**Commonwealth of Kentucky**
**Division for Air Quality**

# *STATEMENT OF BASIS / SUMMARY*

Title V, Operating
Permit: V-26-013

West Daviess County Landfill
7772 KY Route 815
Owensboro, KY 42301

May 28, 2026
Ryan Anderson, Reviewer

| | |
|---|---|
| SOURCE ID: | 21-059-00193 |
| AGENCY INTEREST: | 973 |
| ACTIVITY: | APE20230001 |

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## SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 4953, Refuse Systems (solid waste landfills)

Single Source Det. ☒ Yes ☐ No If Yes, Affiliated Source AI: 178066

Source-wide Limit ☐ Yes ☒ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Daviess
Nonattainment Area ☒ N/A ☐ $PM_{10}$ ☐ $PM_{2.5}$ ☐ CO ☐ $NO_X$ ☐ $SO_2$ ☐ Ozone ☐ Lead

PTE* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No
If yes, for what pollutant(s)?
☐ $PM_{10}$ ☐ $PM_{2.5}$ ☒ CO ☐ $NO_X$ ☐ $SO_2$ ☐ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☐ Yes ☒ No
If yes, for what pollutant(s)?
☐ $PM_{10}$ ☐ $PM_{2.5}$ ☐ CO ☐ $NO_X$ ☐ $SO_2$ ☐ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☐ Yes ☒ No
If yes, list which pollutant(s):

PTE* greater than 25 tpy for combined HAP ☐ Yes ☒ No

*PTE does not include self-imposed emission limitations.

Description of Facility:
The West Daviess County Landfill located in Daviess County, KY is a municipal solid waste landfill that commenced construction in 1968 and was modified in 1996. This landfill has a design capacity of 9,266,837 megagrams and a calculated emission rate of more than 50 megagrams per year of non-methane organic compounds (NMOC). The landfill installed a Gas Collection and Control System (GCCS) to comply with 40 CFR 60, Subpart WWW on April 13, 2006.

The landfill consists of Unit 1, which accepted waste from 1968 to 1987, Unit 2, which accepted waste from 1988 to 1994, Unit 3, which accepted waste from 1968 to 1994, and Unit 5, which accepted waste from 1996 to the present.

The landfill has the ability to send the landfill gas to an open flare or the associated renewable natural gas (RNG) facility Owensboro RNG, LLC (AI 178066). The RNG plant processes raw landfill gas from the GCCS owned and operated by West Daviess County Landfill through membrane separation and adsorption processes to refine the methane concentration and remove contaminants to achieve pipeline-grade specifications for natural gas. The final product is injected into an existing natural gas pipeline.

The source is required to obtain a Title V permit by 401 KAR 52:020, Section 1(4) and 40 CFR 60.31f(c). The source includes a landfill and associated equipment including a Gas Collection

and Control System (GCCS), flare, fuel (gasoline and diesel) tanks, haul roads, site construction, emergency generator, and leachate storage tanks.

The facility also has several listed trivial activities such as space heaters for human comfort maintenance activities and several small non-road engines related to maintenance activities (all less than 35 HP). The trivial activities at the facility are all included under items #3, #12, #13, and #14.

The source also includes a composting facility, C&D disposal area and a landfarm. The landfarm is included in the Solid Waste Permit sw03000052, sw03000004 (APE20170002). Pursuant to 401 KAR 45:100 Section 6(11), the permittee shall maintain compliance with the ambient air quality standard for odor, as set forth in 401 KAR 53:010.

In the absence of an approved state plan implementing 40 CFR Part 60, Subpart Cf, the landfill is subject to the federal plan under 40 CFR Part 62, Subpart OOO. Upon approval of Kentucky's state plan, the 40 CFR 60, Subpart Cf requirements implemented via 401 KAR 61:036 will apply in lieu of the federal plan.

## SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: V-26-013 Activities: APE20230001

Received: 5/1/2023 Application Complete Date(s): 6/28/2023

Permit Action: ☐ Initial ☒ Renewal ☐ Significant Rev ☐ Minor Rev ☐ Administrative

Construction/Modification Requested? ☐Yes ☒No NSR Applicable? ☐Yes ☒No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐Yes ☒No

**Description of Action:**
The West Daviess County Landfill submitted an application to renew the current Title V permit. With this renewal, the following changes have been made:

- Emission calculations for the landfill and flare (EP 001 and 004) were updated to use the current version of AP-42, Chapter 2.4 (May 2025), as well as worst-case site specific data for $H_2S$.
- Updated permit language to be consistent and clear.
- Updated the regulatory language for 40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart JJJJ to reflect revisions made to this regulation since the previous permit was issued.
- Added the requirements of 40 CFR 60, Subpart Cf and 40 CFR 63, Subpart AAAA, while removing the requirements of 40 CFR 60, Subpart WWW, which are no longer applicable. The requirements from 40 CFR 60, Subpart Cf that are predicated on the approval of the state plan are included in Section I of the permit. The rest of the requirements are included in Section B and co-cited with the corresponding requirements from 40 CFR 63, Subpart AAAA where appropriate.

| **V-26-013 Emission Summary** | | | |
|---|---|---|---|
| **Pollutant** | **2024 Actual (tpy)[3]** | **PTE V-26-013 (tpy)[2]** | **Combined Facility PTE (tpy)[1]** |
| CO | 1.92 | 95.57 | 162.05 |
| $NO_X$ | 0.09 | 21.09 | 54.33 |
| PT | 8.97 | 5.16 | 5.33 |
| $PM_{10}$ | 4.59 | 5.16 | 6.26 |
| $PM_{2.5}$ | 1.93 | 5.16 | 6.26 |
| $SO_2$ | 0.57 | 12.82 | 12.89 |
| VOC | 33.3 | 1.63 | 12.83 |
| Lead | 0 | 0 | 0.00001 |
| Greenhouse Gases (GHGs) | | | |
| Carbon Dioxide | 144,800 | 61,594 | 75,167 |
| Methane | 2,291 | 252 | 252 |
| Nitrous Oxide | 0.09 | 0.67 | 0.69 |
| $CO_2$ Equivalent ($CO_2e$) | 208,972 | 68,815 | 82,402 |
| Hazardous Air Pollutants (HAPs) | | | |
| Dichloromethane | -[4] | 0.94 | 0.94 |
| Formaldehyde | - | 0 | 4.96 |
| Hydrochloric Acid | 0.24 | 2.13 | 2.13 |

| V-26-013 Emission Summary | | | |
|---|---|---|---|
| **Pollutant** | **2024 Actual (tpy)[3]** | **PTE V-26-013 (tpy)[2]** | **Combined Facility PTE (tpy)[1]** |
| Toluene | 22.4 | 2.82 | 2.86 |
| Xylenes (Total) | 0.26 | 1.00 | 1.02 |
| Combined HAPs: | 22.9 | 9.91 | 16.20 |

[1]**Note:** The "combined facility PTE" includes both emissions from West Daviess County Landfill and Owensboro RNG. Because they are considered a "single source" their emissions must be counted together. The worst-case emissions for the combined facility PTE occur when the RNG facility does not operate and all landfill gas emissions are destroyed in the West Daviess County Landfill flare. Therefore, the flare and RNG plant at Owensboro RNG are not counted toward the combined facility PTE because the landfill can only generate a set quantity of gas.

[2]**Note:** This is the individual PTE for West Daviess County Landfill and does not include Owensboro RNG (A.I. 178066).

[3]**Note:** The actual reported emissions include emissions from fugitive sources not otherwise counted toward the Title V PTE.

[4]**Note:** Pollutant was not tracked in EIS for the 2024 inventory.

## SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

**Emission Unit 001 - Municipal Solid Waste (MSW) Landfill**

**Initial Construction and Modification Date:** 1968, modified in 1996

**Process Description:**
A MSW landfill that has accepted waste since November 8, 1987, commenced construction, reconstruction, or modification before July 17, 2014, having a design capacity equal to or greater than 2.5 million megagrams by mass or 2.5 million cubic meters by volume, and an NMOC emission rate (Calculated according to 40 CFR 63.1959) greater than 50 Mg/yr.

