Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Waste Management**	**AI #:**	**11767**	**TEMPO Activity No:**	**PER20070001**
Facility Name:	**Woodside Landfill and Recycling Center**	**Remarks Submitted by:**	**Serugudi Mani**		
Permit Writer:	**Qingming Zhang**	**Permit Writer Email address:**	**Qingming.zhang@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – *DO NOT COMPLETE THIS SECTION.* This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
1740-00025-V1	**Inspite of the Gas collection and flaring system in place, CRO gets odor complaints quite frequently. Specific Requirements 69 and 70 refer to LAC 33:III. Chapter 29 provisions for odor control and the facility has no way of measuring the odor intensity on the n-Butanol scale. I have bee raising objections to these provisions as only the legislature can repeal these. Until such time field people are not able to enforce these provisions.**	**The Chapter 29 requirements are deleted.**

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Company Name:	**Waste Management**	**AI #:**	**11767**	**TEMPO Activity No:**	**PER20070001**
Facility Name:	**Woodside Landfill and Recycling Center**	**Remarks Submitted by:**	**Tarek Elnaggar, PE**		
Permit Writer:	**Qingming Zhang**	**Permit Writer Email address:**	**Qingming.zhang@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

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Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Briefing Sheet III. Description	NON VOC TAPs Hydrogen Chloride and Hydrogen Sulfide were not included. As listed in Section 12 of the Revised Air Permit application: Hydrogen Chloride proposed emission rate is 12.819 Tons/yr and Hydrogen Sulfide proposed emission rate is 1.156 Tons/yr	In the Air Briefing Sheet, VOC TAPs are listed as VOC speciation. A list of Non-VOC TAPs is added below the VOC TAPs.
Statement of Basis II. Facility and Current Permit Status, Paragraph 1, page 1.	The facility also accepts commercial wastes. Revise second sentence to read as follows: "It receives a variety of non-hazardous solid wastes (including municipal solid waste such as residential and commercial solid waste, and industrial solid waste) which are disposed of by landfilling."	The facility description is updated as requested.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis II. Facility and Current Permit Status, Paragraph 2	The status of the current permit should be clarified. Revise the last sentence of Paragraph 2 to read as follows: "On August 22, 2007, the First Circuit Court of Appeal issued an opinion vacating the permit on the basis that the PCP exemption from PSD review for the Gas Collection and Control System at WLRC is not valid; an appeal of the Court of Appeal's decision by the facility is pending.	Language about the status of the current permit is revised to indicate that an appeal of the Court of Appeal's decision by the facility is pending.
Statement of Basis II. Facility and Current Permit Status, Paragraph 3	The October 19, 2007 application was a revised application submitted pursuant to LAC 33: III. 529. Revise Paragraph 3 to read as follows: "This permit reevaluated emissions from the facility and determined all applicable requirements to the facility based on the revised and updated Part 70 operating permit application submitted by Waste Management of Louisiana, L.L.C.	The word "updated" in the sentence is removed. The sentence reads as follows: This permit reevaluated emissions from the facility and determined all applicable requirements to the facility based on the Part 70 operating permit application submitted by Waste Management of Louisiana, L.L.C.
Statement of Basis III. Proposed Project/ Permit Information, Application	The October 19, 2007 application was a revised application submitted pursuant to LAC 33: III. 529. Revise paragraph to read as follows: "A revised and updated permit application and Emission Inventory Questionnaire dated October 19, 2007 were submitted by Waste Management of Louisiana, L.L.C. requesting a revision of the Part 70 Permit pursuant to LAC 33: III. 529 on the basis that emissions considered by the current permit as having triggered Prevention of Significant Deterioration (PSD) do not exceed PSD when revised by applying appropriate Emission Factors.	The word "updated" in the sentence is removed.
