

STATEMENT OF BASIS
Pineview Landfill
Walker, County
Facility No. 414-0013

Introduction

BFI Waste Systems of Alabama, LLC has applied for renewal of Major Source Operating Permit (MSOP) No. 414-0013 for the Pineview Landfill. This proposed Title V MSOP renewal has been developed in accordance with the provisions of ADEM Admin Code r. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of the permit.

The facility originally began operations in 1993. The initial Title V MSOP was issued on November 20, 2000, and this is the fourth renewal. The current MSOP expired on August 28, 2021, but the renewal application was received on February 26, 2021. ADEM Admin. Code r. 335-3-16-12(c) states “If a timely and complete application for a permit renewal is submitted, but the Department fails to take final action to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied and any permit shield granted for the permit shall continue in effect during that time”; therefore the current MSOP was administratively continued.

The facility is located in Walker County, which is currently listed as attainment/unclassifiable with all National Ambient Air Quality Standard (NAAQS).

There are no current or ongoing enforcement actions against Pineview Landfill necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov/> (Search using Facility ID AL0000000112900024).

Potential emissions are as follows:

Pollutant	Potential Emissions (tpy)
PM ₁₀	62.68
SO ₂	68.81
NO _x	37.95
CO (Uncontrolled)	197.19
NMOC (Fugitive)	26.09
NMOC (From Flare)	2.77
VOC	9.05
HAPs	9.69

No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

Requirements

X001: MSW Landfill

The landfill is currently subject to 40 CFR 62, Subpart OOO-Federal Plan Requirements for Municipal Solid Waste (MSW) Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014, because it has a design capacity greater than both 2.5 million megagrams and 2.5 million cubic meters. It will become subject to ADEM Chapter 335-3-19 Control of Municipal Solid Waste Landfill Gas Emissions (once effective) because it has a design capacity greater than 2.5×10^6 cubic meters and 2.5×10^6 Megagrams and has not commenced construction, reconstruction, or modification after July 17, 2014. Previously it was subject to 40 CFR 60, Subpart WWW-Standards of Performance for Municipal Solid Waste Landfills. In 2000, Pineview's uncontrolled NMOC emissions exceeded the 50 Megagrams per year threshold it was previously subject to under Subpart WWW, and the facility has thus installed a gas collection and control system (GCCS) and is subject to the operational standards, and monitoring, recordkeeping, and reporting requirements for a GCCS.

Because the NMOC emissions have exceeded 50 Megagrams per year, Pineview is also subject to Subpart AAAA, National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills. This includes any alternatives to operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping, or reporting provisions which have already been approved under subpart WWW. Subpart AAAA also requires MSW landfills to keep the records and reports specified in the general provisions of 40 CFR part 60. Recent changes to Subpart AAAA include an operating temperature increase for gas field wells from 131 F to 145 F, an end to meeting an oxygen standard of 5% or less, though monitoring is still required, and changes to the procedures for correcting exceedances. The startup, shutdown, and malfunction (SSM) requirements no longer apply as of September 27, 2021. The standards of AAAA will still apply during SSM and instances of SSM will be reported in the semiannual report instead of a separate SSM report. Alternatives approved under WWW can still be used to comply with AAAA. AAAA also introduced changes to the timelines for correcting exceedances of the operating parameters as well as changes to the procedures to be followed in situations where more than fifteen days may be required to correct a parameter exceedance.

In addition to the requirements of the Federal Rule, ADEM Chapter 335-3-19, and NESHAP, the flare is also subject to the requirements of 40 CFR 60.18 covering general control device and work practice requirements.

X002: MSW Landfill Asbestos NESHAP

The landfill has also accepted waste containing asbestos, making it subject to the NESHAP 40 CFR 61, Subpart M: National Emission Standard for Asbestos. Subpart M contains standards for covering asbestos containing waste and details the records that must be kept and reports that must be submitted on asbestos containing waste.