This landfill installed a Gas Collection and Control System (GCCS) on April 13, 2006. The landfill initially submitted a GCCS Plan for approval on May 10, 2002, after the landfill exceeded the 50 Mg/yr threshold, and became subject to the requirement to install and operate a GCCS according to 40 CFR 60, Subpart WWW. The system may send gas to EU004 or to the adjacent Owensboro RNG, LLC (AI 178066) facility. An updated GCCS plan was approved by the Division in the renewal process for V-18-019 (APE20170007), issued on November 3, 2018. No alternatives to the requirements of the NSPS were requested with the GCCS plan submittal.

The landfill consists of Unit 1, which accepted waste from 1968 to 1987, Unit 2, which accepted waste from 1988 to 1994, Unit 3, which accepted waste from 1968 to 1994, and Unit 5, which accepted waste from 1996 to the present.

Permitted Design Capacity: 9,266,837 Mg

**Applicable Regulation:**
**401 KAR 53:010**, *Ambient air quality standards.* This regulation contains the primary and secondary Ambient Air Quality Standards for sulfur oxides, particulate matter, carbon monoxide, ozone, nitrogen dioxide, lead, hydrogen sulfide, gaseous fluorides, total fluorides, and odors are specified in Appendix A of 401 KAR 53:010.

**401 KAR 61:036,** *Emission guidelines and compliance times for municipal solid waste (MSW) landfills,* applies to each MSW landfill that commenced construction, modification, or reconstruction on or before July 17, 2014. This regulation requires compliance with **40 CFR 60, Subpart Cf,** *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills.*

**401 KAR 63:002, Section 2(4)(hhh), 40 C.F.R. 63.1930 through 63.1990, Table 1 (Subpart AAAA)**, *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills,* applies to each municipal solid waste (MSW) landfill that has accepted waste since November 8, 1987 or has additional capacity for waste deposition and has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters ($m^3$) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to 40 CFR 63.1959.

**401 KAR 63:010**, *Fugitive emissions,* applies to each affected facility which emits or could emit fugitive emissions not elsewhere subject to an opacity standard within 401 KAR Chapters 50 through 68.

**401 KAR 63:015**, *Flares,* applies to each affected facility which means flares as defined in 401 KAR 63:015, Section 2.

**40 CFR 60.18,** *General control device and work practice requirements* applies to control devices (flare) used to comply with applicable subparts of 40 CFR part 60.

**Emission Unit 001 - Municipal Solid Waste (MSW) Landfill**

**40 CFR 61, Subpart M**, *National Emission Standard for Asbestos,* applies to each active asbestos waste disposal site.

**40 CFR 63.11,** *Control device and work practice requirements* applies to control devices (flare) used to comply with applicable subparts of 40 CFR part 63.

**Comments:**
Emission factors from AP 42 Chapter 2.4 (May 2025) and site-specific data, including worst-case site specific $H_2S$ concentration of 140 ppm. $H_2S$ monitoring for the landfill gas collection system has been included in the permit and is used for accurate quantification of fugitive $H_2S$ emissions and $SO_2$ emissions produced by the flare.

Monitoring of liquid levels for gas wells is included in the permit to ensure adequate gas collection, which is dependent on the availability of well perforations. Excessive liquid in wells can also inhibit proper methane production and degrade monitored well parameters causing excessive oxygen intrusion and high temperatures.

The permit also includes alternate operating scenarios for GCCS Removal, Requests for Higher Operating Values (HOV), and Requests for Decommissioning of Gas Collectors.

A, revised gas collection and control plan was submitted and approved by the Division for Air Quality (APE20170007) with renewal permit V-18-019. No alternatives to the requirements of the NSPS were requested with this submittal. The initial gas collection and control plan was submitted to the Kentucky Division of Solid Waste with the solid waste renewal application (APE20020001).