SPECIFIC REQUIREMENTS 7 EQT0002 W-1a Landfill Gas Flare	Heat content was determined during the initial performance test conducted March 19, 2004. The heating value was shown to be 385 BTU/SCF, above 200 BTU/SCF. Therefore, this requirement had been fulfilled and is no longer applicable. See attachment to facility's 12/07/07 letter to the Department. This requirement should be removed or, alternatively, an asterisk * should be added and that asterisk should be defined as follows: "Requirement has been fulfilled by facility." If the Department does not remove the requirement or add the suggested asterisk*, then we ask that the Department confirm our understanding that the facility is in compliance with this requirement if the requirement has been fulfilled previously by the facility.	This is a requirement of 40 CFR 60.18(c)(3)(ii). Compliance of the requirement can be determined by the testing records.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
SPECIFIC REQUIREMENT 8 EQT0002 W-1a Landfill Gas Flare	Exit velocity was determined during the initial performance test conducted March 19, 2004. Exit velocity was shown to be 32.54 ft/sec, less than average maximum velocity determined 40 CFR 60.18(c)(4)(iii). Therefore, this requirement has been fulfilled is no longer applicable. See attachment to facility's 12/07/07 letter to the Department. This requirement should be removed or, alternatively, an asterisk * should be added and that asterisk should be defined as follows: "Requirement has been fulfilled by facility." If the Department does not remove the requirement or add the suggested asterisk*, then we ask that the Department confirm our understanding that the facility is in compliance with this requirement if the requirement has been fulfilled previously by the facility.	This is a requirement of 40 CFR 60.18(c)(4)(iii). Compliance of the requirement can be determined by the testing records.
SPECIFIC REQUIREMENT 19 UNF001 Woodside Landfill and Recycling Center	The facility previously reached emission rate of 50 MG/yr and submitted a Gas Collection and Control System Design Plan. The Landfill Gas Collection and Control Design Plan was submitted In September 2001. Therefore, this requirement has been fulfilled and is no longer applicable. This requirement should be removed or, alternatively, an asterisk * should be added and that asterisk should be defined as follows: "Requirement has been fulfilled by facility." If the Department does not remove the requirement or add the suggested asterisk*, then we ask that the Department confirm our understanding that the facility is in compliance with this requirement if the requirement has been fulfilled previously by the facility.	Since the landfill gas collection and control system has already been constructed according to the approved plan and is in operation. This requirement (40 CFR 60.752(b)(2)(i)) is no longer applicable and is removed.
SPECIFIC REQUIREMENT 24 UNF001 Woodside Landfill and Recycling Center	The facility previously installed a Landfill Gas Collection and Control System. The initial performance test for the Landfill Gas Collection and Control System was conducted March 19, 2004. Therefore, this requirement is no longer applicable. See attachment to facility's 12/07/07 letter to the Department. This requirement should be removed or, alternatively, an asterisk * should be added and that asterisk should be defined as follows: "Requirement has been fulfilled by facility." If the Department does not remove the requirement or add the suggested asterisk*, then we ask that the Department confirm our understanding that the facility is in compliance with this requirement if the requirement has been fulfilled previously by the facility.	Since the landfill gas collection and control system is already in operation. This requirement (40 CFR 60.752(b)(2)(ii)) is no longer applicable and is removed.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
SPECIFIC REQUIREMENT 34 UNF001 Woodside Landfill and Recycling Center	This requirement has been fulfilled. The initial performance test was conducted on March 19, 2004. See attachment to facility's 12/07/07 letter to the Department. Therefore, this requirement should be removed or, alternatively, an asterisk * should be added and that asterisk should be defined as follows: "Requirement has been fulfilled by facility." If the Department does not remove the requirement or add the suggested asterisk*, then we ask that the Department confirm our understanding that the facility is in compliance with this requirement if the requirement has been fulfilled previously by the facility.	This is a requirement of 40 CFR 60.754(e). Compliance of the requirement can be determined by the testing records.
SPECIFIC REQUIREMENT 38 UNF001 Woodside Landfill and Recycling Center	In accordance with 40 CFR 60.755(c), monitoring of surface concentrations of methane is required quarterly. Thus, the "Which Months" reference should state "Quarterly" instead of "All Year".	The requirement already indicates that it is quarterly monitoring. "Which Months" is used to indicate that a requirement is only applicable in which months of a year.