X003: Emergency Generator

Pineview has a 230 brake horsepower emergency generator to power the flare in the event of a power outage. The generator is subject to 40 CFR 60, Subpart III: Standards for Performance for Stationary Compression Ignition Internal Combustion Engines. According to the emissions standards for owners and operators in 60.4205(b), the stationary internal combustion engines are required to meet emission standards in 60.4202 of the subpart. Section 60.4202 requires that the manufacturer certify the engine to the emissions standards in 60.4202(a)(2). Pineview has provided documentation of the engine's certification. Section 60.4207(b) requires the facility is use diesel fuel that meets the requirements of 40 CFR 80.510(b). Because the engine is certified, it is not required to have a non-resettable hour meter. However, the application notes that the engine has one. The facility is subject to the compliance requirements listed in 60.4211(a), which covers operation of the engine; 60.4211(c), which requires the purchasing of a certified engine and that installation be done according to manufacturer's specifications; and 60.4211(f), which concerns how the engine must be operated in order for it to be considered an emergency engine. Pineview is not required to perform testing in order to demonstrate compliance because the facility is using a certified engine. The facility does not meet any of the thresholds triggering the need for an annual report as required in 60.4214(d). The engine is also subject to the RICE MACT as listed in 40 CFR Part 63.6580, Subpart ZZZZ. However, because the brake horsepower is less than 500 hp, no additional requirements apply for the engine.

PSD

The potential VOC emissions from the landfill are less than 250 tons per year; therefore, the facility is not subject to the Prevention of Significant Deterioration (PSD).

Monitoring of emissions

Pineview Landfill maintains records on site of the design capacity report, waste in place, year to year waste acceptance rates, and other records to show compliance with 40 CFR 63, Subpart AAAA; 40 CFR 62, Subpart OOO; and ADEM Admin. Rule R. 335-3-19 (once approved by the Environmental Protection Agency (EPA)).

The flare is monitored to ensure the continuous presence of a flame. Pineview Landfill has been granted an exemption from the requirement to monitor the gas flow rate to the flare due to the absence of a means to bypass the flare. The flare is operated in accordance with the requirements of 40 CFR 60.18.

CAM is not applicable as Pineview is subject to standards which were promulgated after November 15, 1990. According to 40 CFR 64.2(b)(1)(i), on exemptions from Compliance Assurance Monitoring, emission limitations or standards proposed after November 15, 1990 pursuant to section 111 or 112 of the Clean Air Act are exempt from CAM requirements, and there are no other source specific standards applicable to this facility.

Environmental Justice:

ADEM utilized EJSCREEN screening tool to perform an analysis of the area. (Appendix A)

Recommendation:

I recommend that the Pineview Landfill be issued the enclosed Title V permit 414-0013 with units: (X001), (X002), and (X003) for a Municipal Solid Waste Landfill with a design capacity of greater than 2.5×10^6 Megagrams with a gas collection system and flare.