If West Daviess County Landfill receives (From the Division of Waste Management) an increase in the permitted volume design capacity of the landfill by either lateral or vertical expansion based on its permitted design capacity as of July 17, 2014, the landfill must submit an application to the Division incorporating into the permit the requirements of 40 CFR 60, Subpart XXX with a specified date that construction on the lateral or vertical expansion is expected to occur. Pursuant to 40 CFR 60, Subpart XXX, modification does not occur until the permittee commences construction on the lateral or vertical expansion.

| Emission Unit 004 - Landfill Flare | | | | |
|---|---|---|---|---|
| **Pollutant** | **Emission Limit or Standard** | **Regulatory Basis for Emission Limit or Standard** | **Emission Factor Used and Basis** | **Compliance Method** |
| Opacity | < 20% | 401 KAR 63:015, Section 3 | - | Weekly qualitative observations and recordkeeping. |

**Initial Construction and/or Modification Date:** 2005

**Process Description:**
Open landfill flare which combusts landfill gas.
Maximum Capacity: 2100 scfm

**Applicable Regulation:**
**401 KAR 61:036,** *Emission guidelines and compliance times for municipal solid waste (MSW) landfills,* applies to each MSW landfill that commenced construction, modification, or reconstruction on or before July 17, 2014. This regulation requires compliance with **40 CFR 60, Subpart Cf,** *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills.*

**401 KAR 63:002, Section 2(4)(hhh), 40 C.F.R. 63.1930 through 63.1990, Table 1 (Subpart AAAA)**, *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills*, applies to each municipal solid waste (MSW) landfill that has accepted waste since November 8, 1987 or has additional capacity for waste deposition and has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters ($m^3$) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to 40 CFR 63.1959.

**401 KAR 63:015**, *Flares*, applies to each affected facility which means flares as defined in 401 KAR 63:015, Section 2.

**40 CFR 60.18,** *Control device and work practice requirements general control device and work practice requirements* applies to control devices (flare) used to comply with applicable subparts of 40 CFR Part 60.

**40 CFR 63.11,** *Control device and work practice requirements control device and work practice requirements* applies to control devices (flare) used to comply with applicable subparts of 40 CFR part 63.

**Comments:**
This flare is a control device installed to meet the requirements of 40 CFR 60.33f(c)(1) and 40 CFR 63.1959(b)(2)(iii)(A). Emission factors from AP-42 Chapter 2.4, Table 2.4-1, AP-42 Chapter 13.5, Table 13.5-1, and worst-case site specific $H_2S$ concentration of 140 ppm. Control efficiency for Non Methane Organic Compounds (NMOC) is 98%.

**Emission Unit 002 – Paved and Unpaved Haul Roads**

**Initial Construction Date:** 1968

**Process Description:**
Paved haul roads and unpaved haul roads.
Maximum Capacity: 34,611 VMT paved & 97,937 VMT unpaved
Control Devices: Water trucks

**Applicable Regulation:**
**401 KAR 63:010**, *Fugitive emissions*, applies to each affected facility which emits or could emit fugitive emissions not elsewhere subject to an opacity standard within 401 KAR Chapters 50 through 68.

**Comments:**
Emission factors from AP-42 Chapter 13.2.1 and AP-42 Chapter 13.2.2. Potential emissions are calculated using the "maximum capacity" listed, however, roads at landfills change often, and the maximum capacity does not reflect the usage of the roads at any given time. The maximum capacity represents the maximum that the PTE was calculated based on with, and a permit revision application should be submitted if this maximum is not adequate to estimate the potential emissions of the activity in the future.

**Emission Unit 005 - Site Construction**

**Initial Construction Date:** 1968

**Process Description:**
Material handling including equipment operations of bulldozer(s), compactor(s), excavator(s) and loader(s), soil material and soil covering operations.
Maximum Capacity: 31,886 tons/yr cover soil usage, 17,327 hours/yr equipment usage.
Control Devices: None

**Applicable Regulation:**
**401 KAR 63:010**, *Fugitive emissions*, applies to each affected facility which emits or could emit fugitive emissions not elsewhere subject to an opacity standard within 401 KAR Chapters 50 through 68.

**Comments:**
Emission factors from AP-42 Chapter 13.2.3 and AP-42 Chapter 13.2.4. Potential emissions are calculated using the "maximum capacity" listed, however, roads at landfills change often, and the maximum capacity does not reflect the usage of the roads at any given time. The maximum capacity represents the maximum that the PTE was calculated based on. A permit revision application should be submitted if this maximum is not adequate to estimate the potential emissions of the activity in the future.

