

**STATEMENT OF BASIS**  
**Noble Hill Landfill**  
**Etowah County**  
**Facility No. 307-0053**

Introduction

Evergreen Environmental Partners, LLC has applied for a Major Source Operating Permit (MSOP) for the Noble Hill Landfill, which is a municipal solid waste (MSW) landfill. This proposed Title V MSOP issuance 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 landfill is active and originally began operations in late 2020. An application for the initial issuance of a MSOP was received on July 24, 2024. The Etowah County landfill that opened in 1981 and closed in 1993 is also part of the landfill's footprint. This area is under a final cap and the Noble Hill Landfill will eventually expand to cover this area.

The landfill is located in Attalla in Etowah County, which is in compliance with all National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Noble Hill Landfill necessitating additional requirements to achieve compliance with the proposed permit conditions.

Emissions

Actual emissions (from 2023) are as follows:

<b>Pollutant</b>	<b>Actual Emissions (tpy)</b>
PM <sub>10</sub>	40.45
PM	50.51
NH <sub>3</sub>	6.03
CO	0.28
NMOC	24.37
VOC	1.12
HAPs	1.6
Toluene	1.11

Potential emissions are as follows:

<b>Pollutant</b>	<b>Potential Emissions (tpy)</b>
PM <sub>10</sub>	52.5
PM	95.17
NH <sub>3</sub>	110.88
CO	4.63

NMOC	46.4
VOC	18.8
HAPs	12.46
Toluene	4.25

The projected emissions for the year 2030 would be the maximum emissions to occur during the permit term and have therefore been considered as the potential emissions for the purposes of evaluating this application. 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*

Noble Hill is subject to New Source Performance Standards (NSPS) found in 40 CFR 60, Subpart XXX, which includes standards of performance for MSW landfills that commenced construction, reconstruction, or modification after July 17, 2014, because it has a design capacity greater than  $2.5 \times 10^6$  cubic meters and  $2.5 \times 10^6$  megagrams and began construction after July 17, 2014. Tier II testing conducted in 2024 shows that Noble Hill's uncontrolled non-methane organic compounds (NMOC) emissions have not exceeded the 34 megagrams per year threshold, and the landfill is not required to install a gas collection and control system (GCCS). Noble Hill is required to continue submitting an NMOC report annually, and to continue performing Tier 2 testing every five years.

Noble Hill is not a major source for hazardous air pollutants (HAP) emissions. For this reason, and because the NMOC emission level is below 50 megagrams per year, the landfill is not subject to Subpart AAAA, National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills.

#### *X002: MSW Landfill Asbestos NESHAP*

The landfill has also accepted waste containing asbestos, making it subject to the NESHAP 40 CFR 61, Subpart M. 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: Facility-Wide Fugitive Dust Control*

The landfill is required to take reasonable measures to prevent fugitive dust that travels beyond the landfill property line. The MSOP outlines actions the site must take in different areas of the landfill to meet the dust control requirements. There is also a requirement to monitor visually on a weekly basis. The landfill will be required to maintain records of dust inspections and include information on monitoring of fugitive dust control measures in the semi-annual report to the Department.

### PSD

The potential emissions of all regulated pollutants 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

Noble Hill Landfill will maintain on-site records of the design capacity report (in which the design capacity was shown to have exceeded 2.5 million m<sup>3</sup> by volume and 2.5 million megagrams by mass), the current waste in place, and year to year waste acceptance rates and other records to show compliance with the NSPS 40 CFR 60, Subpart XXX.

Compliance Assurance Monitoring (CAM) is not applicable as Noble Hill is subject to NSPS standards that were promulgated after November 15, 1990. According to 40 CFR 64.2(b)(1)(i) on exemptions from CAM, 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.

#### Recordkeeping and Reporting Requirements

Noble Hill Landfill is required to keep records including, but not limited to, the current amount of solid waste in place, year-by-year waste acceptance rates, above required monitoring and testing of the GCCS for a minimum of 5 years. These records will be evaluated by the Department during the annual inspection. The facility will also be required to submit a deviation report on a semi-annual basis and an Annual Compliance Certification (ACC).

#### Recommendation

I recommend that the Noble Hill Landfill be issued the enclosed Title V Permit No. 307-0053 for a Municipal Solid Waste Landfill with a design capacity of greater than  $2.5 \times 10^6$  megagrams and  $2.5 \times 10^6$  cubic meters.

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John Robert Gill  
Chemical Branch  
Air Division  
July 18, 2025