DRAFT/PROPOSED

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **October 10, 2023**

TO: Phillip Fielder, P.E., Chief Engineer

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

THROUGH: Eric L. Milligan, P.E., Engineering Manager, Engineering Section

THROUGH: David Schutz, P.E., New Source Permits Section

FROM: Iftekhar Hossain, P.E., New Source Permits Section

SUBJECT: Evaluation of Operating Permit Application **No. 2023-0135-TVR4**
Oklahoma Landfill Holdings, Inc.
Southern Plains Landfill (Facility ID: 3386)
3198 Country Street 2910, Ninnekah, OK 73067
Latitude N 34.92778°, Longitude W 97.81166°
Section 3, Township 5N, Range 6W, Ninnekah, Grady County, Oklahoma
Directions: From Ninnekah, go 4 mile east on County Road EW 142, turn southeast onto State Highway 19 and go 3.4 miles, turn north into the site.

SECTION I. INTRODUCTION

Oklahoma Landfill Holdings, Inc. has submitted an application for renewal of the Part 70 operating permit for the Southern Plains Landfill (SIC 4953, NAICS 562212). The Southern Plains Landfill is an active municipal solid waste (MSW) landfill under DEQ Land Protection Division (LPD) Solid Waste ID No. 3526013. The facility started receiving waste in 1987. The original Title V Permit No. 99-411-TV was issued on March 6, 2003. Currently, the Southern Plains Landfill is operating under Permit No. 2018-0084-TVR3 (M-2), issued on May 5, 2022. The facility is a minor source for PSD and a minor source of HAPs. AQD also uses this opportunity to update applicable state rules and federal regulations related to the facility.

SECTION II. REQUESTED CHANGES

No changes have been requested in this permit.

SECTION III. FACILITY AND PROCESS DESCRIPTION

The Southern Plains Landfill began construction and started operation to receive solid waste in 1987. The total land area owned by the Oklahoma Landfill Holdings, Inc. is 334 acres and the waste disposal area permitted for landfill operations by LPD is 173.3.0 acres. Currently, the facility operates 5.5 days a week and receives nonhazardous solid wastes from Grady County and its adjacent counties. Waste Connections, Inc., who owns the Southern Plains Landfill, also owns a

fleet of approximate 30 trucks. The fleet of trucks transport wastes to the facility. In 2017, the facility received approximately 584 ton/day of municipal, commercial, and industrial nonhazardous waste. Presently, the Southern Plains Landfill has a pre-expansion design capacity of approximately 6,408,344 Megagrams (Mg) for waste acceptance permitted by LPD. The design capacity of the landfill with the expansion as approved by LPD and 2018-0084-TVR3 M-2 is 8,596,074 Mg. The site has not begun construction in the expansion area and does not anticipate moving into the construction area in the near future.

Landfill gas (LFG) is generated by microbiological processes associated with solid waste decomposition, and LFG is composed primarily of methane (CH_4) and carbon dioxide (CO_2): CO_2 content ranging from 30% to 50% and CH_4 from 40% to 60%. Initial decomposition of the wastes is continuous and rapid until the entrained oxygen within the refuse is depleted. The second stage is anaerobic decomposition that can be divided into two separate and independent processes: non-methanogenic and methanogenic. CO_2 is a byproduct of the non-methanogenic process and CH_4 is a byproduct of the methanogenic process. LFG may contain small amounts of non-methane organic compounds (NMOC), which include trace volatile organic compounds (VOC) and hazardous air pollutants (HAP). The production of LFG begins a few months after initial waste placement and continues until the microbial reactions are limited by substrate or moisture availability. LFG production is also affected by the solid waste disposal rate and varies over the life of the landfill. Generally, LFG production increases with time until a peak volume is reached shortly after landfill closure. In general, the LFG collection system consists of a network of vertical extraction wells, horizontal header pipes, and gas condensate sumps. The collected LFG is transported to an on-site flare.

The facility has a landfill design capacity greater than 2.5 million Mg and 2.5 million cubic meters (m^3) and has NMOC emission rate greater than 34 Mg/yr; making it subject to Title 40 CFR Part 62, Subpart OOO, Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction on or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014 (40 CFR Part 62 Subpart OOO), thus requiring a Part 70 permit. This facility used to be subject to the requirements of NSPS Subpart WWW, but as of June 21, 2021, these requirements were supplanted by 40 CFR Part 62 Subpart OOO. The facility has NMOC emission rate greater than 50 Mg/yr; therefore, the facility is required to comply with NESHAP Subpart AAAA and is required to install and operate a gas collection and control system (GCCS). The facility has an active GCCS that routes collected LFG from current 25 extraction wells to the utility flare. The number of LFG extraction wells will be increased to comply with the more stringent requirements of an effective state (OAC 252:100-47 once the rule is revised) or federal Implementation plan (40 CFR Part 62 Subpart OOO (i.e., the FIP)). At the present time, the facility is a Part 70 source and will have to meet the requirements of 40 CFR Part 62 Subpart OOO (i.e., the FIP) or OAC 252:100-47 once the rule is revised and the state's 111(d) Plan is approved by EPA. Currently, the LFG utility flare system is capable of processing 2,000 scfm of LFG, where it is combusted, reduced, and exhausted to the atmosphere.

The 2,000-scfm LFG utility flare is equipped with a flame safeguard and an auto-ignition pilot system that provided automatic flare startup. A master flow control valve installed along the main LFG header regulates the amount of LFG extracted from the landfill. This valve is also used as an isolation valve to prevent the direct release of LFG emissions from the collection system during

system repairs. Monitoring ports in the main header, upstream from the valve, are used to measure LFG flow, pressure, and composition.

SECTION IV. PERMIT HISTORY

Permits	Date Issued	Description
99-411-TV	March 6, 2001	Initial Title V Permit.
2007-172-TVR	August 8, 2008	Title V Renewal
2013-0084-TVR2	July 30, 2013	Title V Renewal
2018-0084-TVR3	September 5, 2018	Title V Renewal
2018-0084-TVR3 M-1	June 18, 2021	Minor modification to Operating Permit: • Included Alternatives to GCCS Design Plan.
2018-0084-TVR3 M-2	May 5, 2022	Minor modification to Operating Permit: • Replace existing 1,000-scfm flare with a 2,000-scfm utility flare due to its age and need to control additional LFG. • Update emissions from landfill fugitives to reflect approved increased design capacity.

SECTION V. EQUIPMENT

Emission Units (EU) have been arranged into Emission Unit Groups (EUG) in the Equipment Section. Table 1 lists the EUGs.

Table 1. Emission Unit (EU) Information

EU ID #	Emission Sources	EU Group Name
EUG-1	LFG Fugitives from Underground & PM_{10} and $PM_{2.5}$ Fugitives From Earthmoving Operations	Landfill Operation
EUG-2	Utility Flare System	GCCS and LFG Flare

Generally speaking, there are two main sources of emissions at the site. Once MSW is placed in the landfill, it is compacted and covered with soil/dirt/earth. The anaerobic decomposition of buried organic wastes within the covered landfill produces a biogas commonly referred to as LFG. EUG-1 includes uncollected LFG fugitives from underground and $PM_{10}/PM_{2.5}$ fugitives, which are caused by earthmoving operation equipment, such as dozers, compactors, dump trucks, excavators, graders, and tractors.

EUG-2 includes the GCCS and LFG flare system. The GCCS consists of a network of extraction wells (currently 25 wells, with numbers changing over time) and collection pipes that collect LFG generated within the landfill. The GCCS is also comprised of a blower system which induces negative pressure within the landfill and transfers the collected LFG to an open flare system for burning. This facility does not have any LFG treatment system (LFGTS) equipment located at the landfill site.

SECTION VI. AIR EMISSIONS

This landfill facility includes the following emission sources:

A. Landfill Gas Generation and Uncollectable Fugitive LFG
B. Flare Operations
C. Earthmoving Equipment Operations
D. Insignificant Activities

A. Landfill Gas Generation

Municipal solid waste is accepted and taken directly to the landfill for disposal. The anaerobic decomposition of organic material in the waste results in the generation of a biogas commonly referred to as LFG. Consisting of approximately 50 percent methane and 50 percent carbon dioxide, LFG also includes other trace compounds and water vapor.