**Emission Unit 007 – Gasoline Storage Tank & Dispensing**

**Initial Construction Date:** 2008

**Process Description:** Storage of gasoline with a throughput of less than 5,000 gallons/yr.
Storage Capacity: 1100 gallon
Maximum Throughput: 5,000 gal/yr dispensed

**Applicable Regulation:**
**401 KAR 63:002, Section 2(4)(ddddd)**, **40 C.F.R. 63.11110 through 63.11132, Tables 1 through 3 (Subpart CCCCCC),** *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities,* applies to loading of gasoline storage tanks at gasoline dispensing facilities (GDF).

**Comments:**
Emission factors from Tanks 4.09D.

| Emission Unit 006 - Emergency Generator | | | | |
|---|---|---|---|---|
| **Pollutant** | **Emission Limit or Standard** | **Regulatory Basis for Emission Limit or Standard** | **Emission Factor Used and Basis** | **Compliance Method** |
| NMHC* + NOx | 10 g/HP-hr | 40 CFR 60.4233(d) referencing 40 CFR 60, Subpart JJJJ, Table 1 | 338.52 lb/1000 gal<br><br>AP-42 Chapter 3.2-3 | Based on certified engines or maintenance of engine in a manner consistent with good air pollution control practice for minimizing emissions and an initial performance test |
| CO | 387 g/HP-hr | 40 CFR 60.4233(d) referencing 40 CFR 60, Subpart JJJJ, Table 1 | 201.11 lb/1000 gal<br><br>AP-42 Chapter 3.2-3 | Based on certified engines or maintenance of engine in a manner consistent with good air pollution control practice for minimizing emissions and an initial performance test |

*Non-Methane Hydrocarbons (NMHC) are not currently calculated and tracked as separate pollutants.

**Initial Construction Date:** 2009

**Process Description:**
Propane fueled emergency generator for emergency electrical power.
Model: Generac Model RG027
Maximum Capacity: 60 HP
Primary Fuel: Propane
Controls: None

**Applicable Regulations:**
**401 KAR 63:002, Section 2(4)(eeee)**, **40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ)**, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is applicable, however, pursuant to 40 CFR 63.6590(c), a new stationary RICE located at area source may comply with requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ. No further requirements apply to this engine under 40 CFR 63.

**401 KAR 60:005, Section 2(2)(eeee)**, **40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (Subpart JJJJ**), *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*, applies to stationary spark ignition (SI) internal combustion engines (ICE) that commence construction after June 12, 2006.

**Comments:**
Emissions calculated using 500 hours/yr to account for emergency operation. Emission factors from AP-42 Chapter 3.2 Table 3.2-3 and 40 CFR 98 Tables C-1 and C-2.

## SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

**Testing Requirements\Results**

| Emission Unit(s) | Control Device | Parameter | Regulatory Basis | Frequency | Test Method | Permit Limit | Test Result | Thruput and Operating Parameter(s) Established During Test | Activity Graybar | Date of last Compliance Testing |
|---|---|---|---|---|---|---|---|---|---|---|
| 001 | None | $H_2S$ ppm | 401 KAR 50:045, Section 1 | Initial & Annual | ASTM D5504 | N/A | 36.67 ppm | 368 scfm | CMN20190009[2] | 3/12/2019 |
| 001 | None | $H_2S$ ppm | 401 KAR 50:045, Section 1 | Annual | ASTM D5504 | N/A | 2.60 ppm | None provided | CMN20200001 | 6/23/2021 |
| 001 | None | $H_2S$ ppm | 401 KAR 50:045, Section 1 | Annual | ASTM D5504 | N/A | 42.67 ppm | None provided | CMN20230010 | 11/27/2023 |
| 001 | None | $H_2S$ ppm | 401 KAR 50:045, Section 1 | Annual | ASTM D5504 | N/A | 30.67 ppm[1] | 610 scfm[1] | CMN20240006 | 12/3/2024 |
| 001 | None | $H_2S$ ppm | 401 KAR 50:045, Section 1 | Annual | ASTM D5504 | N/A | 140 ppm | 523 scfm | CMN20250005 | 12/2/2025 |
| 001 | None | $H_2S$ ppm | 401 KAR 50:045, Section 1 | Annual | U.S. EPA Method 15/16; ASTM D4084; ASTM D5504; or Approved Alt. | N/A | TBD | TBD | TBD | 2026 |