John Robert Gill
Chemical Branch
Air Division

August 16, 2022

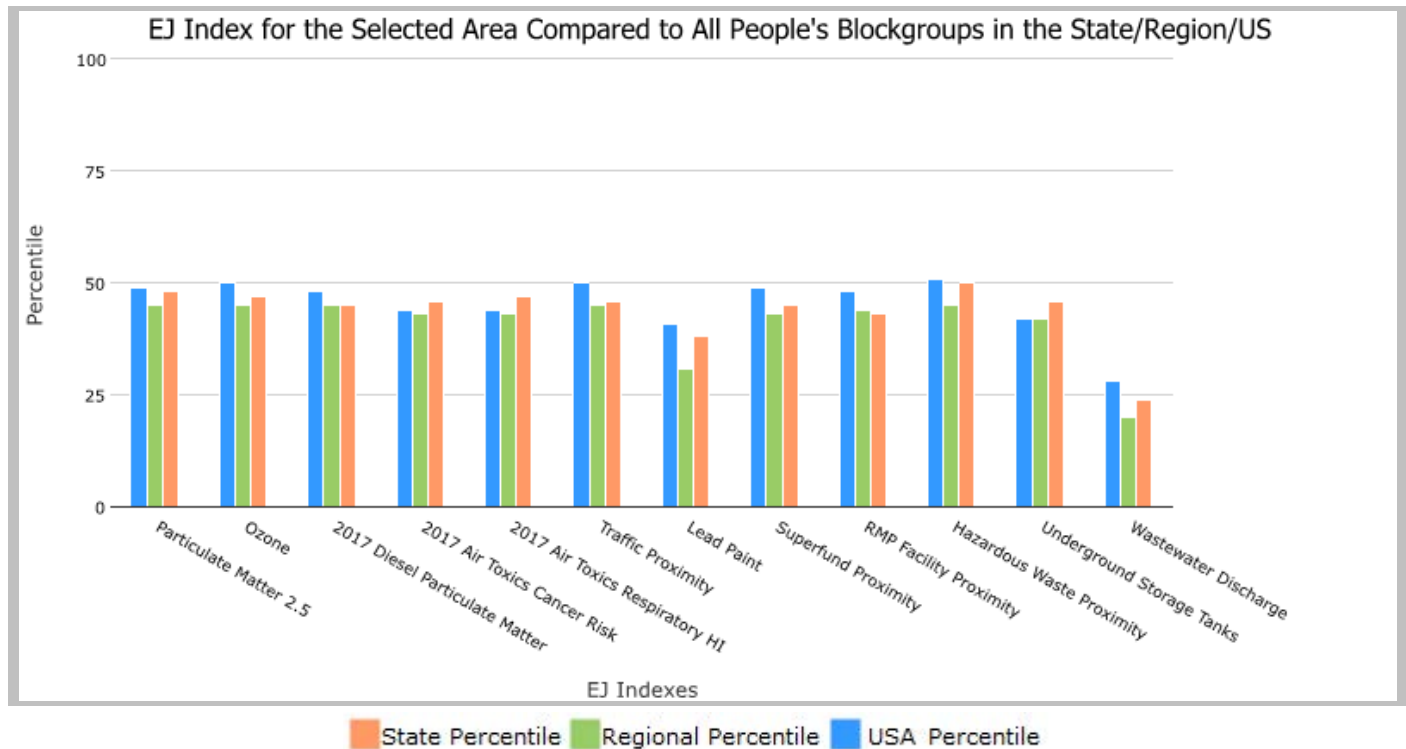
Appendix A
EJSCREEN Report

1 mile Ring Centered at 33.710904,-87.053884, ALABAMA, EPA Region 4

Approximate Population: 435

Input Area (sq. miles): 3.14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	48	45	49
EJ Index for Ozone	47	45	50
EJ Index for 2017 Diesel Particulate Matter*	45	45	48
EJ Index for 2017 Air Toxics Cancer Risk*	46	43	44
EJ Index for 2017 Air Toxics Respiratory HI*	47	43	44
EJ Index for Traffic Proximity	46	45	50
EJ Index for Lead Paint	38	31	41
EJ Index for Superfund Proximity	45	43	49
EJ Index for RMP Facility Proximity	43	44	48
EJ Index for Hazardous Waste Proximity	50	45	51
EJ Index for Underground Storage Tanks	46	42	42
EJ Index for Wastewater Discharge	24	20	28



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 33.710904,-87.053884, ALABAMA, EPA Region 4

Approximate Population: 435

Input Area (sq. miles): 3.14



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.0)



1 mile Ring Centered at 33.710904,-87.053884, ALABAMA, EPA Region 4

Approximate Population: 435

Input Area (sq. miles): 3.14

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	9.2	8.9	76	8.18	86	8.74	67
Ozone (ppb)	41.7	39.1	77	37.9	72	42.6	44
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.18	0.216	52	0.261	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	40	34	99	31	95-100th	29	95-100th
2017 Air Toxics Respiratory HI*	0.5	0.47	91	0.4	95-100th	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	24	230	24	430	19	710	14
Lead Paint (% Pre-1960 Housing)	0.12	0.18	53	0.15	62	0.28	43
Superfund Proximity (site count/km distance)	0.033	0.054	53	0.083	46	0.13	29
RMP Facility Proximity (facility count/km distance)	0.18	0.41	53	0.6	41	0.75	34
Hazardous Waste Proximity (facility count/km distance)	0.12	0.83	27	0.62	31	2.2	20
Underground Storage Tanks (count/km ²)	0.19	1.7	28	3.5	24	3.9	27
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0025	0.42	64	0.45	71	12	57
Socioeconomic Indicators							
Demographic Index	26%	36%	40	37%	37	36%	43
People of Color	12%	34%	25	39%	21	40%	24
Low Income	40%	37%	58	35%	62	31%	69
Unemployment Rate	7%	6%	66	6%	68	5%	70
Linguistically Isolated	0%	1%	70	3%	51	5%	45
Less Than High School Education	19%	14%	73	13%	77	12%	78
Under Age 5	8%	6%	75	6%	77	6%	75
Over Age 64	15%	17%	45	17%	51	16%	54