The EPA's Landfill Gas Emissions Model (LandGEM) Version 3.03 (06/2020) was used to determine the NMOC and maximum LFG generation for the site, based on an average site conditions and conservative forecasts. The NMOC is determined based on the model's input parameters: (1) landfill's total design capacity of 8,596,074 Mg, (2) past waste acceptance data and future forecast figure, (3) a methane generation rate constant of 0.04 yr^{-1}, (4) a potential methane generation capacity of 100 m^3/Mg, and (5) a site-specific NMOC concentration of 645 parts per million by volume (ppmv). Based on the results of the modeling, the maximum NMOC generation rate is estimated at 112.00 Mg per year in 2037, which is greater than 50 Mg per year. The NMOC emission rates between 2011 and 2022 are also estimated and shown in Table 2, with an NMOC rate of 88.54 Mg per year in 2022. Table 2 shows that the NMOC emission exceeds 50 Mg per year starting in 2012. The LandGEM software program was conducted on May 18, 2018.

Table 2. Estimated NMOC Emissions from 2011 to 2022

NMOC Emissions From 2011 to 2022	Projected Waste Accepted (Mg/yr)	Projected NMOC Emissions (Mg/yr)
2011	163,419	49.60
2012	230,022	53.46
2015	232,118	71.62
2018	153,216	81.06
2022	158,425	88.54

The maximum LFG generation is determined based on LandGEM model's default inventory parameters: (1) landfill's total design capacity of 8.6 million Mg, (2) waste acceptance data, (3) a methane generation rate constant of 0.04 yr^{-1}, (4) a potential methane generation capacity of 100 m^3/Mg, and (5) a site-specific NMOC concentration of 645 parts per million by volume (ppmv). Based on the results of the modeling, the landfill generates a maximum of 17.76 million cubic meters per year (m^3/yr) of methane (CH_4) or 1,193 standard cubic feet per minute (SCFM) of CH_4 in 2037. Methane is assumed to be 50 percent of the total volume of LFG. The maximum projected LFG generation rate from the landfill site is estimated to be 2,357 SCFM at 50% methane in 2041.

In accordance with the EPA AP-42 (11/98), Section 2.4, "MSW Landfills", based on a collection efficiency of 75%, 25% of the uncollected LFG is released as fugitive emissions to the air from underground. The fugitive VOC and HAP emissions were calculated by using equations # 3 and # 4 from AP-42 (11/98), Section 2.4, "MSW Landfills", and by using the concentration of the LFG compound. The concentrations for LFG compounds were calculated by using a ratio of each compound's default LandGEM version 3.02 concentration to the default NMOC concentration.

Table 3. Potential Speciated HAP Emissions
(Based on 8,760 hours/year of operations)

Compound	Molecular Weight	ppmv	Fugitive Emissions	
			lb/hr	TPY
1,1,1-Trichloroethane	133.41	0.52	0.006	0.03
1,1,2,2-Tetrachloroethane	167.85	1.18	0.02	0.08
1,1-Dichloroethane (ethylidene dichloride)	98.97	2.58	0.02	0.10
1,1-Dichloroethene (vinylidene chloride)	96.94	0.22	0.002	0.008
1,2-Dichloroethane (ethylene dichloride)	98.96	0.44	0.004	0.02
1,2-Dichloropropane (propylene dichloride)	112.99	0.19	0.002	0.01
Acrylonitrile	53.06	6.77	0.03	0.14
Benzene	78.11	2.04	0.01	0.06
Carbon disulfide	76.13	0.62	0.004	0.02
Carbon tetrachloride	153.84	0.004	<0.001	<0.001
Carbonyl sulfide	60.07	0.53	0.003	0.01
Chlorobenzene	112.56	0.27	0.003	0.01
Chloroethane	64.52	1.40	<0.01	0.04
Chloroform	119.39	0.03	<0.001	<0.001
Chloromethane	50.49	1.29	<0.01	0.03
Dichlorobenzene	147.00	0.23	<0.01	0.01
Dichloromethane	84.94	15.05	0.12	0.51
Ethylbenzene	106.16	4.95	0.05	0.21
Ethylene dibromide	187.88	1.0E-03	<0.001	<0.001
Hexane	86.18	7.10	0.06	0.24
Methyl isobutyl ketone	100.16	2.04	0.02	0.08
Mercury	200.61	2.9E-04	0.00	0.01
Perchloroethylene	165.83	3.98	0.06	0.26
Toluene	92.13	41.93	0.35	1.53
Trichloroethylene	131.40	3.01	0.04	0.19
Vinyl chloride	62.50	7.85	0.04	0.20
Xylenes	106.16	12.90	0.13	0.54
Total HAPs				**4.27**

Table 4. Estimated Landfill Fugitive Emissions
(Based on 8,760 hours/year of operations)

Pollutants	Emission Rate (TPY)
VOC	7.00
HAP	4.27

B. Flare Operations

The LFG utility flare at the Southern Plains Landfill has a designed flow rate of 2,000 SCFM and is equipped with a flame safeguard and an auto-ignition pilot system that provides automatic flare startup. A master flow control valve installed along the main LFG header regulates the amount of LFG extracted from the landfill. This valve is also used as an isolation valve to prevent the direct release of LFG emissions from the collection system during system repairs. Monitoring ports in the main header, upstream from the valve, are used to measure LFG flow, pressure, and composition.

Air emissions from the flare are primarily NOx, CO, SO_2, PM_{10}, $PM_{2.5}$, and VOC. The air emission estimates for the flare system are based on the following conditions:

1. System's maximum design flowrate at 2,000 SCFM.
2. LFG constituents of 50% methane.
3. Emission factor for SO_2 is based on a conservative concentration of 400 ppmv sulfur in the LFG.
4. Emission factors from manufacturer for NO_x and CO, and from AP-42 (11/98) Table 2.4-5 for PM, PM_{10}, and $PM_{2.5}$.
5. LFG's heating value of 506 BTU/ft^3 or 60.72 MMBTUH for the flare.
6. A destruction (combustion) efficiency rate of 98% for VOCs and HAPs (By LandGEM).
7. Estimates of HAP emissions are based on LFG constituent concentrations in AP-42 (11/98) Table 2.4-1, and the system's design flow rate (2,000 SCFM) of LFG being collected and combusted in the flare.

Table 5. Estimated Flare Emissions
(Based on 8,760 hours/year of operations)

Pollutants	Emission Factors	Emission Rate (TPY)
NO_x	0.068 lb/MMBTU	18.08
CO	0.31 lb/MMBTU	82.45
Particulate Matter, PM_{10}, or $PM_{2.5}$	0.00104 lb/hr/scfm of CH_4	4.38
SO_2	--------	34.34
HAP	--------	2.46
VOC		0.48

C. Earthmoving Equipment Operations

Particulate matter (PM) emissions are generated during on-site earthmoving operations, which include the excavation of landfill cells and the placement of daily cover soil over the freshly placed waste at the landfill's working face. At least six inches of compacted earthen materials shall be used to cover the freshly placed MSW on a daily basis, which is required by OAC 252:515-19-51. OAC 252:515 is "Management of Solid Waste." The Southern Plains Landfill applies cover soil one day per week and utilizes an alternative daily cover the rest of the operating week. To control PM emissions from earthmoving operations, water is sprayed on the surfaces by a water truck as needed. PM emissions from the various earthmoving operations are based on the operating hours of the earthmoving equipment and the number and types of vehicles. Due to the requirement of

OAC 252:515-19-51, earthmoving operations are related to primary business activities and are not considered insignificant or trivial. PM emissions shall be counted in the facility-wide emissions.

The Southern Plains Landfill received 238,788 tons of MSW in 2021. To be conservative for PM emission estimation purposes, the loading and unloading activities are based on 330,000 tons of soil per year. Currently, the Southern Plains Landfill is operated 10 hour/day, 5.5 days per week, and 52 weeks per year.

Air emissions generated from the landfill's earthmoving operations include the PM emissions from bulldozers, compactors, dump trucks, tractors, and graders at the site.

