombe County Landfill II permit resulting from the permit renewal:

Page No.	Section	Description of Changes
Cover and throughout	---	Updated all dates and permit revision numbers
Insignificant Activities List	---	Added "**GACT CCCCCC**" to Source ID No. IES-01
4	2.1 A.2 2.1 A.2.b 2.1 A 3	Deleted "-START HERE" from title of section Deleted "15A NCAC 02D .0501(c)(8) and" between the words "with" and "General" Updated section title to latest permit shell version
5	2.1 A 3.a 2.1 A.3.b.i 2.1 A.3.b.iii 2,1 A.3.c	Deleted "[15A NCAC 02D .0524]" Changed "NMOC" to "non-methane organic compound (NMOC)" Modified subparagraph to incorporate 40 CFR Part 63 Subpart WWW Tier 3 testing requirements Added references to 40 CFR 60.753, 60.755, 60.756, 60.757, and 60.759 to subparagraph title
6	2.1 A.3.c.iii.(A)(4) 2.1 A.3.d	Replaced clause with language from 40 CFR §60.752(b)(iv) Removed reference to 40 CFR 60.756 from subparagraph title
7	2.1 B.2.b	Deleted "15A NCAC 02D .0501(c)(8) and" between the words "with" and "General"
11	2.1 B.3 2.1 B.3.b 2.1 B.3.e	Added "for 40 CFR 60 Subpart JJJJ" to section title Inserted "ID No. ES-G1" after the words "internal combustion engine" Changed "Stationary" to "The stationary" Changed "(ppmvd)" in the exhaust emission standard for CO to "parts per million volume, dry (ppmvd)" Changed "Stationary" to "The stationary" Changed "engines" to "engine ID No. ES-G1" after the words "internal combustion engine" Changed the acronym "ICE" to "internal combustion engines"
14-23	3	Updated General Conditions to version 5.3 dated 8/21/2018

The following change was made to the Title V Equipment Editor (TVEE):

> The description of Source ID No. IES-01, "One storage tank with two compartments (one compartment that stores 10,000 gallons of off road Diesel fuel, and one compartment that stores 2,000 gallons of gasoline)" was changed to "One storage tank with two compartments (one 10,000-gallon compartment that stores off road Diesel fuel, and one 2,000 gallon compartment that stores gasoline) [GACT CCCCCC]".

5. Description of Changes and Estimated Emissions

There have been no modifications to the landfill, generator set, or flare since the last permit issuance that resulted in changes to potential emissions from the landfill. However, because BCL-II is an active solid waste landfill, emissions will vary from year to year as a function of the amount of waste stored, the age of the waste

stored in the landfill, and the rate of waste decomposition. Facility emissions will be discussed in more detail in Section 12 below.

6. Regulatory Review

The landfill, gas collection and control system, flare, and engine/generator set remain subject to the following regulations:

Sources	Regulations
Municipal solid waste landfill (**ID No. ES-C1**), with: • Landfill gas collection and control system (**ID No. CD-GCCS1**) • Two-stage landfill gas-fired candlestick type flare with variable 300/3000 scfm maximum flow rate (**ID No. CD-1**)	02D .0516: Sulfur Dioxide Emissions from Combustion Sources 02D .0521: Control of Visible Emissions 02D .1806: Control and Prohibition of Odorous Emissions
Landfill gas-fired engine/generator set (**ID No. ES-G1**) (engine = 1966 hp, 17 mmBtu/hr heat input capacity and generator = 1466 kW output capacity)	02D .0516: Sulfur Dioxide Emissions from Combustion Sources 02D .0521: Control of Visible Emissions

All permit conditions have been reviewed and modified, if necessary, to the most current set of shell permit conditions. Continued compliance is expected.

7. Maximum/Generally Achievable Control Technology (MACT/GACT) Standards

At this time, BCL-II is not subject to the municipal landfill MACT standard (40 CFR Part 63, Subpart AAAA: National Emission Standards for Hazardous Air Pollutants from Municipal Solid Waste Landfills) because it is not currently a major source of HAPs (greater than 10 tons per year (tpy) of a single HAP or 25 tpy of multiple HAPs), and the NMOC emission rate from the landfill does not exceed 50 Mg/yr. Furthermore, the leachate recirculation project at the landfill does not meet the definition of a bioreactor in the standard, because the landfill only recirculates leachate—no other liquids are added to accelerate and enhance the anaerobic biodegradation of the waste.