| Emission Unit(s) | Control Device | Parameter | Regulatory Basis | Frequency | Test Method | Permit Limit | Test Result | Thruput and Operating Parameter(s) Established During Test | Activity Graybar | Date of last Compliance Testing |
|---|---|---|---|---|---|---|---|---|---|---|
| 004 | Flare | Net heating value | 40 CFR 60.18(f)(3) | Initial | US EPA Method 18 | > 7.45 MJ/scm | 18.18 MJ/scm | 267 scfm | CMN20070001 | 1/31/2007 |
| 004 | Flare | Actual Exit velocity | 40 CFR 60.18(f)(4) | Initial | US EPA Method 1 & 2 | < 37.2 m/s | 2.60 m/s | 267 scfm | CMN20070001 | 1/31/2007 |

**Footnotes:** West Daviess County Landfill calculated NMOC of greater than 50 Mg using the Tier I method and opted to install a GCCS rather than perform Tier II testing to determine a site specific concentration of NMOC.

[1]The test report for this $H_2S$ sample was not submitted to the Division within 45 days.

[2] The test protocol for this $H_2S$ sample was submitted to the Division after the test was completed.

Performance testing must be conducted in accordance with 401 KAR 50:045. The permittee must submit a test protocol to the Source Sampling Section at least 60 days prior to testing. Retesting may be required if results are invalid, if process or control device changes occur, or if compliance cannot be demonstrated. A test report must be submitted to the Source Sampling Section no later than 45 days after the completion of fieldwork.

## SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

**Table A - Group Requirements:**

| Emission and Operating Limit | Regulation | Emission Unit |
|---|---|---|
| N/A | N/A | N/A |

**Table B - Summary of Applicable Regulations:**

| Applicable Regulations | Emission Unit |
|---|---|
| **401 KAR 53:010,** *Ambient air quality standards* | Site-wide |
| **401 KAR 60:005, Section 2(2)(eeee), 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (Subpart JJJJ),** *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* | EU 006 |
| **401 KAR 61:036,** *Emission guidelines and compliance times for municipal solid waste (MSW) landfills,* requiring compliance with **40 CFR 60, Subpart Cf,** *Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills* | EU 001, 004 |
| **401 KAR 63:002, Section 2(4)(hhh), 40 C.F.R. 63.1930 through 63.1990, Table 1 (Subpart AAAA),** *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills* | EU 001, 004 |
| **401 KAR 63:002, Section 2(4)(eeee), 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ),** *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* | EU 006 |
| **401 KAR 63:002, Section 2(4)(ddddd), 40 C.F.R. 63.11110 through 63.11132, Tables 1 through 3 (Subpart CCCCCC),** *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities* | EU 007 |
| **401 KAR 63:010,** *Fugitive emissions* | EU 001, 002, & 005 |
| **401 KAR 63:015,** *Flares* | EU 004 |
| **40 CFR 60.18,** *General control device and work practice requirements* | EU 004 |
| **40 CFR 61, Subpart M,** *National Emission Standard for Asbestos* | EU 001 |
| **40 CFR 63.11,** *General control device and work practice requirements* | EU 004 |

**Table C - Summary of Precluded Regulations:**

| Precluded Regulations | Emission Unit |
|---|---|
| N/A | N/A |

**Table D - Summary of Non Applicable Regulations:**

| Non Applicable Regulations | Emission Unit |
|---|---|
| N/A | N/A |

**Air Toxic Analysis**

N/A

## SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

**Single Source Determination**

West Daviess County Landfill, Source ID #: 21-059-00193 (A.I. #973), and the adjacent Owensboro RNG, LLC, Source ID #: 21-059-00269 (A.I. #178066), are considered by the Cabinet and the United States Environmental Protection Agency to be a "single source" in determining applicability under 401 KAR 51:017, Prevention of significant deterioration of air quality (PSD) and 401 KAR 52:020, Title V permits. Each source is subject to 401 KAR 52:020 and will be issued individual Title V operating permits. Pursuant to the respective Title V permits, each permittee is responsible and liable for their own violations unless there is a joint cause for the violations.