Bulldozing / Compaction / Tractor Emissions

Dozing and compacting operations emissions were estimated using emission factors derived from AP-42 (10/98), Table 11.9-1, for handling overburden materials, Section 11.9, "Western Surface Coal Mining." The emission factor equation for dozing and compacting operations is presented below:

$$E = kc\ (s)^a/(M)^b$$

Where k, a, and b are empirical constants and the variables s and M are defined as:

E = Emission factor (lb/hr)
s = Mean material silt content (%), 6.9% from Table 11.9-3
M = Mean material moisture content (%), 12% for landfill soil cover from Table 13.2.4-1
k = 0.75 lb/hr for PM_{10} and 0.105 lb/hr for $PM_{2.5}$
a = 1.5 for PM_{10} and 1.2 for $PM_{2.5}$
b = 1.4 for PM_{10} and 1.3 for $PM_{2.5}$
c = 1.0 for PM_{10} and 5.7 for $PM_{2.5}$

The emission factors are calculated as 0.4193 lb/hr for PM_{10} and 0.2403 lb/hr for $PM_{2.5}$. The total working hours of bulldozers and compactors together are assumed to be 37,440 hours per year. The total emissions are calculated as 7.85 TPY for PM_{10} and 4.50 TPY for $PM_{2.5}$.

Grading Emissions

The emission factor equation for grading operations is from AP-42 (10/98), Table 11.9-1 and presented below:

$$E = k\ (0.051)\ (S)^a$$

Where k, and a are empirical constants and the variable S are defined as:

E = Emission factor (lb/VMT)
S = Mean vehicle speed (mph), 5 mph for grader vehicle
k = 0.60 lb/VMT for PM_{10} and 0.031 lb/VMT for $PM_{2.5}$
a = 2.0 for PM_{10} and $PM_{2.5}$

The emission factors are calculated as 0.765 lb/VMT for PM_{10} and 0.07 lb/VMT for $PM_{2.5}$. The total VMT (Vehicle Mile Traveled) for one grader vehicle is 9,360 VMT per year. The vehicle works 1,872hrs/yr, 6 days/week, and 52 weeks per year. The emissions are calculated as 3.28 TPY for PM_{10} and 0.17 TPY for $PM_{2.5}$.

Truck Loading & Unloading Emissions

Emissions from dump truck and excavator (hoe loading) operations were estimated using emission factors derived from AP-42 (11/06), Table 13.2.4-1, Section 13.2.4, "Aggregate Handling and Storage Piles." The emission factor equation, Equation (1) in Section 13.2.4.3 for materials dropping is presented below:

$$Emission\ Factor, E = k(0.0032)\frac{(U/5)^{1.3}}{(M/2)^{1.4}}$$

Where k, U, and M are parameters, which are defined as:

E = Emission factor (lb/ton)
k = Particle size multiplier, 0.35 for PM_{10} and 0.053 for $PM_{2.5}$
U = Mean wind speed, 10 miles/hour
M = Mean material moisture content (%), 3.2% for landfill soil/dirt

The emission factors are calculated as 0.00143 lb/ton for PM_{10} and 0.00022 lb/ton for $PM_{2.5}$. The total weight of soil/dirt, which are loaded to the truck and then unloaded to the ground, is estimated to be 330,000 tons per year. The emissions are calculated as 0.24 TPY for PM_{10} and 0.04 TPY for $PM_{2.5}$.

Emissions from dump truck unloading to the ground were estimated using the same equation as the excavator operations from the ground to dump truck loading. The emissions are calculated as 0.24 TPY for PM_{10} and 0.04 TPY for $PM_{2.5}$.

MSW Delivery Truck Emissions

Fugitive emissions from vehicle traffic are estimated based on AP-42 (11/2006), Section 13.2.2, "Introduction to Fugitive Dust Sources, Unpaved Roads." Equation (1a) in Section 13.2.2, for industrial roads, is used to calculate the PM_{10} and $PM_{2.5}$ emissions for the unpaved road.

$$E = k\ (s/12)^a\ (w/3)^b$$

Where k, a, and b are empirical constants and the variables S and W are defined as:

E = site-specific emission factor (lb/VMT)
S = surface material silt content (%), 6.4% for MSW Landfills
W = mean vehicle weight (tons), 22.5 tons
k = 1.5 lb/VMT for PM_{10} and 0.15 lb/VMT for $PM_{2.5}$
a = 0.9 for PM_{10} and $PM_{2.5}$
b = 0.45 for PM_{10} and $PM_{2.5}$

The emission factors are determined to be 2.109 lb of PM_{10} and 0.211 lb of $PM_{2.5}$ per VMT for the unpaved roads. It is assumed that a 10-wheeler is used to transport 9 tons of MSW with total vehicle weight at 27 tons and the mean vehicle weight at 22.5 tons for each trip to the site. The unpaved road is approximately 0.25 mile from the site entrance to the end of the active landfill area. The total round trip, in and out of the site, traveled by a vehicle is approximately 0.50 miles, one way is full and one way is empty. The Southern Plains Landfill received 167,877 tons of MSW (or 584 tons per working day) in 2022. It takes approximately 18,567 vehicles a year to deliver about 167,105 tons of MSW in a year. The uncontrolled PM_{10} fugitive emissions are estimated to be 9.79 TPY prior to applying dust control on the unpaved portion, such as water spraying. Application of water to the unpaved roads at the facility is considered a reasonable precaution to minimize fugitive dust and is required per OAC 252:100-29. Based on the control efficiency of 70% for application of water, the controlled PM_{10} fugitive emissions are reduced to 2.94 TPY. The corresponding $PM_{2.5}$ fugitive emissions are 0.29 TPY.

Table 6. PM_{10} and $PM_{2.5}$ Dust Fugitive Emissions

Emission Source	**PM_{10} (TPY)**	**$PM_{2.5}$ (TPY)**
Bulldozing and Compaction	7.85	4.50
Grading	3.58	0.18
Dump Truck, Tractor, & Excavator Loading	0.24	0.04
Dump Truck, Tractor, & Excavator Unloading	0.24	0.04
MSW Delivery Truck Travel	2.94	0.29
Total Emissions	**14.85**	**5.05**

D. Insignificant and Trivial Activities

Other minor sources and activities that may generate air emissions at the facility are listed below. These insignificant sources qualify under one or more of the activities listed in the DEQ's Insignificant Activities and Trivial Activities OAC 252:100 Appendices I and J, respectively.

- Vehicle travel on unpaved roads.
- Liquid waste solidification process (≤ 5 TPY emission of any criteria pollutant).
- One (1) 10,000-gallon diesel storage tank (throughput ≤ 2,175 gallons per day).
- Leachate Pond (Trivial Activity, vapor pressure < 1.5 psia).

The appropriate records of hours, quantity, or capacity will be maintained sufficient to demonstrate that the insignificant sources qualify as Insignificant Activities or Trivial Activities. However, their air emissions will not be presented and listed in this section.

E. Greenhouse Gas (GHG) Emissions

The potential fugitive Greenhouse Gas (GHG) emissions are estimated based on a worst-case scenario, which assumes all generated LFG are emitted as fugitives. The following conditions are adopted in the estimation:

- Maximum LFG generation rate at 32,160 Mg/year.
- Maximum methane (CH_4) generation rate at 8,710 Mg/year.
- Maximum carbon dioxide (CO_2) generation rate at 23,900 Mg/year.
- Becoming fugitives, 10% of CH_4 is oxidized to CO_2 when LFG passes through cover soils via biogenic process
- Global warming potentials (GWP) are listed below:

Pollutants	**GWP Factor**
CO_2	1
CH_4	25

GHG emissions are expressed as CO_2e. Table 7 lists annual potential facility-wide Greenhouse Gas emissions based on the nature of the generation. The GHG emissions are presented both as metric ton per year (MTPY) and TPY.

Table 7. Potential Facility-Wide Greenhouse Gas Emissions

Emissions Source	**Total CO_2e**	
	MTPY	**TPY**
Biogenic CO_2	26,295	28,985
GHG Pollutants Excluding Biogenic CO_2	195,975	215,990
Total Potential Emissions	**222,270**	**244,975**

At the time of the submission of this application, there are no additional federal regulatory requirements applicable to greenhouse gas emissions from the Southern Plains Landfill and covered by Title V Permit Program authority. Federal GHG Mandatory Reporting Rule requirements published at 40 CFR Part 98 were enacted under sections 114(a)(1) and 208 of the Clean Air Act and, as such, are not included in the definition of "applicable requirements", as found at 40 CFR §70.2 and §71.2, to be included in a Title V Permit. However, for the worst case scenario, the biogenic carbon dioxide emissions are preferably included and counted in the air emission estimation.