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

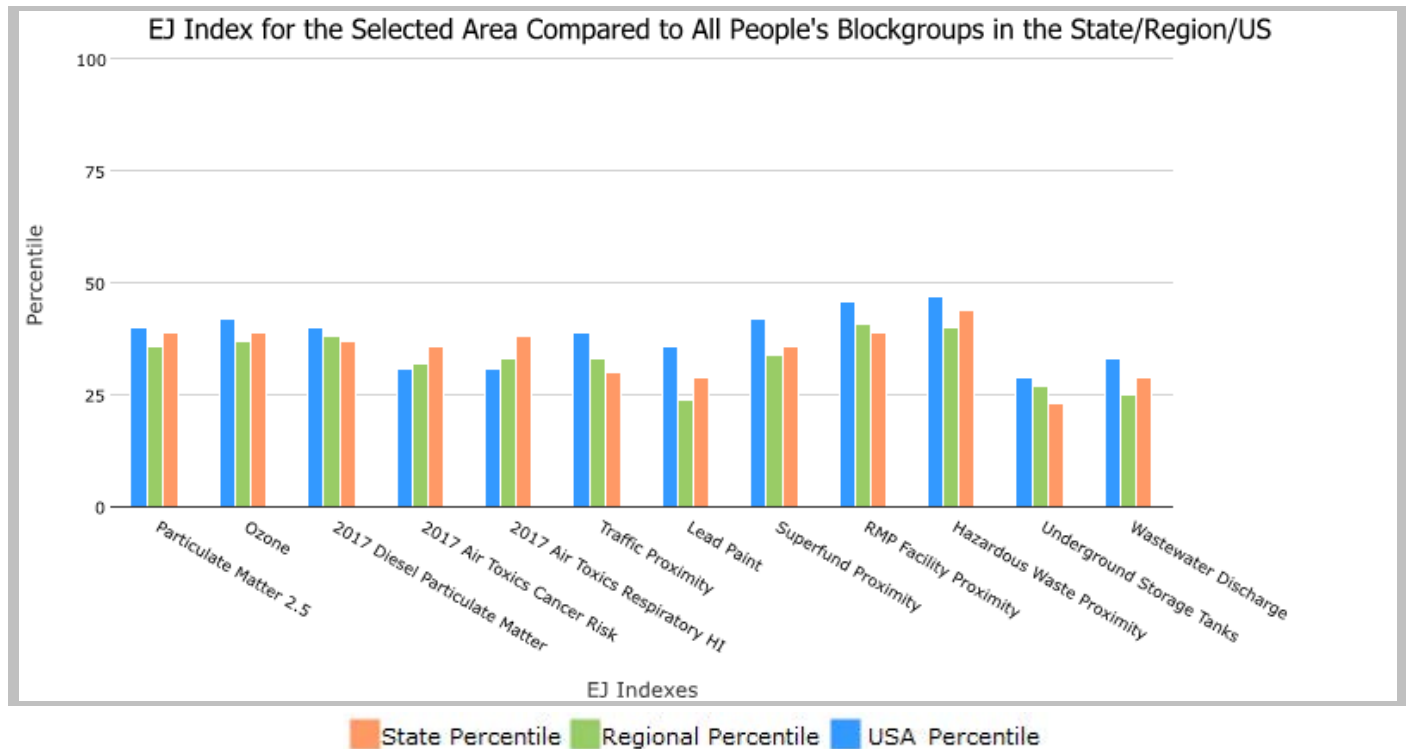
3 miles Ring Centered at 33.710904,-87.053884, ALABAMA, EPA Region 4

Approximate Population: 4,936

Input Area (sq. miles): 28.27

EJSCREEN 3 mi.

