

Application Review

Issue Date: xx/xx/2020

Region: Mooresville Regional Office
County: Iredell
NC Facility ID: 4900311
Inspector's Name: Karyn Kurek
Date of Last Inspection: 03/17/2020
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Iredell County Landfill</p> <p>Facility Address: Iredell County Landfill 354 Twin Oaks Road Statesville, NC 28625</p> <p>SIC: 4953 / Refuse Systems NAICS: 562212 / Solid Waste Landfill</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0524, .1110, and .1806 NSPS: Subpart XXX NESHAP: 40 CFR 61, Subpart M PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>David Lambert Solid Waste Director (704) 878-5430 354 Twin Oaks Rd. Statesville, NC 28625</p>	<p style="text-align: center;">Authorized Contact</p> <p>Beth Jones County Manager (704) 878-3050 PO Box 788 Statesville, NC 28687</p>	<p style="text-align: center;">Technical Contact</p> <p>David Lambert Solid Waste Director (704) 878-5430 354 Twin Oaks Rd. Statesville, NC 28625</p>	<p>Application Number: 4900311.19A, 4900311.20A Date Received: 11/05/2019, 01/27/2020 Application Type: Modification and Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 09959/T02 Existing Permit Issue Date: 11/03/2015 Existing Permit Expiration Date: 10/31/2020</p>

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2019	---	---	4.49	---	---	1.86	0.7234 [Toluene]
2018	---	---	5.33	---	---	0.9312	0.4477 [Toluene]
2017	---	---	1.12	---	---	0.4753	0.2445 [Toluene]
2016	---	---	2.75	---	---	1.80	0.6442 [Toluene]
2015	---	---	2.66	---	---	1.73	0.6177 [Toluene]

<p>Review Engineer: Joshua L. Harris</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 09959/T03 Permit Issue Date: xx/xx/2020 Permit Expiration Date: xx/xx/2025</p>
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1. Purpose of Application

The Iredell County Landfill is an active municipal solid waste (MSW) landfill located in Statesville, Iredell County, North Carolina. The facility has submitted the following applications:

- Application No. 4900311.19A – This application was made for a 1-Step Significant Modification to the landfill's Title V air permit to include conditions for the recently triggered NSPS Subpart XXX. The application was received on November 5, 2019 and was considered complete on that date.
- Application No. 4900311.20A – This application is being made for renewal of the landfill's current Title V Air permit. The application was received on January 27, 2020 and was considered complete on that date.

These applications will be consolidated under Application No. 4900311.20A and will go through the 30-day public notice and 45-day EPA review periods prior to issuance.

The facility contact for this application is David Lambert, Solid Waste Director, (phone: 704-878-5430). A consultant, Carlson Environmental Consultants, PC (CEC), was used for this application. The contact at CEC is Amanda Higgs, Environmental Scientist, (phone: 980-425-1306).

2. Facility Description

The Iredell County Landfill currently operates under Solid Waste Permit No. 49-03, and consists of an active MSW landfill, and a closed construction and demolition (C&D) waste disposal site. The MSW landfill has six permitted Phases, with Phase 6 being the most recent Phase to be approved for construction by the Solid Waste Section. Iredell County commenced construction on the Phase 6 expansion on October 3, 2019, triggering applicability of NSPS XXX. A voluntary landfill gas collection and control system (GCCS) was previously installed for collection and subsequent beneficial use of the gas for energy production. The collected gas is sent to a third-party landfill gas-to-energy (LFGTE) facility, Iredell Transmission, LLC (Facility ID 4900262, Permit No. 08634) which owns and operates a flare, LFG treatment system and two landfill gas-fired engines rated at 2,233 HP each.

3. Application Chronology

- 11/05/19 The Division of Air Quality (DAQ), Mooresville Regional Office (MRO), received Application No. 4900311.19A, submitted for a Significant Modification, and forwarded a copy to the Raleigh Central Office (RCO). The application contained the required forms, and there was no request for confidentiality. No fees were required since the application was made due to a regulatory change. The application appeared to be complete for processing.
- 11/08/19 RCO received the application and sent the facility a letter acknowledging receipt of the complete permit modification application.