F. GCCS Design Plan Alternatives To NSPS Subpart WWW

As allowed under both Federal Plan OOO as well as NESHAP Subpart AAAA, the site has currently approved alternatives under Subpart WWW, that can be carried over under Subpart OOO regulations. The site would like to keep their existing approved alternatives from current permit 2018-0084-TVR3(M-2). The approved alternatives, which are able to satisfy the NSPS Subpart WWW:

1. Nonproductive Wells
2. Wellhead Temperatures
3. Alternate for Corrective Measures
4. Odor Control
5. Control Device Reporting Requirements
6. Operational Standards

7. Extraction Well Monitoring
8. Use of an Alternative Sampling Method
9. Collection Device Abandonment
10. Early Installation of Collection Devices
11. Flow Meters When No Bypass Is Present
12. GCCS Expansion/Modification
13. Alternate Remedy for Surface Emission Monitoring (SEM) Events

For permitting purposes, the air emissions are the first factor to be considered and addressed in a permit modification. For landfill sites, the potential air emissions are estimated by LandGEM software program, not estimated by measurement of pollutant composition in waste streams, and/or not estimated by calculation through equipment operations. For further explanation, the maximum LFG generation is determined based on LandGEM model's default inventory parameters: (1) landfill's total design capacity of 6.41 million Mg, (2) waste acceptance data, (3) a methane generation rate constant of 0.04 yr^{-1}, (4) a potential methane generation capacity of 100 m^3/Mg, and (5) a site-specific NMOC concentration of 645 parts per million by volume (ppmv). The above thirteen GCCS Design Plan alternatives are not related to air emissions and do not provide inputs to the LandGEM software program; therefore, they cause no increase/decrease of potential air emissions.

The landfill industry has developed standard operation procedures (SOP) for GCCS operations and maintenances based on the regulatory requirements and business demands. The business demands include maximizing the LFG production, minimizing byproduct or side-product appearance, such as oxygen and nitrogen in LFG stream, process safety, personal/personnel safety, economic cost/benefit analysis for their investment and business growth, and best management practice. Southern Plains Landfill has demonstrated that the thirteen alternatives are in compliance with the related regulatory requirements; therefore, there is no need to repeat the demonstration of compliance in the permit. The AQD Permits Section does not see the need to add new specific conditions to the permit for these thirteen alternatives except to request Southern Plains Landfill to continue to comply with the Design Plan.

G. Air Emissions Summary

Table 8 shows the potential facility-wide emissions of all air pollutants.

Table 8. Total Potential Facility-Wide Air Emissions

Pollutants	Utility Flare	Landfill	Facility	Potential Totals
	TPY	**TPY**	**TPY**	**TPY**
NO_X	18.08	-----	-----	**18.08**
CO	82.45	-----	-----	**82.45**
VOC	0.48	7.00	-----	**7.48**
PM_{10}	4.38	14.85	-----	**19.23**
$PM_{2.5}$	4.38	5.05	-----	**9.42**
SO_2	34.34	-----	-----	**34.34**
HAP	2.46	4.27	-----	**6.73**
GHG as CO_2e	-----	-----	244,975	**244,975**

SECTION VII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application and listed in OAC 252:100-8, Appendix I, are duplicated below. Record keeping for activities indicated with a "*" is specified in the Specific Conditions. Any activity to which a state or federal applicable requirement applies is not insignificant even if it is included on this list.

1. *Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOCs with a vapor pressure less than 1.5 psia at maximum storage temperature. The diesel tank has capacity less than 39,894 gallons and vapor pressures less than 1.5 psia.

2. * Activities having the potential to emit no more than 5.0 TPY (actual) of any criteria pollutant. The propane heater and waste oil heater have the potential to emit no more than 5.0 TPY of any criteria pollutant.

SECTION VIII. OKLAHOMA AIR QUALITY RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations listed in OAC 252:100, Appendix Q. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]
The owner or operator of any facility that is a source of air emissions shall submit a complete emission inventory annually on forms obtained from the Air Quality Division. An emission inventory was submitted, and fees paid for previous years as required.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility that result in emissions not authorized in the permit and that exceed the "Insignificant Activities" or "Trivial Activities" thresholds require prior notification to AQD and may require a permit modification. Insignificant activities refer to those individual emission units either listed in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits.

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule

The facility is classified a Part 70 source as specified in NSPS Subpart WWW since design capacity of the landfill is greater than 2.5 million megagrams or 2.5 million cubic meters. As such, a Title V (Part 70) operating permit is required.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-17 (Incinerators) [Not Applicable]
An "incinerator" is defined as "a combustion device specifically designed for the destruction, by high temperature burning, of solid, semi-solid, liquid, or gaseous combustible wastes and from which the solid residues contain little or no combustion material." Under 252:100-17-2.1, flares and other pollution control devices are exempted from Subchapter 17.

OAC 252:100-19 (Particulate Matter) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Appendix C specifies a PM emission limitation of 0.60 lb/MMBTU for all equipment at this facility with a heat input rating of 10 Million BTU per hour (MMBTUH) or less. The utility flare (open flare) is not considered a "fuel-burning unit.

Section 19-12 limits particulate emissions from new and existing directly fired fuel-burning units (and/or) emission points in an industrial process based on process weight rate, as specified in Appendix G. The utility flare (open flare) is not considered a "fuel-burning unit." .

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]
No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. Use of dust control measures ensures compliance with opacity requirement of this subchapter.

OAC 252:100-29 (Fugitive Dust) [Applicable]
This subchapter states that no person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Precautions are stated in the Specific Conditions to minimize fugitive dust.

OAC 252:100-31 (Sulfur Compounds) [Part 2 Applicable]
Part 2 also limits the ambient air impact of hydrogen sulfide emissions from any new or existing source to 0.2 ppmv for a 24-hour average (equivalent to 283 $\mu g/m^3$). Estimated ambient concentrations of H_2S for the facility is 0.0095 ppmv for a 24-hour average which is well below the ambient standard.
Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBtu heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. The flare does not meet the definition of "fuel-burning equipment."
Part 5 also requires that all thermal devices for petroleum and natural gas processing facilities regulated under OAC 252:100-31-26(a) shall have installed, calibrated, maintained, and operated an alarm system that will signal noncombustion of the gas. The equipment at this facility does not meet the definition of "petroleum or natural gas process equipment" and, therefore, is not subject to this requirement.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NOx per MMBTU. There are no equipment items that exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]
This facility has none of the affected sources: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic reforming unit or petroleum catalytic cracking unit.

OAC 252:100-37 (Volatile Organic Compounds) [Not Applicable]
Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. This facility does not have storage tanks, which store VOCs with a vapor pressure greater than 1.5 psia.
Part 3 requires VOC loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading. Therefore, this requirement is not applicable.
Part 5 limits the VOC content of coatings used in coating lines or operations. This facility will not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt.
Part 7 requires fuel-burning and refuse-burning equipment to be cleaned, operated, and maintained to minimize emissions of VOC. Based on manufacturer's data and good engineering practice, the

equipment must not be overloaded and the temperature and available air must be sufficient to provide essentially complete combustion. The flare is considered "refuse-burning equipment."

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

OAC 252:100-47 (Control of Emissions from Existing MSW Landfills) [Not Applicable]
This subchapter affects existing MSW landfills, that have not been modified or constructed after May 30, 1991, with a design capacity greater than 2.5 million megagrams or 2.5 million cubic meters which are required to obtain a Part 70 permit and comply with all provisions specified in 40 CFR §60.752. Since this landfill was modified in 2001, which is after May 30, 1991, this landfill is not considered existing, therefore, this landfill is not subject to this subchapter. This facility is subject to the federal plan in 40 CFR Part 62, Subpart OOO, implementing the emission guidelines in 40 CFR Part 60, Subpart Cf. The facility will be subject to OAC 252:100-47 and the state 111(d) plan implementing the emission guidelines upon EPA approval of said plan.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility

OAC 252:100-11	Alternative Reduction	Not requested
OAC 252:100-23	Cotton Gins	Not type of emission unit
OAC 252:100-24	Feed & Grain Facility	Not in source category
OAC 252:100-39	Nonattainment Areas	Not in a subject area

SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]

PSD does not apply. The total emissions are less than the threshold level of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60 [Not Applicable]

Subpart A, General Provisions. This subpart specifies standards only for control devices used to achieve compliance with an applicable NSPS Subpart. .