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	39	36	40
EJ Index for Ozone	39	37	42
EJ Index for 2017 Diesel Particulate Matter*	37	38	40
EJ Index for 2017 Air Toxics Cancer Risk*	36	32	31
EJ Index for 2017 Air Toxics Respiratory HI*	38	33	31
EJ Index for Traffic Proximity	30	33	39
EJ Index for Lead Paint	29	24	36
EJ Index for Superfund Proximity	36	34	42
EJ Index for RMP Facility Proximity	39	41	46
EJ Index for Hazardous Waste Proximity	44	40	47
EJ Index for Underground Storage Tanks	23	27	29
EJ Index for Wastewater Discharge	29	25	33



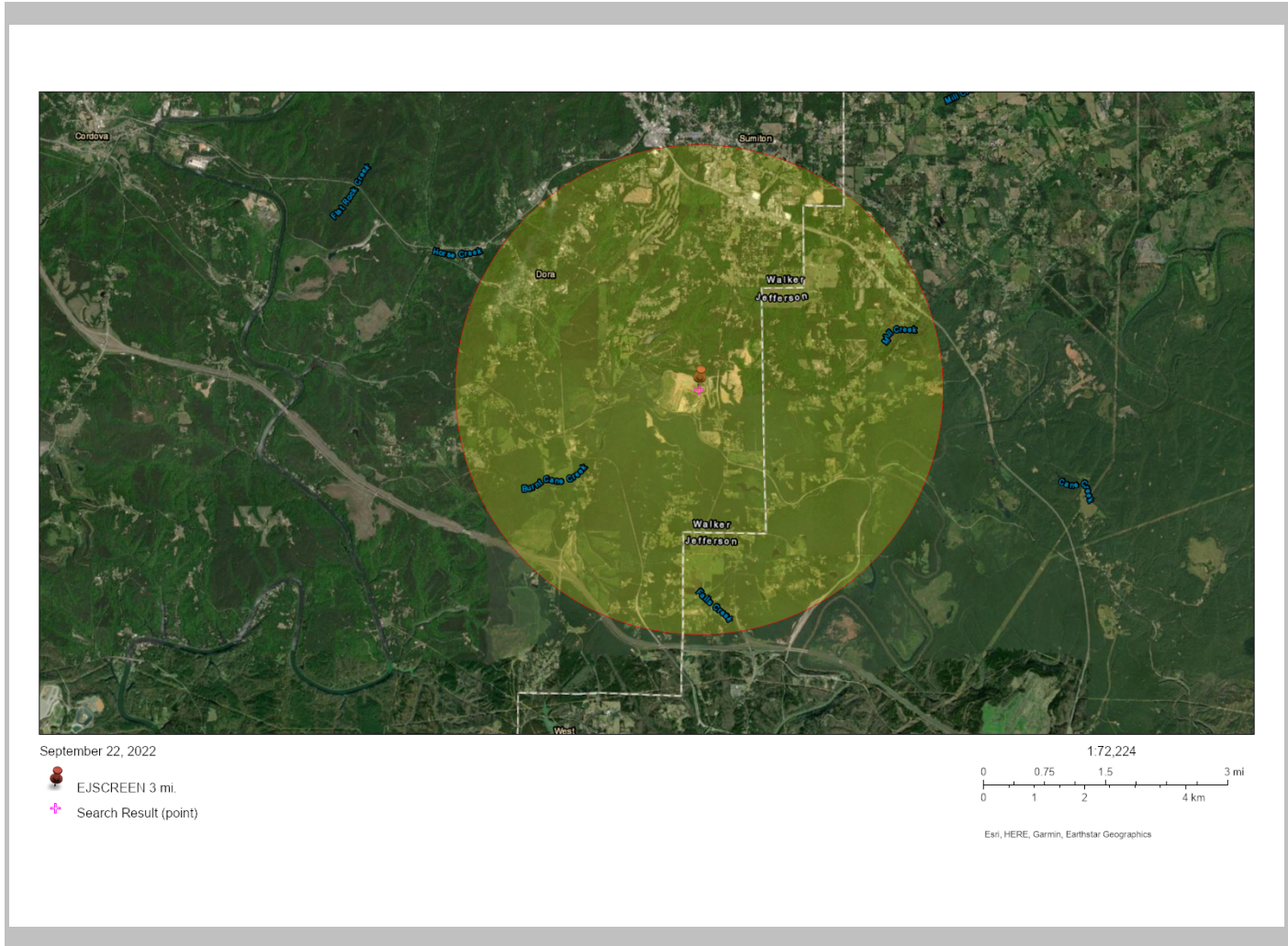
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Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