- 01/27/20 The Division of Air Quality (DAQ), Mooresville Regional Office (MRO), received Application No. 4900311.20A, submitted for Renewal, and forwarded a copy to the Raleigh Central Office (RCO). The application contained the required forms, and there was no request for confidentiality. No fees were required. The application appeared to be complete for processing.
- 01/30/20 RCO received the application from MRO.
- 01/31/20 RCO sent the facility a letter acknowledging receipt of the complete permit renewal application.
- 03/06/20 Joshua Harris sent an email with questions regarding calculations made using WIAC concentrations mixed in with AP-42 concentrations, and ownership of the GCCS. Mr. Harris also requested additional information required for DAQ to complete toxics modeling for the facility.
- 03/25/20 Amanda Higgs replied stating that the GCCS is owned by Iredell County, but that flare and treatment system are owned by Iredell Transmission, LLC. She also updated the calculations to use AP-42 as opposed to WIAC concentrations, and provided the necessary information for DAQ to conduct toxics modeling.
- 08/05/20 Matt Porter, AQAB, completed toxics modeling for the facility.
- 08/10/20 Joshua Harris sent electronic copies of the draft permit and review documents to Booker Pullen, Samir Parekh, and Bruce Ingle for comments. The Mooresville Regional Office did not respond to the request for comments.
- 08/17/20 Booker Pullen responded with minor editorial comments.
- 08/18/20 Samir Parekh responded stating he had no comments.
- 08/25/20 Joshua Harris sent electronic copies of the draft permit and review documents to Beth Jones, David Lambert, and Amanda Higgs for comments.
- 09/10/20 Emails were exchanged between Joshua Harris and Amanda Higgs regarding
And comments on the draft permit document. Ms. Higgs' comments included questions
09/11/20 regarding the listing of the GCCS as a control device, along with minor typographical
comments. Mr. Harris replied to Ms. Higgs stating the reason that the GCCS is
commonly listed in landfill permits and corrected typographical errors. Ms. Higgs
replied with no additional comments.
- Xx/xx/20 30-day public notice and 45-day EPA review periods begin.
- Xx/xx/20 Public notice period ends; [comments received].
- Xx/xx/20 EPA review period ends; [comments received].
- Xx/xx/20 Air Quality Permit Revision No. 09959T03 issued.

4. **Table of Changes to Existing Permit No. 09959T02**

Page No.	Section	Description of Changes
Cover and Throughout	Cover and Throughout	<ul style="list-style-type: none"> • Updated letterhead. • Updated permit revision numbers and dates throughout. • Updated Responsible Official.
Attachment to Cover	Attachment to Cover	<ul style="list-style-type: none"> • Removed gasoline storage tanks (ID No. IES-05) from the insignificant activities list. • Added miscellaneous storage tanks, drums and containers as insignificant source ID No. IES-08. • Included updated URL for DAQ MACT/GACT guidance website.
3	1	<ul style="list-style-type: none"> • Updated NSPS and NESHAP citations to show that the landfill (ID No. ES-01) is subject to NSPS XXX and 40 CFR 61 Subpart M. • Removed note stating that the gas collection and control system, (ID No. GCCS-1) is owned by a third-party. The system is owned by Iredell County. • Updated the description of the flare (ID No. CD-1) to match the description of source in the permit of Iredell Transmission, LLC (Permit No. 08634), which owns and operates the flare.
3	2.1 A.	<ul style="list-style-type: none"> • Updated table to cite NSPS XXX and its requirements for NMOC emissions. • Inserted row for asbestos and the requirements of 40 CFR 61, Subpart M.
4-14	2.1 A.1.	Removed conditions for NSPS WWW and replaced with conditions for NSPS XXX.
15-16	2.1 A.2.	Inserted condition for 15A NCAC 02D .1100, 40 CFR 61, Subpart M.
16	2.1 A.3.	Renumbered conditions for 15A NCAC 02D .1806.
16	2.2 A.(3)	Updated cross reference for NMOC calculations.
17	3	Updated General Conditions to the latest version (version 5.5, 08/25/2020).