Subpart Cc, Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills. This subpart contains emission guidelines and compliance times for the control of certain designated pollutants from certain designated municipal solid waste landfills. OAC 252:100-47 is the state rule covering the same requirements. At the present time, the facility is a Part 70 source and will have to meet the requirements of this subpart through 40 CFR Part 62 Subpart OOO (i.e. the FIP) or OAC 252:100-47 once the rule is revised and the state's 111(d) Plan is approved by EPA. Therefore, this facility is not subject to this subpart.

Subpart Cf, Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills. This subpart affects each landfill that accepts MSW after November 08, 1987, and commences construction, reconstruction, or modification before July 17, 2014. OAC 252:100-47 is the state rule covering the same requirements. These emission guidelines are required to be adopted by AQD and incorporated into AQD's OAC 252:100-47. At the present time, the facility is a Part 70 source and will have to meet the requirements of this subpart through 40 CFR Part 62 Subpart OOO (i.e. the FIP) or OAC 252:100-47 once the rule is revised and the state's 111(d) Plan is approved by EPA.

Subparts K, Ka, Kb, VOL Storage Vessels. Subpart Kb regulates hydrocarbon storage tanks larger than 19,813 gallons capacity and built after July 23, 1984. The diesel storage tank is 10,000 gallon, which is less than 19,813 gallons, therefore, not subject to this subpart.

Subpart WWW, Municipal Solid Waste Landfills. This subpart affects each municipal solid waste landfill (MSWL) that commenced construction, reconstruction, or modification, or began accepting waste on or after May 30, 1991 but before July 18, 2014, has a design capacity greater than 2.5 million cubic meters and 2.5 million megagrams, and are not subject to more stringent requirements in an approved and effective state or federal plan that implements 40 CFR Part 60, Subpart Cf. The facility must comply with the more stringent requirements of an effective state or federal plan and no longer has any other requirements under this subpart. At the present time, the facility is a Part 70 source and will have to meet the requirements of this subpart through 40 CFR Part 62 Subpart OOO (i.e. the FIP) or OAC 252:100-47 once the rule is revised and the state's 111(d) Plan is approved by EPA.

Subpart XXX, Municipal Solid Waste Landfills. This subpart affects each landfill that commences construction, reconstruction, or modification after July 17, 2014. This facility commenced construction prior to July 17, 2014, and has not been reconstructed or modified on or after July 17, 2014. Since the facility has not started construction on the expansion area, this facility is not subject to this subpart.

NESHAP, 40 CFR Part 61 [Subpart M Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides, or vinyl chloride.

Subpart M, National Emission Standard for Asbestos. Section 61.154, Standard for active waste disposal sites, requires each owner or operator of an active waste disposal site that receives asbestos-containing waste material from a source covered under §61.149, 61.150, or 61.155 to meet the requirements of this section. This facility is subject to this subpart because it receives asbestos-containing materials. The permit requires the facility to comply with all applicable requirements.

Federal Plan, 40 CFR Part 62 (Approval and Promulgation of State Plans for Designated Facilities and Pollutants) [Subpart OOO Applicable]

Subpart OOO, Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014. This subpart establishes emission control requirements and compliance schedules for the control of designated pollutants from certain designated municipal solid waste (MSW) landfills in accordance with section 111(d) of the Clean Air Act and subpart B of 40 CFR Part 60. This facility is subject to the federal plan in 40 CFR Part 62, Subpart OOO, implementing the emission guidelines in 40 CFR Part 60, Subpart Cf. The facility will be subject to OAC 252:100-47 and the state 111(d) plan implementing the emission guidelines upon EPA approval of said plan.

NESHAP, 40 CFR Part 63 [Subpart AAAA Applicable]

Subpart AAAA, Municipal Solid Waste Landfills. This subpart applies to all municipal solid waste landfills that are: (1) major sources as defined by 40 CFR §63.2 of Subpart A as stated in §63.1935(a)(1); (2) collocated with a major source as stated in §63.1935(a)(2); (3) area sources with a design capacity equal to or greater than 2.5 million Mg and 2.5 million m^3 and have estimated uncontrolled NMOC emissions of 50 Mg/yr as calculated according to §60.754(a) as stated in §63.1959; or (4) meeting only the design capacity threshold of 2.5 million Mg and 2.5 million m^3 but have a bioreactor and are not permanently closed as of January 16, 2003 as stated in §63.1935(b)(3). The facility is subject to this subpart according to §63.1935(a)(3). This subpart provides that compliance with the operating conditions shall be demonstrated by parameter monitoring results that are within the specified ranges. It also includes additional reporting requirements. These requirements apply since the facility has uncontrolled NMOC emissions greater than 50 Mg/yr. The permit requires the facility to comply with all applicable requirements.

CAM, 40 CFR Part 64 [Not Applicable]

This part applies to any pollutant-specific emission unit at a major source that is required to obtain an operating permit, for any application for an initial operating permit submitted after April 18, 1998, that addresses "large emissions units," or any application that addresses "large emissions units" as a significant modification to an operating permit, or for any application for renewal of an operating permit, if it meets all of the following criteria.

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard

- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY or 10/25 TPY of HAP.

The facility does not meet the applicability criteria and is therefore not an affected facility.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
This facility does not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: *www.epa.gov/rmp*.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subpart A and F Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).
Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.
Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.
The standard conditions of the permit address the requirements specified at § 82.156 for persons opening appliances for maintenance, service, repair, or disposal; § 82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; § 82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; § 82.166 for recordkeeping; § 82.158 for leak repair requirements; and § 82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

This facility does not utilize any Class I & II substances

SECTION X. COMPLIANCE

The Specific Conditions of this permit contain various testing, monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The specific method used to document compliance was based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

In addition to the permitting requirements, the following periodic inspections were conducted since issuance of the last Title V renewal permit.

Inspection Type	Date	Summary/Results
FCE	1/3/2013	No Violations
PCE	2/1/2022	No Violations

There have been no other enforcement actions since issuance of the last Title V renewal permit.

SECTION XI. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

Tier Classification

This application has been determined to be a **Tier II** based on the request for renewal of a Part 70 permit.

Landowner Notification

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the real property.

Public Review

The applicant published the "Notice of Filing a Tier II Application" in the *Chickasha Express-Star* newspaper, a daily local newspaper in Grady County on February 23, 2023. The notice stated that the application was available for review at the Chickasha Public Library, 527 Iowa Avenue, Chickasha, Oklahoma, and also at the Air Quality Division's main office in Oklahoma City. The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at https://www.deq.ok.gov.

The applicant will publish the "Notice of Tier II Draft Permit" as a legal notice in a newspaper of general circulation in the area where the source is located. The notice of draft permit will state that the draft permit will be available for public review at a location in the county where the facility is located, and that the draft permit will also be available for public review at the Air Quality Division main office and on the Air Quality section of the DEQ web page at https://www.deq.ok.gov. The draft permit will be available for a 30-day public review period. EPA and Tribal nations will be notified of the draft permit.

Information on all permit actions is available for review by the public in the Air Quality Section of

the DEQ Web Page. https://www.deq.ok.gov.

EPA Review

The applicant requested and was granted concurrent public and EPA review periods. The draft/proposed permit will be sent to EPA for a 45-day review period. If there are no public comments the draft/proposed permit will be deemed the proposed permit.

Public Petition

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of OAC 252:100-8-8(j) may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under OAC 252:100-8-8(j), the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under OAC 252:100-8-8(j), the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the real property.

Environmental Justice Review

Environmental Justice is a federal initiative. Industrial facilities tend to be built on the cheapest land available. The surrounding population tends to be low-income citizens, and there tends to be a higher proportion of minorities in that surrounding area. Those low-income / minority citizens experience the highest impacts of air pollution coming from the adjacent industrial facilities.

Environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no population bears a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or from the execution of federal, state, and local laws; regulations; and policies. Meaningful involvement requires effective access to decision makers for all, and the ability in all communities to make informed decisions and take positive actions to produce environmental justice for themselves.

The following pages detail how the Department of Energy (DOE) implements environmental justice within the Department.

- Community Engagement Initiatives
- DOE Environmental Justice Documents and Publications
- DOE Environmental Justice Frequently Asked Questions
- DOE Environmental Justice Strategy Updates/Revisions
- History of Environmental Justice at the Department of Energy
- Place-based Initiatives
- Resources to Overburdened, Underserved, and Economically Distressed Communities
- Youth/Student Opportunities

EPA has prepared a screening tool, EJSCREEN, which incorporates census data to show the demographics adjacent to a facility. Twelve criteria have been identified to determine whether a disproportionate impact is occurring on nearby minority populations. These include eleven indexes from EJSCREEN and a demographic indicator with respect to people of color. When those impacts exceed the 80% percentile, additional public participation is warranted.

The indexes in the EJ Screening tool to be considered are the following:

- Particulate Matter 2.5
- Ozone
- Diesel Particulate Matter
- Air Toxic Cancer Risk
- Air Toxic Respiratory Hazard Index
- Traffic Proximity
- Lead Paint, this addresses lead paint based on number of homes built <1960
- Superfund proximity
- Risk management plan (RMP) facility proximity
- Hazardous waste proximity
- Underground storage tanks (UST) and leaking UST (LUST)
- People of Color

The following table shows the EJSCREEN finding for a 1.0 mile buffer surrounding the location of the plant.

Criterion	**Screening Level of Concern**	**State Percentile**	**USA Percentile**
$PM_{2.5}$	80th Percentile	36	66
Ozone	80th Percentile	35	58
Diesel Particulate Matter	80th Percentile	11	9
Air Toxic Cancer Risk	80th Percentile	1	5
Air Toxic Respiratory Hazard Index	80th Percentile	11	31
Traffic Proximity	80th Percentile	15	8
Lead Paint	80th Percentile	56	47
Superfund Proximity	80th Percentile	76	41
Risk Management Plan Facility Proximity	80th Percentile	45	52

Criterion	Screening Level of Concern	State Percentile	USA Percentile
Hazardous Waste Proximity	80th Percentile	28	12
Underground storage tanks (UST)	80th Percentile	18	23
People of Color	80th Percentile	20	36

As shown above, all screening criteria are below the screening levels of concern.

Fees Paid

Part 70 operating permit renewal application fee of $7,500 was received on February 21, 2023.

SECTION IX. SUMMARY

The landfill facility was constructed and is operating as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility. Issuance of the operating permit is recommended, contingent on public, tribal, and EPA review.

PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Oklahoma Landfill Holdings, Inc. **Permit No. 2023-0135-TVR4**
Southern Plains Landfill

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on February 17, 2023. The Evaluation Memorandum dated October 10, 2023, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein.

1. The permittee shall be authorized to operate the 8,596,074 Mg design capacity facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)]

2. Collected LFG shall be routed to an open flare (utility flare) for combustion. The open flare shall be operated in accordance with 40 CFR §60.18. [OAC 252:100-8-6(a)]

3. When LFG is routed to the utility flare, the following conditions shall apply.

   a. Permittee shall properly operate and maintain the flare in accordance with current industry standards.
   b. The flare shall achieve a control efficiency of 98%.
   c. The flare shall have an alarm system to notify operators of pilot malfunction.
   d. Records that document proper maintenance, malfunctions and repairs shall be maintained.

4. The facility is subject to 40 CFR Part 62, Subpart OOO, Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014. The permittee shall comply with all applicable standards contained therein, including but not limited to:
   [40 CFR Part 62, §62.16710 – §62.16730]

   a. §62.16710 Scope and delegated authorities
   b. §62.16711 Designated Facilities
   c. §62.16712 Compliance Schedule and Increments of progress
   d. §62.16714 Standards for municipal solid waste emissions
   e. §62.16716 Operational Standards for collection and control systems
   f. §62.16718 Test methods and procedures
   g. §62.16720 Compliance provisions
   h. §62.16722 Monitoring of Operations
   i. §62.16724 Reporting Guidelines
   j. §62.16726 Recordkeeping Guidelines
   k. §62.16728 Specifications for active collection systems
   l. §62.16730 Definitions
   m. Alternatives as outlined in the Design Plan

5. The facility is subject to NESHAP (National Emission Standards for Hazardous Air Pollutants), 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos. The permittee shall comply with all applicable standards contained therein, including but not limited to: [40 CFR Part 61, §61.140 - §61.157]

   a. §61.140 Applicability.
   b. §61.141 Definitions.
   c. §61.151 Standard for inactive waste disposal sites for asbestos mills and manufacturing and fabricating operations.
   d. §61.153 Reporting.
   e. §61.154 Standard for active waste disposal sites.
      (1) There must be no visible emissions to the outside air from any active waste disposal site where asbestos-containing waste has been deposited or [§61.154(a)]
         (i) At the end of each operating day, or at least once every 24-hour period while the site is in continuous operation, the asbestos-containing waste material that has been deposited at the site during the operating day or previous 24-hour period shall be covered with at least 15 centimeters (6 inches) of compact non-asbestos-containing material. [§61.154(c)(1)]
         (ii) Use an alternative emissions control method that has received prior written approval by DEQ. [§61.154(d)]
      (2) For all asbestos-containing waste material received, the permittee shall:
         (i) Maintain waste shipment records including following information: [§61.154(e)(1)]
            (A) The name, address, and telephone number of the waste generator.
            (B) The name, address, and telephone number of the transporter(s).
            (C) The quantity of the asbestos-containing waste material in cubic meters (cubic yards).
            (D) The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material nor sealed in leak-tight containers. Report in writing to the local, State, or EPA regional office.
            (E) The date of receipt.
         (ii) As soon as possible (less than 30 days) after receipt of the waste, send a copy of the signed waste shipment record to the waste generator. [§61.154(e)(2)]
         (iii) Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and quantity acutely received, attempt to reconcile the discrepancy with the waste generator. [§61.154(e)(3)]
         (iv) Retain a copy of all records and reports for at least two years. [§61.154(e)(4)]
      (3) Maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area. [§61.154(f)]
      (4) Upon closure, comply with all the provisions of §61.151. [§61.154(g)]
      (5) Submit to DEQ, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities. [§61.154(h)]
      (6) Furnish upon request, and make records available during normal business hours for inspection by DEQ personnel. [§61.154(i)]

(7) Notify the DEQ 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. [§61.154(j)]

(i). Scheduled starting and completion dates.
(ii). Reason for disturbing the waste.
(iii). Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material
(iv). Location of any temporary storage site and the final disposal site.

f. §61.156 Cross-reference to other asbestos regulations.
g. §61.157 Delegation of authority.

6. The facility is subject to NESHAP (National Emission Standards for Hazardous Air Pollutants), 40 CFR Part 63, Subpart AAAA, Municipal Solid Waste Landfills. The permittee shall comply with all applicable standards contained therein, including but not limited to: [40 CFR Part 63, §63.1930 – §63.1990]

What This Subpart Covers

a. §63.1930 What is the purpose of this subpart?
b. §63.1935 Am I subject to this subpart?
c. §63.1940 What is the affected source of this subpart?
d. §63.1945 When do I have to comply with this subpart?
e. §63.1947 When do I have to comply with this subpart if I own or operate a bioreactor?
f. §63.1950 When am I no longer required to comply with this subpart?
g. §63.1952 When am I no longer required to comply with the requirements of this subpart if I own or operate a bioreactor?

Standards

h. §63.1955 What requirements must I meet?