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3 miles Ring Centered at 33.710904,-87.053884, ALABAMA, EPA Region 4

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Input Area (sq. miles): 28.27

EJSCREEN 3 mi.

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	9.22	8.9	78	8.18	86	8.74	67
Ozone (ppb)	41.8	39.1	79	37.9	73	42.6	45
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.178	0.216	51	0.261	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	40	34	99	31	95-100th	29	95-100th
2017 Air Toxics Respiratory HI*	0.5	0.47	91	0.4	95-100th	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	59	230	41	430	34	710	25
Lead Paint (% Pre-1960 Housing)	0.15	0.18	62	0.15	68	0.28	47
Superfund Proximity (site count/km distance)	0.033	0.054	54	0.083	47	0.13	29
RMP Facility Proximity (facility count/km distance)	0.16	0.41	49	0.6	37	0.75	29
Hazardous Waste Proximity (facility count/km distance)	0.12	0.83	26	0.62	29	2.2	18
Underground Storage Tanks (count/km ²)	0.68	1.7	54	3.5	42	3.9	40
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0016	0.42	60	0.45	67	12	53
Socioeconomic Indicators							
Demographic Index	22%	36%	30	37%	28	36%	35
People of Color	11%	34%	23	39%	19	40%	22
Low Income	33%	37%	45	35%	50	31%	59
Unemployment Rate	7%	6%	69	6%	72	5%	74
Linguistically Isolated	0%	1%	70	3%	51	5%	45
Less Than High School Education	19%	14%	71	13%	76	12%	77
Under Age 5	5%	6%	44	6%	45	6%	43
Over Age 64	22%	17%	78	17%	77	16%	79