5. Changes in Equipment

- Removed gasoline storage tanks (ID No. IES-05) from the insignificant/exempt activities list. The application states that there are no gasoline tanks on site.
- Added miscellaneous storage tanks, drums and containers as insignificant source IES-08.
- Updated the description of the flare (ID No. CD-1) to match the description in the permit of the owner and operator, Iredell Transmission, LLC (Permit No. 08634).

The facility's permitted emission sources are as follows:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-01 NSPS XXX 40 CFR 61 Subpart M	Municipal Solid Waste Landfill	GCCS-1	One landfill gas collection system
		CD-1*	One candlestick flare (1714 cfm, 36 million Btu per hour heat input at 350 Btu per cubic foot of landfill gas)
		CD-Treatment*	One landfill gas treatment system

*These sources are owned and operated by a third party, Iredell Transmission, LLC (Permit No. 08634)

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

Emission Source ID No.	Emission Source Description
IES-02	New and used oil storage tanks (less than or equal to 500 gallon capacity each)
IES-03	New and used hydraulic fluid tanks (less than or equal to 300 gallon capacity each)
IES-04	Diesel fuel (off-road and on-road) storage tanks (less than or equal to 5,000 gallon capacity each)
IES-06	One leachate pond (5,000,000 gallon capacity)
IES-07	Maintenance shop equipment
IES-08	Miscellaneous small tanks, drums, and containers (less than or equal to 500 gallon capacity each)

6. NSPS, NESHAP, PSD, 112(r), CAM & Attainment Status

- **NSPS** –
 - ✓ The MSW landfill (ID No. ES-01) is subject to 40 CFR 60, Subpart XXX, “Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification After July 17, 2014.” The facility commenced construction the Phase 6 lateral expansion on October 3, 2019, triggering applicability. Tier 2 sampling indicates that the NMOC emission rate exceeds 34 Mg/yr, therefore the landfill is subject to the requirements to install and operate a GCCS.
 - ✓ The MSW landfill (ID No. ES-01) is NOT subject to 40 CFR 60, Subpart WWW, “Municipal Solid Waste Landfills,” since it is superseded by NSPS subpart XXX.
- **NESHAP** –
 - ✓ The MSW landfill (ID No. ES-01) is NOT subject to 40 CFR 63, Subpart AAAA, “Municipal Solid Waste Landfills,” since the NMOC emission rate is below 50 Mg/yr. The landfill’s latest Tier 2 test results indicate that the 50 Mg/yr threshold will potentially be exceeded in CY2025. The permit contains a permit shield which states that the landfill will become subject to this regulation upon crossing the NMOC emission rate threshold.
 - ✓ The facility is subject to 40 CFR 61, Subpart M, “National Emission Standard for Asbestos,” since asbestos-containing waste is actively accepted.
- **PSD** – The facility’s potential emissions of criteria pollutants do not exceed PSD permitting thresholds.
 - ✓ Iredell County has triggered increment tracking under PSD for PM₁₀, SO₂, and NO_x. This permitting action is neither expected to consume nor expand any increments.
- **112(r)** – The facility does not store any of the listed 112(r) chemicals in amounts that exceed the threshold quantities. Therefore, the facility is not required to maintain a written Risk Management Plan (RMP).
- **CAM** – CAM does not apply since the facility is subject to NSPS Regulations that were promulgated after November 15, 1990, and control the pollutants that would be subject to CAM.
- **Attainment status** – Iredell County is in attainment for all criteria pollutants.