(1) Compliance with the requirements in 40 CFR §63.1960 through §63.1985 and with the general provisions specified in Table 1 of 40 CFR Part 63, Subpart AAAA. [§63.1955(b)]

(2) For approval of collection and control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions, you must follow the procedures in 40 CFR §60.752(b)(2). If alternatives have already been approved under 40 CFR Part 60 subpart WWW or the Federal plan, or EPA approved and effective State or tribal plan, these alternatives can be used to comply with this subpart, except that all affected sources must comply with the Startup, Shutdown, and Malfunction (SSM) requirements in 40 CFR Part 63 Subpart A of this part as specified in Table 1 of the NESHAP and all affected sources must submit compliance reports every 6 months as specified in §63.1980(a) and (b), including information on all deviations that occurred during the 6-month reporting period. Deviations for continuous emission monitors or numerical continuous parameter monitors must be determined using a 3 hour monitoring block average. [§63.1955(c)]

i. §63.1957 Requirements for gas collection and control system installation and removal.
j. §63.1958 Operational standards for collection and control systems.
k. §63.1959 NMOC calculation procedures.
l. §63.1960 Compliance provisions.
m. §63.1961 Monitoring of operations.
n. §63.1962 Specifications for active collection systems.

General and Continuing Compliance Requirements

o. §63.1964 How is compliance determined?
p. §63.1965 What is a deviation?
   (1) A deviation occurs when the control device operating parameter boundaries described in 40 CFR §63.1983(c)(1) are exceeded. [§63.1965(a)]
   (2) A deviation occurs when 1 hour or more of the hours during the 3-hour block averaging period does not constitute a valid hour of data. A valid hour of data must have measured values for at least three 15-minute monitoring periods within the hour. [§63.1965(b)]

q. §63.1975 How do I calculate the 3-hour block average used to demonstrate compliance?

Notifications, Records, and Reports

r. §63.1981 What records must I submit?
s. §63.1982 What records and reports must I submit and keep for bioreactors or liquids addition other than leachate?
t. §63.1983 What records must I keep?

Other Requirements and Information

u. §63.1985 Who enforces this subpart?
v. §63.1990 What definitions apply to this subpart?

7. The permittee shall take reasonable precautions to minimize fugitive dust from traffic on paved/unpaved road and all activities. These precautions shall include, but are not limited to: [OAC 252:100-29-3]

   a. The use, where possible, of water or chemicals for control of dust in the grading of roads, driveways and parking lots or the clearing of land. [OAC 252:100-29-3(1)]
   b. The application of water or suitable chemicals or some other covering on surfaces that can create air-borne dusts under normal conditions. [OAC 252:100-29-3(2)]
   c. The covering or wetting of open-bodied trucks, trailers, or railroad cars when transporting dusty materials in areas where the general public must have access. [OAC 252:100-29-3(4)]
   d. The planting and maintenance of vegetative ground cover as necessary. [OAC 252:100-29-3(5)]

8. The following records of hours, quantity, or capacity shall be maintained on-site sufficient to demonstrate that the insignificant sources qualify as insignificant activities. Records are not required for trivial activities. [OAC 252:100-8-6(a)(3)(B)]

a. Activities having the potential to emit ≤ 5.0 TPY (actual) of any criteria pollutant. List the activity with estimated actual annual emissions.
b. Throughput of diesel fuel from 10,000-gallon storage tank (throughput ≤ 2,175 gallons/day).
c. .Leachate pond (Trivial Activity)

9. The permittee shall maintain records of operations as listed below. These records shall be retained on-site or at a local field office for a period of at least five years following dates of recording, and shall be made available to regulatory personnel upon request.
[OAC 252:100-8-6 (a)(3)(B)]

a. Records as required by Federal Plan, 40 CFR 62 Subpart OOO.
b. Records as required by NESHAP, 40 CFR Part 61, Subpart M.
c. Records as required by NESHAP, 40 CFR Part 63, Subpart AAAA.

10. No later than 30 days after each anniversary date of the issuance of the original Title V permit for this facility (No. 99-411-TV, March 6, 2003), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6 (c)(5)(A) & (D)]

11. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit (Permit No. 99-411-TV, March 6, 2003), the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report.
[OAC 252:100-8-6 (a)(3)(C)(i) and (ii)]

12. If the facility applies through the Oklahoma DEQ Land Protection Division for an expansion to the permitted volume design capacity of the landfill, the facility shall apply for an Air Quality major source construction permit prior to beginning construction on the horizontal or vertical expansion. [OAC 252:100-8-4(a)(1)(B)]

13. This permit supersedes all previous Air Quality operating permits for this facility which are now canceled.

TITLE V (PART 70) PERMIT TO OPERATE / CONSTRUCT
STANDARD CONDITIONS
(June 21, 2016)

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.
[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements.
[OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

(1) the date, place and time of sampling or measurement;
(2) the date or dates analyses were performed;
(3) the company or entity which performed the analyses;
(4) the analytical techniques or methods used;
(5) the results of such analyses; and
(6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report. [OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions. [OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act. [OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. [OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM_{10}). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period; and a statement that the facility will continue to comply with all applicable requirements. [OAC 252:100-8-6(c)(5)(C)(i)-(iv)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery. [OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification. [OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.
[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
[OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege.
[OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing,

terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.
[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.
[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.
[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.
[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

(1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
(2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
(3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
(4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d). [OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The

notification should include any changes which may alter the status of a "grandfathered source," as defined under AQD rules. Such changes may require a permit modification.
[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

(1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
(2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
(3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
(4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.
[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.
[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that:

(1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
(2) the permitted facility was at the time being properly operated;
(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit. [OAC 252:100-8-6 (e)(2)]

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

(1) 5 tons per year of any one criteria pollutant.
(2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.
[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.
[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

(1) result in no net emissions increases,
(2) are not modifications under any provision of Title I of the federal Clean Air Act, and
(3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

(1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]

(2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]

(3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for:
   (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
   (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
   (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
   (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and

the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property. [OAC 252:100-25]

(4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

(5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

(6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]

(7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances:

(1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
(2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
(3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs. [40 CFR 82, Subpart A]

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

(1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
(2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
(3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
(5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

(1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
(2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
(3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
(4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R.§ 70.8(a) and (c).
(5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
(6) The DEQ complies with 40 C.F.R. § 70.8(d).
(7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).

(8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
(9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).
(10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

PART 70 PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 NORTH ROBINSON, SUITE 4100
P. O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2023-0135-TVR4

Oklahoma Landfill Holdings, Inc.,

having complied with the requirements of the law, is hereby granted permission to operate their Southern Plains Landfill Facility located at 3198 Country Street 2910, Ninnekah, Oklahoma 73067, NE/4 of Section 3, Township 5N, Range 6W, Ninnekah, Grady County, Oklahoma, subject to Major Source Standard Conditions dated June 21, 2016, and Specific Conditions, both attached.

This permit shall expire five (5) years from the issuance date below, except as authorized under Section VIII of the Standard Conditions.

DRAFT/PROPOSED

Kendal Stegmann, Division Director **Date**

Scott A. Thompson
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Mr. Jeff Bedick, District Manager
Oklahoma Landfill Holdings, Inc.
P.O. Box 355
Alex, Oklahoma 73002

SUBJECT: Title V Operating Permit Modification Application **No. 2023-0135-TVR4**
Oklahoma Landfill Holdings, Inc.
Southern Plains Landfill (Facility ID: 3386)
3198 Country Street 2910, Ninnekah, OK 73067
Latitude N 34.92778°, Longitude W 97.81166°
Section 3, Township 5N, Range 6W, Ninnekah, Grady County, Oklahoma
Permit Writer: Iftekhar Hossain

Dear Mr. Bedick:

Enclosed is the permit authorizing operation of the referenced facility above. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

If we may be of further service, or you have any questions, please refer to the permit number above and contact the permit writer at e-mail iftekhar.hossain@deq.ok.gov or at (405) 702-4199. Thank you for your cooperation.