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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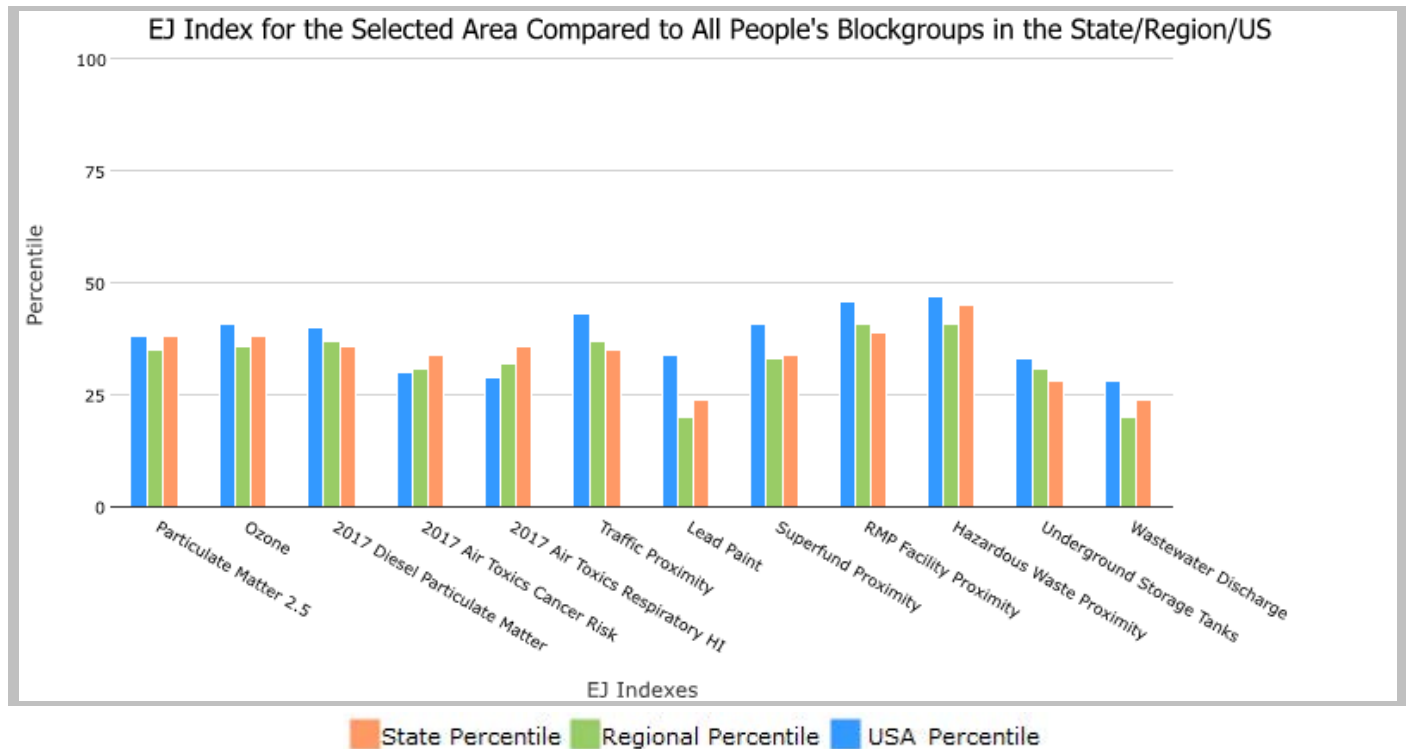
5 miles Ring Centered at 33.710904,-87.053884, ALABAMA, EPA Region 4

Approximate Population: 11,418

Input Area (sq. miles): 78.53

EJSCREEN 5 mi.

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	38	35	38
EJ Index for Ozone	38	36	41
EJ Index for 2017 Diesel Particulate Matter*	36	37	40
EJ Index for 2017 Air Toxics Cancer Risk*	34	31	30
EJ Index for 2017 Air Toxics Respiratory HI*	36	32	29
EJ Index for Traffic Proximity	35	37	43
EJ Index for Lead Paint	24	20	34
EJ Index for Superfund Proximity	34	33	41
EJ Index for RMP Facility Proximity	39	41	46
EJ Index for Hazardous Waste Proximity	45	41	47
EJ Index for Underground Storage Tanks	28	31	33
EJ Index for Wastewater Discharge	24	20	28