7. Regulatory Review

The facility is subject to the following air quality regulations in addition to the General Conditions:

- 15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart XXX
- 15A NCAC 02D .1110: National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart M
- 15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions

Although landfill gas is collected and routed to a flare or LFG-fired engine, the Iredell County Landfill does not own or exercise operational control over these sources, therefore 15A NCAC 02D .0516 “Sulfur Dioxide Emissions from Combustion Sources” and .0521 “Control of Visible Emissions” regulations do not apply.

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

The MSW landfill (ID No. ES-01) is subject to NSPS Subpart XXX, which was recently triggered on October 3, 2019, when the landfill commenced construction on the Phase 6 expansion. The application indicated the NMOC emission rate will exceed 34 Mg/yr, and the facility elected not to conduct Tier 2 testing since previous testing that was conducted when the landfill was subject to NSPS WWW demonstrated the NMOC emission rate for CY2019 to be 41.4 Mg/yr.

The initial NMOC emission rate report submitted for compliance with NSPS XXX was dated December 30, 2019, therefore the landfill is required to submit the GCCS design plan no later than December 30, 2020, and is required to install and begin operating the GCCS no later than June 30, 2022. Although the LFG is routed to a flare and treatment system that is owned and operated by a third party, the flare is still required to be tested to demonstrate compliance with 40 CFR 60.18, and a treatment system monitoring plan must still be developed. The landfill appears to be working through the compliance timeline without any issues. Continued compliance is expected.

15A NCAC 02D .1110: National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart M:

The facility is an active disposal site for asbestos-containing wastes; therefore, it is subject to the requirements of this regulation. To comply, the facility must adhere to a general set of work practices which may include ensuring there are no visible emissions at the disposal site, covering waste daily with at least six inches of compacted non-asbestos material or use another dust suppression agent, or the landfill may propose alternative methods for DAQ approval. The facility will be required to post signage and barriers if the method of compliance does not include covering the asbestos-containing waste. Closed portions of the landfill which have previously received asbestos-containing waste are also subject and are required to comply with the requirements of 40 CFR 61.151 for inactive waste disposal sites. The facility’s current Solid Waste permit contains a requirement for the facility to comply with the requirements of 40 CFR 61, Subpart M, and continued compliance is expected.

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

This is applicable facility wide. DAQ inspectors have not noted odors beyond the facility’s property boundary, and neither DAQ nor the facility have received any odor complaints from nearby residents. Continued compliance is expected.

8. Other Regulatory Requirements

- A Zoning Consistency Determination was submitted with the application. Rebecca Harper, Planner III of Iredell County Planning and Development determined that the proposed operation is consistent with applicable zoning ordinances.
- The applications were sealed by Kristofer L. Carlson, who is a registered Professional Engineer in the State of North Carolina (Seal #028334).
- No permit fees were required for these applications.

9. Air Toxics

The landfill is an active disposal site for asbestos containing wastes, and is subject to the requirements of 40 CFR 61, Subpart M. The landfill has requested to be exempt from permitting for 15A NCAC 02Q .0711 and 02D .1100 pursuant to 15A NCAC 02Q .0702(a)(27). The landfill submitted information required for DAQ to evaluate toxics and conduct modeling for those pollutants that exceed their respective TPERs through final buildout of the landfill. The potential volume emissions from the landfill surface (ID No. ES-01) were calculated using the methodology in AP-42 Chapter 2.4 (November 1998) and are based on a peak LFG generation rate of 33,077,486 m³/year projected through CY2039 as determined using LandGEM.

The following example calculation is for the emission of benzene from the landfill surface, which is generated as product of waste decomposition. [AP-42, Section 2.4.4.2 – Controlled Emissions]

- LFG Generation Rate = 33,077,486 m³/year (or 3,775.96 m³/hour)
- Methane is only 50% of this gas stream (1,887.98 m³/hour)
- Q_B = Emission rate of benzene, m³/hour
- C_B = Concentration of benzene (1.91 ppmv, AP-42 default value)
- Multiplication factor for 50% methane concentration in landfill gas = 2.0
- Molecular weight of benzene = 78.11 g/gmole

$$Q_B = 2.0 \times Q_{CH_4} \times \left(\frac{C_B}{1 \times 10^6} \right) \text{ (AP-42, Equation 3)}$$

$$Q_B = 2.0 \times 1,887.98 \frac{m^3}{hour} \times \left(\frac{1.91 \text{ parts}}{1 \times 10^6} \right) = 0.00721 \frac{m^3}{hour}$$

