

MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

Permitting and Compliance Division
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Montana Waste Systems
High Plains Sanitary Landfill and Recycling Center
Section 35, Township 22 North, Range 4 East, Cascade County
P.O. Box 2645, Great Falls, Montana 59403

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 Preconstruction Permitting		X	
New Source Performance Standards (NSPS)	X		40 CFR 60, Subpart WWW
National Emission Standards for Hazardous Air Pollutants (NESHAPS)	X		40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR)		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
Compliance Assurance Monitoring (CAM)		X	
State Implementation Plan (SIP)	X		General SIP Conditions

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SECTION I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the U.S. Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the original application submitted by Montana Waste Systems High Plains Sanitary Landfill and Recycling Center (High Plains) on February 13, 2004, and an additional submittal on March 1, 2004.

B. Facility Location

This facility is located in Section 35, Township 22 North, Range 4 East in Cascade County, Montana. Cascade County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants except for CO. The landfill is located approximately nine miles north of Great Falls, Montana, about one mile east of US Route 87.

C. Facility Background Information

Permit History

Permit #OP2981-00 established the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the EPA and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the original operating permit application submitted by Waste Management of Montana, Inc. for the High Plains Sanitary and Recycling Center and received by the Department of Environmental Quality (Department) on March 13, 1997.

On February 7, 2001, the Department received a request for the change of ownership of Permit #OP2981-00 from Waste Management of Great Falls and the High Plains Sanitary Landfill to Montana Waste Systems and the High Plains Sanitary Landfill. Permit **#OP2981-01** replaced Permit # OP2981-00.

D. Current Permit Action

The current permit action is a renewal of High Plain's Title V Operating Permit #OP2981-02 for the Great Falls Landfill. High Plain's Operating Permit #OP2831-01 was applicable for five years and expired on August 16, 2004. High Plains applied for a renewal of their Title V Operating Permit on February 13, 2004. Operating Permit **#OP2981-02** replaces Operating Permit #OP2981-01.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 105, MCA, the Department has conducted a private property taking and damaging assessment and has determined there are no taking or damaging implications. The checklist was completed on April 20, 2005.

F. Compliance Designation

The facility was last inspected on July 14, 2004, for air quality purposes. All material reviewed in indicated that the facility is in compliance with all the applicable requirements. All source tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

As its primary service, the High Plains Sanitary Landfill and Recycling Center receives and landfills municipal solid waste (MSW). The facility is permitted under Montana Solid Waste License #225. In addition to MSW, the facility is allowed to receive and landfill asbestos, and to receive and treat petroleum-contaminated soils. The site opened in 1980. The facility has landfilled an average of approximately 86,000 tons per year of municipal solid waste. In 1996, the site landfilled approximately 400 tons of asbestos. To date, no petroleum-contaminated soils have been received or treated at the site.

The Standard Industrial Classification (SIC) for this facility is "Municipal Solid Waste Landfill" which has a SIC Code of 4953.

B. Emission Units and Pollution Control Device Identification

Waste Management of Montana, Inc. operates the High Plains municipal solid waste landfill in Great Falls, Montana. The emitting units are the landfill itself, which is subject to 40 CFR 60 Subpart WWW, and the fugitive dust from vehicle traffic.

C. Categorically Insignificant Sources/Activities

The Administrative Rules of Montana (ARM) 17.8.1201(22)(a) defines an insignificant emissions unit as one that emits less than 5 tons per year of any regulated pollutant, has the potential to emit less than 500 pounds per year of lead or any hazardous air pollutant, and is not regulated by an applicable requirement other than a generally applicable requirement. The following are the insignificant emitting unit located at the facility.

IEU1	4,000 gallon diesel fuel tank
IEU2	Wire feed welder

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

The landfill is subject to 40 CFR 60, Subpart WWW requirements and the 40 CFR 61, Subpart M.

B. Monitoring Requirements

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements are contained in operating permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor for all emission units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions.

When compliance with the underlying applicable requirement for an insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo (**i.e., no monitoring**) will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emission units.

The permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by the permittee to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards

C. Test Methods and Procedures

The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct compliance testing to confirm its compliance status.

D. Recordkeeping Requirements

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record.

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, the permittee is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any

deviation, and the corrective action taken as a result of any deviation.

F. Public Notice

In accordance with ARM 17.8.132, a public notice was published in the *Great Falls Tribune* newspaper on or before May 4, 2005. The Department provided a 30-day public comment period on the draft operating permit from May 4, 2005, to June 6, 2005. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response
No Comments		

G. Draft Permit Comments

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
No Comments		

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response
No Comments		

SECTION IV. NON-APPLICABLE REQUIREMENTS ANALYSIS

Section IV of the operating permit "Non-applicable Requirements" contains the requirements that the Department determined were non-applicable. High Plains did not identify any non-applicable requirements in the permit application.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

As of the issuance date of draft Operating Permit #OP2981-02, no MACT Standards have been promulgated that will affect this facility. However, the Department is aware of a possible MACT Standard that may be promulgated that will affect this facility.

B. NESHAP Standards

As of the issuance date of draft Operating Permit #OP2981-02, the Department is unaware of any future NESHAP Standards that may be promulgated that will affect this facility. However the facility is currently subject to 40 CFR Subpart M, National Emission Standard for Asbestos.

C. NSPS Standards

As of the issuance date of draft Operating Permit #OP2981-02, the Department is unaware of any future NSPS Standards that may be promulgated that will affect this facility. The facility is currently subject to 40 CFR 60, Subpart WWW.

D. Risk Management Plan

As of the issuance date of draft Operating Permit #OP2981-02, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.