The landfill gas-fired engine/generator set (ES-G1) is subject to 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). Because the engine/generator set is a new stationary spark ignition RICE located at an area source, it must meet Subpart ZZZZ requirements by meeting the requirements of 40 CFR Part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

On March 22, 2016, BCSWD submitted a 502(b)(10) notification to replace the landfill gas-fired engine/generator set. Because the new engine/generator set was the same make, model, and capacity as the original, this modification did not increase or decrease potential emissions at the landfill. There have been no revisions to Subparts ZZZZ and JJJJ that required revisions to the permit. Continued compliance is expected.

BCL-II has a storage tank onsite (ID No. IES-01) with two compartments: one that stores 10,000 gallons of off-road diesel fuel, and one that stores 2,000 gallons of gasoline. The gasoline storage compartment is subject to the NESHAP for Gasoline Dispensing Facilities (GDF), 40 CFR 63 Subpart CCCCCC. This regulation applies to GDF located at area sources of HAPs. BCL-II fills the gasoline compartment about once a year, so the annual gasoline throughput is approximately 2,000 gallons of gasoline each year. The facility must comply with requirements under 40 CFR 63.11116, which include minimization and expeditious cleanup of spills, and other measures to prevent vapor releases for extended periods. This emission source is also considered an insignificant

activity under 15A NCAC 02Q .0503(8). Section 1 of the permit and TVEE will be revised to note that Tank IES-01 is subject to Subpart CCCCCC. No additional changes to the permit are needed under this permit renewal, and continued compliance is anticipated.

8. New Source Performance Standards (NSPS)

As discussed above in Section 7, BCL-II is subject to the requirements 40 CFR Part 60, Subpart JJJJ, because it is an area source subject to 40 CFR Part 63 Subpart ZZZZ, the MACT standard for Stationary RICE.

As discussed in Section 2 of this review, BCL-II is subject to 40 CFR Part 60, NSPS Subpart WWW due to its design capacity.

9. New Source Review (NSR)/Prevention of Significant Deterioration (PSD)

Buncombe County, where BCL-II is located, is not a nonattainment area, so the landfill is not subject to NSR. However, North Carolina General Statute (GS) 62-133.8(g) requires a biomass combustion process at any new renewable energy facility that delivers electric power to an electric power supplier to meet Best Available Control Technology (BACT). Best Available Control Technology (BACT) is an emissions limitation based on the maximum degree of reduction in the emission of air pollutants achievable for a facility, taking into account energy, environmental, and economic impacts and other costs.

As stated in GS 62-133.8(g), the Environmental Management Commission shall determine on a case-by-case basis the BACT for a facility that would not otherwise be required to comply with BACT pursuant to the Prevention of Significant Deterioration (PSD) emissions program. The facility submitted a BACT analysis in 2011 when their Title V air permit was under the jurisdiction of the Western North Carolina Regional Air Quality Agency (Air Permit No. 11-542-10A). When the permit was transferred to NC DAQ and issued December 5, 2014 as Air Permit No. 10398T00, the BACT requirement for $PM_{10}/PM_{2.5}$was changed from "shall not exceed 0.24 grams per horsepower–hour (g/hp-hr)" to "$PM_{10}/PM_{2.5}$ shall be controlled using good combustion practices and the burning of landfill gas in the engine". On April 29, 2016, the facility submitted application No. 1100542.16B, requesting modification of BACT limits for CO and NOx. As a result, Air Permit No. 10398T01 was issued September 1, 2016, in which the current levels of BACT for the engine/generator set ES-G1 were established as equal to the NSPS Subpart JJJJ limits for these pollutants. These current limits are shown in the table below.

Pollutant	Level of BACT Control Required
Carbon Monoxide (CO)	5.0 g/hp-hr or 610 parts per million by volume, dry (ppmvd) at 15% O_2
Nitrogen Oxide (NO_X)	2.0 g/Hp-hr or 150 ppmvd at 15% O_2
Volatile Organic Compounds (VOC)	1.0 g/Hp-hr or 80 ppmvd at 15% O_2
NO_X, CO, $PM_{10}/PM_{2.5}$, Sulfur Dioxide, VOC, Lead, and Mercury	Good combustion practice and firing of landfill gas in the engine

BCL-II appears to be meeting the current BACT emission limits. Continued compliance is expected.

10. Risk Management Program (Clean Air Act, Section 112(r))

40 CFR Part 68 establishes requirements for stationary sources that hold more than threshold quantities of regulated substances. These sources must develop a risk management plan (RMP) in accordance with Section 112(r) of the 1990 Clean Air Act Amendments. A RMP identifies the potential effects of a chemical accident,

steps the facility is taking to prevent such accidents, and emergency response procedures to be followed if an accident should occur.

The BCL-II facility does not hold more than threshold quantities of regulated substances, so it is not subject to the Risk Management Program requirements. This permit renewal does not affect this status.