## SECTION 5 – COMPLIANCE ASSURANCE MONITORING

**40 CFR 64**, *Compliance assurance monitoring* (CAM) applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 CFR 64.2(b)(1);

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

| **Emission Unit** | **Criteria 1 (Y/N)** | **Criteria 2 (Y/N)** | **Criteria 3 (Y/N)** | **Does CAM apply? If Y for criteria 1, 2, AND 3, then Yes, Otherwise, No.** |
|---|---|---|---|---|
| 001 | N | N | N | No |
| 002 | N | N | N | No |
| 004 | N | N | N | No |
| 005 | N | N | N | No |
| 006 | N | N | N | No |
| 007 | N | N | N | No |

***** If Yes, CAM applies for any of the emission units above, then see further clarification for each listed emission unit in **Section 3**.

## SECTION 6 – PERMITTING HISTORY

| Permit | Permit Type | Activity # | Complete Date | Issuance Date | Summary of Action | PSD/Syn Minor |
|---|---|---|---|---|---|---|
| G-02-001 | Initial | APE20050002 | 1997 | 7/11/2002 | Initial Issuance of Title V General Permit | N/A |
| G-07-001 | Renewal | APE20060004 | 3/11/2007 | 10/16/2007 | Renewal of Title V General Permit | N/A |
| G-12-001 | Renewal | APE20120002 | 10/3/2012 | 2/19/2013 | Renewal of Title V General Permit | N/A |
| V-18-019 | Renewal | APE20170007 | 2/9/2018 | 11/3/2018 | Change from General permit to individual permit | N/A |

## SECTION 7 – PERMIT APPLICATION HISTORY

N/A

## APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS – Ambient Air Quality Standards
BACT – Best Available Control Technology
Btu – British thermal unit
CAM – Compliance Assurance Monitoring
CFM – Cubic Feet per Minute
CO – Carbon Monoxide
Division – Kentucky Division for Air Quality
ESP – Electrostatic Precipitator
GHG – Greenhouse Gas
HAP – Hazardous Air Pollutant
HF – Hydrogen Fluoride (Gaseous)
HOV – Higher Operating Value
$H_2S$ – Hydrogen Sulfide
MSDS – Material Safety Data Sheets
mmHg – Millimeter of mercury column height
NAAQS – National Ambient Air Quality Standards
NESHAP – National Emissions Standards for Hazardous Air Pollutants
NMOC – Nonmethane Organic Compounds
$NO_x$ – Nitrogen Oxides
NSR – New Source Review
PM – Particulate Matter
$PM_{10}$ – Particulate Matter equal to or smaller than 10 micrometers
$PM_{2.5}$ – Particulate Matter equal to or smaller than 2.5 micrometers
PSD – Prevention of Significant Deterioration
PTE – Potential to Emit
$SO_2$ – Sulfur Dioxide
TF – Total Fluoride (Particulate & Gaseous)
VMT – Vehicle Miles Traveled
VOC – Volatile Organic Compound

## APPENDIX B – GCCS PLAN HISTORY AND REQUESTED ALTERNATIVES

This landfill installed a Gas Collection and Control System (GCCS) on April 13, 2006, and initially submitted a GCCS plan for approval on May 10, 2002, after the landfill exceeded the 50 Mg/yr threshold, and became subject to the requirement to install and operate a GCCS according to 40 CFR 60, Subpart WWW. The initial gas collection and control plan was submitted to the Division of Solid Waste with the solid waste renewal application (APE20020001).

A revised GCCS plan was approved by the Division in the renewal process for V-18-019 (APE20170007), issued on November 3, 2018. No alternatives to the requirements of the NSPS were requested with the GCCS plan submittal.