



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

MAR 19 2020

Brad Zimmerman
Environmental Manager
Courtney Ridge Landfill, LLC
2001 N MO Hwy 291
Sugar Creek, MO 64508

RE: New Source Review Temporary Permit Request - Project Number: 2020-03-031

Installation ID Number: 095-0267

Expiration Date: July 31, 2020

Temporary Permit Number: **032020-005**

Dear Brad Zimmerman:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request to temporarily install a 3,000 SCFM flare skid to provide vacuum and emission control to the Gas Collection and Control System (GCCS) at Courtney Ridge Landfill, LLC, located in Sugar Creek, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation at this location in accordance with Missouri State Rule 10 CSR 10-6.060(3).

The Courtney Ridge Landfill utilizes two 2,000 candlestick flares to control landfill gas collected with the landfill's GCCS. These flares are permitted under Construction Permit 012011-010 to provide the Courtney Ridge Landfill 4,000 SCFM of flare capacity. The Courtney Ridge Landfill plans to perform maintenance on the blower system for these two flares (EP09 and EP11) which is planned for April 2020. Due to operational and regulatory requirements, the Courtney Ridge Landfill needs to temporarily install a 3,000 SCFM flare skid to provide vacuum and emission control to the GCCS while performing the blower replacement. The GCCS averaged less than 2,500 SCFM in calendar year 2019, therefore the 3,000 SCFM temporary flare will provide more than adequate capacity during the period that the maintenance is performed. The time that it will take to complete this maintenance task is approximately a week.

An increase in potential to emit is not expected since the maximum hourly design rate of the temporary flare is less than the existing permitted flares. The landfill gas generation rates predicted by the Landfill Gas Emission Model (LandGem) v3.02 used in New Source Review project 2019-08-041 are less than the 3,000 SCFM MHDR of the temporary flare for the next two years. The modeling performed for permit 012011-010 showed impact levels significantly

Brad Zimmerman
Page Two

below the NAAQS limits and with the smaller MHDR of this temporary flare a significant increase of the impact levels is not expected.

Courtney Ridge Landfill, LLC shall include CO emissions from this temporary flare in the monthly CO emission tracking conducted in accordance with Special Condition 2 of permit 012011-010.

This temporary flare must be operated in accordance with *New Source Performance Regulations*, 10 CSR 10-6.075, *New Source Performance Standards for Municipal Solid Waste Landfills*, 40 CFR Part 60, Subpart WWW and *Maximum Achievable Control Technology Regulations*, 10 CSR 10-6.075, *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills*, 40 CFR Part 63, Subpart AAAA.

You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.045 *Open Burning Requirements*, 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.165 *Restriction of Emission of Odors*, and 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*.

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please do not hesitate to contact Jared Rhodes at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 75 1-4817. Thank you for your time and attention to this matter.

Sincerely,
AIR POLLUTION CONTROL PROGRAM

 Kendall B. Halverson

Darcy A. Bybee
Director

DAB:jara

c: PAMS File: 2020-03-031
Kansas City Regional Office