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

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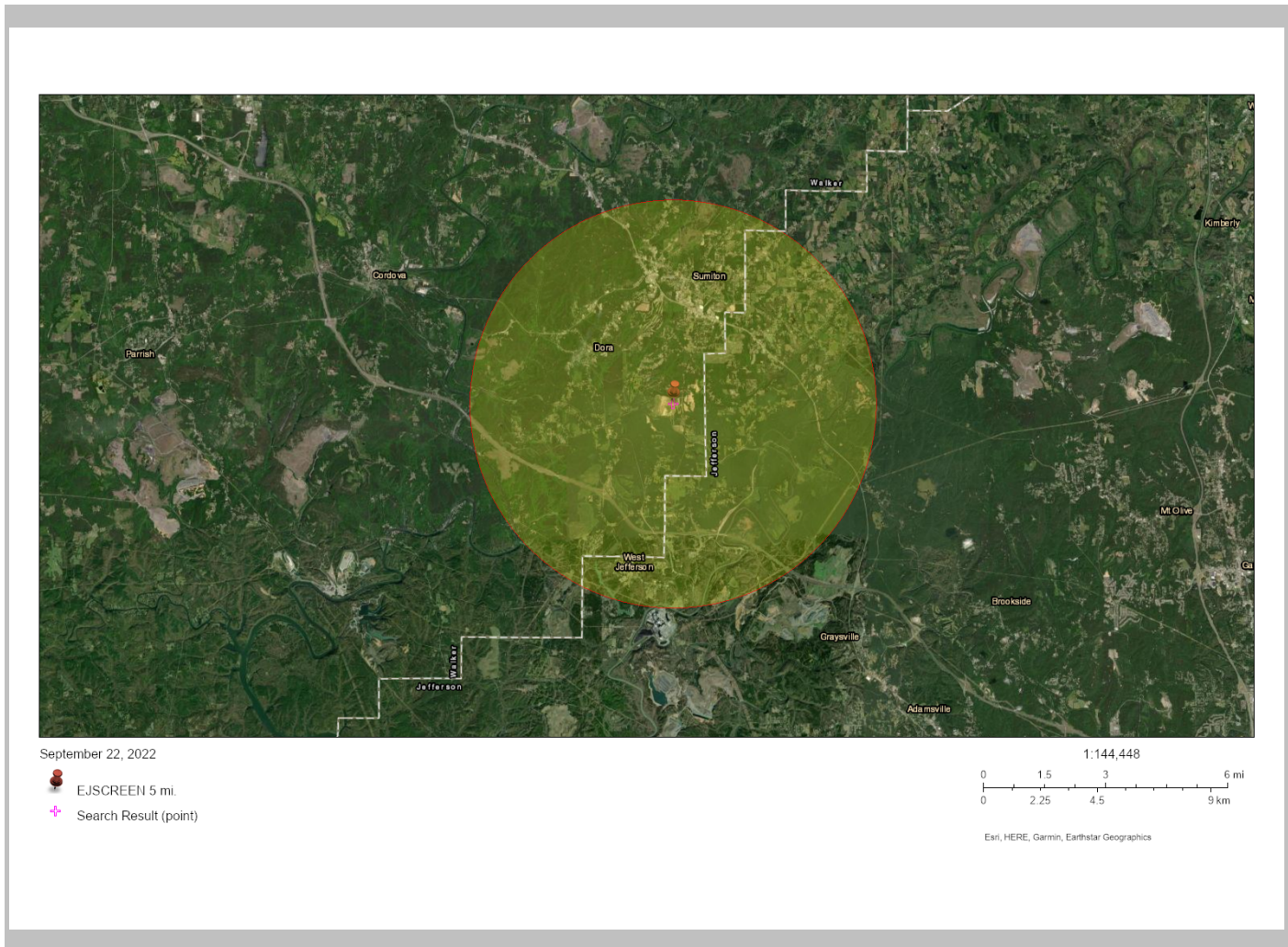


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Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	9.24	8.9	79	8.18	87	8.74	68
Ozone (ppb)	41.9	39.1	79	37.9	74	42.6	46
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.175	0.216	50	0.261	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	40	34	99	31	95-100th	29	95-100th
2017 Air Toxics Respiratory HI*	0.5	0.47	91	0.4	95-100th	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	43	230	35	430	28	710	20
Lead Paint (% Pre-1960 Housing)	0.19	0.18	69	0.15	74	0.28	52
Superfund Proximity (site count/km distance)	0.034	0.054	54	0.083	47	0.13	30
RMP Facility Proximity (facility count/km distance)	0.15	0.41	46	0.6	35	0.75	28
Hazardous Waste Proximity (facility count/km distance)	0.11	0.83	25	0.62	27	2.2	17
Underground Storage Tanks (count/km ²)	0.51	1.7	47	3.5	37	3.9	36
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0022	0.42	63	0.45	69	12	56
Socioeconomic Indicators							
Demographic Index	24%	36%	35	37%	32	36%	39
People of Color	10%	34%	21	39%	18	40%	21
Low Income	38%	37%	54	35%	58	31%	66
Unemployment Rate	9%	6%	74	6%	77	5%	79
Linguistically Isolated	0%	1%	70	3%	51	5%	45
Less Than High School Education	19%	14%	74	13%	78	12%	78
Under Age 5	5%	6%	49	6%	49	6%	47
Over Age 64	20%	17%	72	17%	72	16%	75

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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