

TITLE V PERMIT STATEMENT

Facility Name:	Repurpose, LLC dba ECM Landfill
City:	Obion
County:	Obion

Date Application Received:	October 4, 2023
Date Application Deemed Complete:	October 4, 2023

Emission Source Reference No.:	66-0185
Permit No.:	581837

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to Repurpose, LLC dba ECM Landfill and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD	Prevention of Significant Deterioration
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
MACT	Maximum Achievable Control Technology
NSR	New Source Review
GHGs	Greenhouse Gases
CAM	Compliance Assurance Monitoring
NMOC	Non-Methane Organic Compound

I. Identification Information

A. Source Description

This is a municipal solid waste (MSW) landfill located in Obion, Tennessee, Obion County. The facility is a Class 1 landfill subject to 40 CFR Part 60 Subpart XXX (Standards for Municipal Solid Waste Landfills). However, the landfill is currently not subject to the gas collection and control system (GCCS) requirements of 40 CFR Part 60 Subpart XXX (New Source Performance Standards for Municipal Solid Waste Landfills), because NMOC (nonmethane organic compounds) emissions are less than 34 megagrams per year. The landfill is not subject to 40 CFR Part 63 Subpart AAAA (National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills) because NMOC emissions are less than 50 megagrams per year. A gas collection and control system (GCCS) is not present.

B. Facility Classification

1. Attainment or Non-Attainment Area Location

Area is designated as an attainment area for all criteria pollutants.

2. Company is located in a Class II area (this means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21(e) for a complete definition)...

C. Regulatory Status

1. PSD/NSR

This facility is not a major source under PSD.

2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	Yes		Yes
PM ₁₀	Yes		Yes
SO ₂	Yes		Yes
VOC	Yes		Yes
NO _x	Yes		Yes
CO	Yes		Yes
Individual HAP	Yes		Yes
Total HAPs	Yes		Yes
CO ₂ (e)	Yes		Yes

MSW landfills are required to have T5 permits after reaching 2.5 million mega-grams (or 2.5 million cubic meters) in size. 40CFR60.752

3. MACT Standards

This facility is not a major source for HAPs. The MACT Standard for municipal solid waste landfills, 40 CFR 63, subpart AAAA, does not apply to this facility, because the NMOC emissions are less than 34 megagrams per year.

4. Program Applicability

Are the following programs applicable to the facility?

PSD: no

NESHAP: yes – 40 CFR 61 Subpart M (National Emission Standards for Asbestos)

NSPS: yes – 40 CFR 60 Subpart XXX

II. Compliance Information

Is the facility currently in compliance with all applicable requirements? yes

III. Other Requirements

A. Emissions Trading

The facility is not involved in an emission trading program.

B. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

Not Applicable

IV. Public Participation Procedures

Notification of this draft permit **was emailed** to the following environmental agencies on February 26, 2019:

1. EPA
2. Arkansas Department of Pollution Control and Ecology, Air Division
3. Kentucky Department for Environmental Protection, Air Pollution Control
4. Missouri Division of Environmental Quality, Air Pollution Control Program
5. Illinois Environmental Protection Agency, Division of Air Pollution Control

V. Permit History

A. Title V Operating Permit No. 573470 represents the initial T5 permit for this source. The following changes have occurred since issuance of Title V permit # 573470:

On May 23, 2019, the permit was administratively amended to correct typos in Conditions E2(c) and E3-6. In addition, semiannual reporting requirements were removed from the permit in Condition E2(a) and E2(c). In Condition E2(a), the 12-month period was changed from “July 1, 2018, through June 30, 2019”, to “July 1, 2019, through June 30, 2020”. The delayed record keeping requirement will allow time for the Permittee to develop their record keeping program.

On August 6, 2019, the permit was administratively amended to correct the size of the Leachate Tank in Condition E3-3 and update the wording of A16. The permitted size of the Leachate Tank was changed from the incorrect 650,000 gallons

Tier 2 Test and NMOC emissions rate report dated October 11, 2022 indicated that NMOC emissions were 1.80 Mg/yr with an NMOC overall concentration of 63.86 ppmv. Consequently, because NMOC emissions are less than 34.0 mg/yr, a gas collection and control system (GCCS) is not required.

B. Title V Operating Permit No. 581837 represents the first renewal of initial Title V Permit No. 573470.

On January 31, 2024, the permittee (Stanley Dean) was contacted to verify construction of their new cell (1C). See document in Smoglog dated May 31, 2016. The permittee said the construction was completed in year 2021, and they began filling it with waste in 2022. This new cell subjects the facility to 40 CFR 60 Subpart XXX instead of 40 CFR 62 Subpart OOO. It was also reported that cells 1D and 1E were constructed.

A letter dated January 2, 2025, confirmed the Responsible Official and Technical Contact for the permitted facility and designated Kristi Morrow as the new billing contact, replacing Jessica Butler.

VI. Comments on Draft Permit

General Information

Date of Public Notice	TBD
Date of Public Hearing:	TBD

Summary of comments

Commenter	Comments	Response
EPA	TBD	TBD
Permittee	Change the Facility Name	Cannot Change Name without Name Registration
EFO	Update the Responsible Official	Responsible Official was Confirmed

VII. Summary of Potential Emissions by Source Number or Source Type

The following potential emissions are not included in the permit. These emissions are used for reference only.

Source	PM (TPY)	SO ₂ (TPY)	CO (TPY)	VOC (TPY)	NO _x (TPY)	HAP (TPY)	GHG (TPY/1000)
66-0185-01							
Fugitive ²				0.45		2.08	
Fugitive ³							
66-0185-00 ¹				0.45		2.08	

¹ Source 00 represents facility wide emissions. HAP emissions are not included in the VOC emissions.

² Fugitive emissions emerging from landfill subsurface.

³ Fugitive dust due to vehicle activity at the landfill.

VIII. Summary of Emissions for Fee Purposes

The Division does not set allowable emission for landfills, but landfills do have to pay fees pursuant to 1200-03-26-.02(2)(d)3. In addition, fees are not assessed for fugitive PM emissions unless the Division sets fugitive limits in the permit. Since fugitive PM emissions are not set in the permit, fugitive PM emissions are not in the permit Fee Emissions Summary Table (Section E1: Fee Emissions Summary).

Source	PM (TPY)	SO ₂ (TPY)	CO (TPY)	VOC (TPY)	NO _x (TPY)	HAP (TPY)	GHG (TPY/1000)
66-0185-01*							
Fugitive ²				0.45		2.08	
Fugitive ³							
66-0185-00 ¹				0.45		2.08	

¹ Source 00 represents facility wide emissions. HAP emissions are not included in the VOC emissions.

* The permit contains allowable emission limitations only for fee purposes (Section E1: Fee Emissions Summary). The Division does not set allowable emission limits in permits for landfills. However, the Permittee must pay fees pursuant to 1200-03-26-.02(2)(d)3. Emission fees are assessed for fugitive emissions, but are not assessed for fugitive PM emissions. Because the Division does not set fugitive PM limit in landfill permits, the Permittee is not liable for payment of fugitive PM emissions. Fugitive PM emissions are not in E1 of the permit or in the Air Pollution Control Database, Smoglog Table of Emissions. Also, emission fees are not assessed for CO and Green House Gas (GHG) emissions, fugitive or otherwise.