SPECIFIC REQUIREMENT 39 UNF001 Woodside Landfill and Recycling Center	In accordance with 40 CFR 60.756(a)(1), monitoring of gauge pressure at each individual well is required monthly. Thus, the "Which Months" reference should state "Monthly" instead of "All Year".	The requirement already indicates that it is monthly monitoring. "Which Months" is used to indicate that a requirement is only applicable in which months of a year.
SPECIFIC REQUIREMENT 40 UNF001 Woodside Landfill and Recycling Center	In accordance with 40 CFR 60.756(a)(2), monitoring of nitrogen or oxygen at each individual well is required monthly. Thus, the "Which Months" reference should state "Monthly" instead of "All year".	See response above.
SPECIFIC REQUIREMENT 41 UNF001 Woodside Landfill and Recycling Center	In accordance with 40 CFR 60.756(a)(3), monitoring of temperature at each individual well is required monthly. Thus, the "Which Months" reference should state "Monthly" instead of "all Year".	See response above.
SPECIFIC REQUIREMENT 42 UNF001 Woodside Landfill and Recycling Center	A Gas Collection and Control System has been installed. Therefore, this requirement should be removed or, alternatively, an asterisk * should be added and that asterisk should be defined as follows: "Requirement has been fulfilled by facility." If the Department does not remove the requirement or add the suggested asterisk*, then we ask that the Department confirm our understanding that the facility is in compliance with this requirement if the requirement has been fulfilled previously by the facility.	Since the landfill gas collection and control system is already in operation. This requirement (40 CFR 60.757(b)(1)) is no longer applicable and is removed.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
SPECIFIC REQUIREMENT 43 UNF001 Woodside Landfill and Recycling Center	The facility previously reached emission rate of 50 MG/yr and submitted a Collection and Control System Design Plan. The Landfill Gas Collection and Control Design Plan was submitted In September 2001. Therefore, this requirement has been fulfilled and is no longer applicable. This requirement should be removed or, alternatively, an asterisk * should be added and that asterisk should be defined as follows: "Requirement has been fulfilled by facility." If the Department does not remove the requirement or add the suggested asterisk*, then we ask that the Department confirm our understanding that the facility is in compliance with this requirement if the requirement has been fulfilled previously by the facility.	Since the landfill gas collection and control system is already in operation. This requirement (40 CFR 60.757(c)) is no longer applicable and is removed.
SPECIFIC REQUIREMENT 69 UNF001 Woodside Landfill and Recycling Center	LAC 33:III Chapter 29 is not applicable. See LAC 33: III. 2901.E.5. Remove requirement or, alternatively, substitute the following: "Shall comply with all applicable requirements of LAC 33:III, Chapter 29."	The requirement is deleted.
SPECIFIC REQUIREMENT 70 UNF001 Woodside Landfill and Recycling Center	LAC 33:III Chapter 29 is not applicable. See LAC 33: III. 2901.E.5. Remove requirement or alternatively, substitute the following: "Shall comply with all applicable requirements of LAC 33:III, Chapter 29."	The requirement is deleted.
SPECIFIC REQUIREMENT 85 UNF001 Woodside Landfill and Recycling Center	Add "If requested by the Department," to the beginning of this requirement so that the requirement reads as follows: "If requested by the Department, determine the status of compliance beyond the property line, with applicable ambient air standards listed in LAC 33: III.5112.Table 51.2."	The requirements of LAC 33:III.Chapter 51, Subchapter A have been updated according to the revised regulation, which became effective on December 20, 2007.
SPECIFIC REQUIREMENT 86 UNF001 Woodside Landfill and Recycling Center	There is no LAC 33: III. 5109.C.2. Proper citation is LAC 33:III.5109.C Therefore, revise reference to read as follows: "LAC III. 5109.C."	See above response.

DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

MEMORANDUM

TO: Qingming Zhang

FROM: Gerri G. Garwood, P.E. GGG

BY: Timothy Bergeron TB

SUBJECT: Engineering Services Request

DATE: December 14, 2007

Engineering has reviewed your request concerning the CO emission factor for flare EQT 2 at Woodside Landfill. The CO emission factor of 0.37 lb/MMBtu is acceptable since LFG Specialties guarantees the flare can meet this specification.

ENVIRONMENTAL **ASSESSMENT**
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