10. Compliance Assured Monitoring (CAM)

40 CFR Part 64 establishes requirements for compliance assurance monitoring (CAM). This rule applies to any pollutant specific unit that meets the following three conditions:

- the unit is subject to any (non-exempt: e.g. pre-November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- the pre-control potential emission rate for the unit exceeds either 100 tons per year for criteria pollutants, 10 tons per year of a single HAP, or 25 tons per year of multiple HAPs.

CAM was determined in a preceding permit review to not be applicable because potential pre-controlled emissions (particulate) were less than CAM thresholds. The permit renewal does not affect the facility's status with respect to compliance assurance monitoring (CAM).

11. Facility-wide Air Toxics

In the preceding permit review (B. Pullen, September 3, 2014) explained that BCL-II was not triggered for a toxic air pollutant evaluation for these reasons:

- The combustion sources at this facility were permitted in 2009—exempting them under the combustion exemption in 15A NCAC 2Q .0702(a)(18).
- Prior to the July 10, 2010 toxic air pollutant regulation revision, the landfill would have only been subject to a facility-wide toxics evaluation when the landfill became subject to the last MACT standard—the municipal landfill MACT (40 CFR 63 Subpart AAAA). BCL-II had never been subject to the landfill MACT—and will not be until the site is required to install a gas collection and control system per NSPS Subpart WWW, or the leachate recirculation system at the site qualifies as a bioreactor.
- The previous permit renewal (Application No. 1100542.14A) included no modifications that would trigger requirements for an air toxics evaluation.

These reasons remain valid justification for not performing a toxic air pollution evaluation for BCL-II at this time. Continued compliance is expected.

12. Facility Emissions Review

The table on the header page of this review summarizes actual annual emissions for BCL-II after application of required emission controls. In 2016, 2.97 tons of HAP were emitted at the BCL-II facility, with toluene being the largest individual HAP emitted (0.9398 tons). In 2017, total HAP emissions increased to 10.62 tons, with formaldehyde (HCHO) being the largest individual HAP emitted—7.23 tons from the engine/generator set (this increase in HCHO emissions is largely due to a recent change in the DAQ emission factor for HCHO). BCL-II's permit renewal application estimates a potential to emit 9.53 tons of HCHO per year from the engine/generator set, which is much closer to the major source threshold of 10 tons per year of a single hazardous air pollutant.

At this time, the BCL-II facility remains an area source. If HAP emissions increase, the BCL-II facility would become a major source of HAP emissions, and would then be subject to the MACT standards for municipal

solid waste landfills (40 CFR 63.1935(a)(1)). The landfill gas collection system voluntarily operated by BCL-II would then become mandatory.

Because BCL-II is an area source landfill with a design capacity greater than 2.5 million Mg and 2.5 million m^3 by volume, it would be subject to the municipal landfill MACT if its annual NMOC emissions equaled or exceeded 50 Mg/yr (40 CFR 63.1935(a)(3)). According to the annual NOMC report BCL-II submitted on January 25, 2019, the NMOC emission rate for the landfill was 19.56 Mg/yr. The BCL-II landfill is therefore not subject to the municipal landfill MACT standard at this time.

13. Compliance Status

The facility was last inspected on April 12, 2018 by Mike Parkin of the Asheville Regional Office. The company appeared to be in compliance with all applicable requirements at that time.

On July 29, 2015, a Notice of Violation was issued to BCL-II for exceeding the NO_x emission limit. On March 22, 2016, BCSWD submitted a 502(b)(10) notification to NC DAQ to replace the existing landfill gas-fired engine/generator set (Source ID No. ES-G1) to NC DAQ. NC DAQ approved the emissions test protocol for the new engine/generator set on April 28, 2016. On September 27, 2016, NC DAQ declared the stack test results for Source ID No. ES-G1 conducted on May 19, 2016 were acceptable, and that compliance with. Compliance with 40 CFR 60 Subpart JJJJ is indicated. No violations since the stack test was conducted have been observed. Continued compliance is anticipated.

14. 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 pursuant 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 is provided to the public under 02Q .0521 above. Tennessee and South Carolina are affected states within 50 miles of the facility, and the Western North Carolina Regional Air Quality Agency is an affected local program.

15. Other Regulatory Considerations

A P.E. seal was not required for Permit Application No. 1100542.19A.

A zoning consistency determination dated February 28, 2019 was obtained from the Buncombe County Planning and Development Department for Permit Application No. 1100542.19A. The Buncombe County Landfill II and this permit renewal are consistent with applicable zoning ordinances.

A permit fee was not required for Permit Application No. 1100542.19A.

16. Recommendations

The permit application(s) for Buncombe County Landfill II located in Alexander, Buncombe County, North Carolina 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. 10398T02.