The mass of the pre-combustion chloride ions present in the methane were found using Equation 4 of AP-42, Section 2.4.4.2.

$$UM_B = 0.00721 \frac{\text{m}^3}{\text{hour}} \times \left[\frac{78.11 \text{ g/gmol} \times 1 \text{ atm}}{8.205 \times 10^{-5} \frac{\text{m}^3 \cdot \text{atm}}{\text{gmol} \cdot \text{K}} \times 1000 \frac{\text{g}}{\text{kg}} \times (273 + 37.8^\circ\text{C}) \text{ K}} \right] \times 2.205 \frac{\text{pounds}}{\text{kg}}$$

Where 37.8°C is a typical value for LFG temperature at this site, as stated in the application.

$$UM_B = 0.0487 \frac{\text{pounds}}{\text{hour}} = 426.61 \frac{\text{pounds}}{\text{year}}$$

The total emission rate is calculated using AP-42 Section 2.4-6 Equation 5:

$$CM_P = \left[UM_P \times \left(1 - \frac{\eta_{col}}{100} \right) \right] + \left[UM_P \times \frac{\eta_{col}}{100} \times \left(1 - \frac{\eta_{cnt}}{100} \right) \right]$$

Where:

CM_P = Controlled mass emissions of pollutant

UM_P = Uncontrolled mass emission of pollutant

η_{col} = Collection efficiency of the landfill gas collection system, percent (75%)

η_{cnt} = Control efficiency of the landfill gas control flare
 (98% for halogenated species; 99.7% for non-halogenated species [AP-42])

For this example, since the collected gas is routed to a flare that is owned and operated by a third-party, only the first term, which represents the emission rate from the landfill surface, is used, and the second term, which represents emission rates from a control device, is neglected. Therefore, Equation 5 is reduced to:

$$CM_P = \left[UM_P \times \left(1 - \frac{\eta_{col}}{100} \right) \right]$$

Therefore:

$$CM_B = \left[426.61 \frac{\text{lb}}{\text{yr}} \times \left(1 - \frac{75}{100} \right) \right] = 106.65 \frac{\text{pounds}}{\text{year}}$$

The emission rate above is slightly less than the emission rate listed in the following table. The emission rates listed in the table were calculated using all trailing digits, and were not rounded until the final values were reached.

The comparison to their respective TPERs from 02Q .0711(a) are as follows:

Toxic Air Pollutant	Averaging Period	Landfill Volume Emissions (CY2039)	TPER	Modeling Required?
1,1,1-Trichloroethane (methyl chloroform)	lb/day	0.13	250	No
	lb/hr	5.23×10^{-3}	64	No
1,1,2,2-Tetrachloroethane	lb/yr	133.22	430	No
1,1-Dichloroethene (vinylidene chloride)	lb/day	3.80×10^{-2}	2.5	No
1,2-Dibromoethane (ethylene dibromide)	lb/yr	0.13	27	No
1,2-Dichloroethane (ethylene dichloride)	lb/yr	29.01	260	No
2-Butanone (MEK)	lb/day	1.00	78	No
	lb/hr	4.17×10^{-2}	22.4	No
4-Methyl-2-pentanone (MIBK)	lb/day	0.37	52	No
	lb/hr	1.53×10^{-2}	7.6	No
Acrylonitrile	lb/day	0.66	0.4	YES
	lb/hr	2.74×10^{-2}	0.22	No
Benzene	lb/yr	106.67	8.1	YES
Carbon disulfide	lb/day	8.65×10^{-2}	3.9	No
Carbon tetrachloride	lb/yr	0.44	460	No
Chlorobenzene	lb/day	5.51×10^{-2}	46	No
Chloroform	lb/yr	2.56	290	No
p-Dichlorobenzene	lb/hr	2.52×10^{-3}	16.8	No
Dichloromethane (methylene chloride)	lb/yr	868.50	1600	No
	lb/hr	9.91×10^{-2}	0.39	No
Ethyl mercaptan	lb/hr	1.16×10^{-2}	0.025	No
n-Hexane	lb/day	1.11	23	No
Hydrogen Sulfide	lb/day	3.13	1.7	YES
Mercury vapor	lb/day	1.15×10^{-4}	0.013	No
Methanethiol (methyl mercaptan)	lb/hr	9.78×10^{-3}	0.013	No
Tetrachloroethylene (Perchloroethylene)	lb/yr	442.28	13000	No
Toluene	lb/day	7.09	98	No
	lb/hr	0.30	14.4	No
Trichloroethylene	lb/yr	264.93	4000	No
Vinyl chloride	lb/yr	328.02	26	YES
Xylene	lb/day	2.51	57	No
	lb/hr	0.10	16.4	No