Sincerely,

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Enclosures

Scott A. Thompson
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Chickasaw Nation
Attn: Bill Anoatubby, Governor
P.O. Box 1548
Ada, OK 74821

Re: Title V Operating Permit Modification Application **No. 2023-0135-TVR4**
Oklahoma Landfill Holdings, Inc.
Southern Plains Landfill (Facility ID: 3386)
3198 Country Street 2910, Ninnekah, OK 73067
Latitude N 34.92778°, Longitude W 97.81166°
Section 3, Township 5N, Range 6W, Ninnekah, Grady County, Oklahoma
Permit Writer: Iftekhar Hossain
Date Received: November 23, 2021

Dear Mr. Anoatubby:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II/Tier III application referenced above. A Tier II/III application requires the facility provide a 30-day public comment period on the draft Tier II/III permit and a 20-day public comment period on a proposed Tier III permit at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

Copies of draft permits and comment opportunities are also provided to the public on the ODEQ website at the following location:

https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Scott A. Thompson
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Mr. Jeff Bedick, District Manager
Oklahoma Landfill Holdings, Inc.
P.O. Box 355
Alex, Oklahoma 73002

SUBJECT: Title V Operating Permit Modification Application **No. 2023-0135-TVR4**
Oklahoma Landfill Holdings, Inc.
Southern Plains Landfill (Facility ID: 3386)
3198 Country Street 2910, Ninnekah, OK 73067
Latitude N 34.92778°, Longitude W 97.81166°
Section 3, Township 5N, Range 6W, Ninnekah, Grady County, Oklahoma
Permit Writer: Iftekhar Hossain

Dear Mr. Bedick:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which **you** must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing;**
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation in this matter. If we may be of further service, or you have any questions about this permit, please contact the permit writer at Iftekhar.hossain@deq.ok.gov or me at (405) 702-4100.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

NOTICE OF DRAFT PERMIT
TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
   Version 1 – Traditional NSR process for a construction permit
   Version 2 – Enhanced NSR process for a construction permit
   Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICES: **Version 1 on page 2.**
Version 2 on page 3.
Version 3 on page 4.

SAMPLE NOTICE *(Italicized print is to be filled in by the applicant.)***:**

DEQ NOTICE OF TIER *…II or III…* **DRAFT PERMIT**

A Tier *…II or III…* **application for an air quality** *…type of permit or permit action being sought (e.g., significant modification to a Title V permit or Title V/Title V renewal permit)…* **has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant,** *…name and address.*

The applicant requests approval to *…brief description of purpose of application…* **at the** *…site/facility name … …***[proposed to be] located at** *…physical address (if any), driving directions, and legal description including county…***..**

In response to the application, DEQ has prepared a draft operating permit [modification] (Permit Number: *…xxxx-xxxx-x…***), which may be reviewed at** *…locations (one must be in the county where the site/facility is located)…* **or at the Air Quality Division's main office (see address below). The draft permit is also available for review under Permits for Public Review on the DEQ Web Page: http://www.deq.ok.gov/**

This draft permit would authorize the facility to emit the following regulated pollutants: *(list each pollutant and amounts in tons per year (TPY))* [For facility modifications only, either add**: , which represents** (*identify the emissions change involved in the modification)*, or add: **. The modification will not result in a change in emissions**]

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below or as directed through the corresponding online notice. [Modifications only, add: **Only those issues relevant to the proposed modification(s) are open for comment.**] **A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.**

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8.

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45-day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j).

Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are available in the Air Quality section of the DEQ Web page: http://www.deq.ok.gov/.

For additional information, contact *…names, addresses and telephone numbers of contact persons for the applicant,* **or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.**

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-10-21

ACFM	Actual Cubic Feet per Minute
AD	Applicability Determination
AFRC	Air-to-Fuel Ratio Controller
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAE	Baseline Actual Emissions
BBL	Barrel(s)
BHP	Brake Horsepower (bhp)
BTU	British thermal unit (Btu)
C&E	Compliance and Enforcement
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CAAA	Clean Air Act Amendments
CC	Catalytic Converter
CCR	Continuous Catalyst Regeneration
CD	Consent Decree
CEM	Continuous Emission Monitor
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CI	Compression Ignition
CNG	Compressed Natural Gas
CO	Carbon Monoxide or Consent Order
COA	Capable of Accommodating
COM	Continuous Opacity Monitor
D	Day
DEF	Diesel Exhaust Fluid
DG	Demand Growth
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)
EGU	Electric Generating Unit
EI	Emissions Inventory
EPA	Environmental Protection Agency
ESP	Electrostatic Precipitator
EUG	Emissions Unit Group
EUSGU	Electric Utility Steam Generating Unit
FCE	Full Compliance Evaluation
FCCU	Fluid Catalytic Cracking Unit
FESOP	Federally Enforceable State Operating Permit
FIP	Federal Implementation Plan
FR	Federal Register
GACT	Generally Achievable Control Technology
GAL	Gallon (gal)
GDF	Gasoline Dispensing Facility
GEP	Good Engineering Practice
GHG	Greenhouse Gases
GR	Grain(s) (gr)
H_2CO	Formaldehyde
H_2S	Hydrogen Sulfide
HAP	Hazardous Air Pollutants
HC	Hydrocarbon
HCFC	Hydrochlorofluorocarbon
HFR	Horizontal Fixed Roof
HON	Hazardous Organic NESHAP
HP	Horsepower (hp)
HR	Hour (hr)
I&M	Inspection and Maintenance
IBR	Incorporation by Reference
ICE	Internal Combustion Engine
LAER	Lowest Achievable Emission Rate
LB	Pound(s) [Mass] (lb, lbs, lbm)
LB/HR	Pound(s) per Hour (lb/hr)
LDAR	Leak Detection and Repair
LNG	Liquefied Natural Gas
LT	Long Ton(s) (metric)
M	Thousand (Roman Numeral)
MAAC	Maximum Acceptable Ambient Concentration
MACT	Maximum Achievable Control Technology
MM	Prefix used for Million (Thousand-Thousand)
MMBTU	Million British Thermal Units (MMBtu)
MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
MMSCF	Million Standard Cubic Feet (MMscf)
MMSCFD	Million Standard Cubic Feet per Day
MSDS	Material Safety Data Sheet
MWC	Municipal Waste Combustor
MWe	Megawatt Electrical
NA	Nonattainment
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NH_3	Ammonia
NMHC	Non-methane Hydrocarbon
NGL	Natural Gas Liquids

NO_2	Nitrogen Dioxide
NOx	Nitrogen Oxides
NOI	Notice of Intent
NSCR	Non-Selective Catalytic Reduction
NSPS	New Source Performance Standards
NSR	New Source Review
O_3	Ozone
O&G	Oil and Gas
O&M	Operation and Maintenance
O&NG	Oil and Natural Gas
OAC	Oklahoma Administrative Code
OC	Oxidation Catalyst
PAH	Polycyclic Aromatic Hydrocarbons
PAE	Projected Actual Emissions
PAL	Plant-wide Applicability Limit
Pb	Lead
PBR	Permit by Rule
PCB	Polychlorinated Biphenyls
PCE	Partial Compliance Evaluation
PEA	Portable Emissions Analyzer
PFAS	Per- and Polyfluoroalkyl Substance
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers
PM_{10}	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers
POM	Particulate Organic Matter or Polycyclic Organic Matter
ppb	Parts per Billion
ppm	Parts per Million
ppmv	Parts per Million Volume
ppmvd	Parts per Million Dry Volume
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
psig	Pounds per Square Inch Gage
RACT	Reasonably Available Control Technology
RATA	Relative Accuracy Test Audit
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement
RFG	Refinery Fuel Gas
RICE	Reciprocating Internal Combustion Engine
RO	Responsible Official
ROAT	Regional Office at Tulsa
RVP	Reid Vapor Pressure
SCC	Source Classification Code
SCF	Standard Cubic Foot
SCFD	Standard Cubic Feet per Day
SCFM	Standard Cubic Feet per Minute
SCR	Selective Catalytic Reduction
SER	Significant Emission Rate
SI	Spark Ignition
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SNCR	Selective Non-Catalytic Reduction
SO_2	Sulfur Dioxide
SOx	Sulfur Oxides
SOP	Standard Operating Procedure
SRU	Sulfur Recovery Unit
T	Tons
TAC	Toxic Air Contaminant
TEG	Triethylene Glycol
THC	Total Hydrocarbons
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulates
TV	Title V of the Federal Clean Air Act
$\mu g/m^3$	Micrograms per Cubic Meter
US EPA	U. S. Environmental Protection Agency
VFR	Vertical Fixed Roof
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VRT	Vapor Recovery Tower
VRU	Vapor Recovery Unit
YR	Year
2SLB	2-Stroke Lean Burn
4SLB	4-Stroke Lean Burn
4SRB	4-Stroke Rich Burn