The emission rates for acrylonitrile, benzene, hydrogen sulfide, and vinyl chloride exceed their respective TPERs. The facility requested that DAQ perform a dispersion modeling analysis, which was completed by Matt Porter, AQAB.

The following impacts at the property boundary resulted from the modeling demonstration:

Toxic Air Pollutant	Averaging Period	AAL ($\mu\text{g}/\text{m}^3$)	% AAL
Acrylonitrile	lb/day	30	4.47%
	lb/hr	1000	0.96%
Benzene	lb/yr	0.12	60.0%
Hydrogen Sulfide	lb/day	120	5.32%
Vinyl Chloride	lb/yr	0.38	58.2%

Since none of the toxic air pollutants exceeded the respective TPERs or AALs as evaluated, DAQ has determined that there is not an unacceptable risk to human health as a result of this modification. As previously stated, the 02D .1100 and 02Q .0711 conditions will not be included in the facility's permit pursuant to 15A NCAC 02Q .0702(a)(27). Emissions of toxic air pollutants should be periodically re-evaluated as the landfill grows.

10. Emissions Review

Pollutant	Potential After Controls / Limitations tons/yr	Potential Before Controls / Limitations tons/yr
PM (TSP)	-----	-----
PM ₁₀	-----	-----
PM _{2.5}	-----	-----
SO ₂	-----	-----
NOx	-----	-----
CO	-----	-----
VOC	10.37	4.04

A summary of the facility's actual emissions as reported annually on the AQEI can be viewed on the table on page one of this document.

Landfill emissions:

The surface emission rate for VOCs was projected through CY 2039, and was calculated in similar fashion as the example provided for benzene emissions in Section 9 above. The NMOC emission rate was calculated to be 10.37 tons per year, using 336.6 ppmv as the pollutant concentration as determined by the 2019 Tier 2 testing. AP-42 states that VOC emissions are 39% of NMOC emissions, therefore the VOC emission rate is 4.04 tons per year.

These values are projections and may fluctuate over time depending on a number of factors such as waste type, moisture, waste placement rates, etc., which can affect the NMOC concentration and LFG generation rates.

11. Statement of Compliance

The Iredell County Landfill has no negative compliance history. The last compliance inspection for this facility was conducted by Karyn Kurek, DAQ MRO, on March 17, 2020. Ms. Kurek found the landfill to be operating in apparent compliance with their Title V permit at that time.

12. Public Notice Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA.

The 30-day public notice period was from MONTH XX, 2020 through MONTH XX, 2020.

The EPA 45-day review period was from MONTH XX, 2020 through MONTH XX, 2020.

[Number of] comments were received during the public notice period and the EPA review period.

13. Comments and Recommendations

The permit renewal and modification application for the Iredell County Landfill located in Statesville, Iredell County, NC has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 09959T03.