

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 24.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Scott County Landfill, located at 11555 110th Avenue, Davenport, Iowa 52804 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Bryce Stalcup.
2. Scott County Landfill is a landfill. This facility consists of 17 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	6.20
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	25.69
Particulate Matter	PM	93.88
Sulfur Dioxide	SO ₂	1.51
Nitrogen Oxides	NO _x	18.47
Volatile Organic Compounds	VOC	13.96
Carbon Monoxide	CO	105.17
Lead	Lead	0
Hazardous Air Pollutants ⁽¹⁾	HAP	3.85

⁽¹⁾ May include the following: See application.

3. Scott County Landfill submitted a Title V Operating Permit renewal application on June 25, 2024. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.
4. DNR has complied with the procedures set forth in 567 IAC 24.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from February 27, 2025 through March 29, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Zane Peters
Iowa Department of Natural Resources - Air Quality Bureau
6200 Park Ave
Ste #200
Des Moines, Iowa 50321
Phone: (515) 808-0458
E-mail: zane.peters@dnr.iowa.gov

DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 21-33, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 21-33.
4. DNR is required to comply with 567 IAC Chapter 24 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Title V Application Review Notes

Applicant:	Scott County Landfill
SIC Code:	4953
City:	Davenport
County:	Scott
EIQ#:	92-6872
Facility#:	82-01-121
Permit #:	02-TV-003R4
Reviewer:	Zane Peters
Date:	10/25/2024

Facility Identification

Facility Name:	Scott County Landfill
Facility Location:	11555 110th Avenue, Davenport, Iowa
Responsible Official:	Bryce Stalcup
Phone:	563-381-1300

Background:

Scott County Landfill located at 11555 110th Avenue, Davenport, Iowa has applied to renew their Part 70 Title V Operating Permit. Scott County Landfill is made up of two portions: a closed landfill and an active landfill. The closed landfill began accepting waste in 1977 and was closed in 1997. The active portion of the landfill was developed and began accepting waste in 1996. The total landfill capacity is 9,172,195 megagrams as defined by the current DNR construction permits.

The facility currently consists of four significant emission units. Pursuant to 567 IAC 24.101(2) any non-major source that is required to obtain a Title V operating permit solely because of an NSPS requirement is required to obtain a Title V permit only for the emission unit(s) and related equipment causing the source to be subject to the Title V program. There are other emission units at this facility that are not included in the Title V operating permit.

Solid Waste Permit Requirements

The permittee is subject to all requirements of the Solid Waste Permits issued by the Department of Natural Resources Land Quality Bureau: 82-SDP-3-77C for closed sections and 82-SDP-09-92P for operational sections.

Title V Applicability

Pollutant	Major for Title V?
PM ₁₀	<input type="checkbox"/>
SO ₂	<input type="checkbox"/>
NO _x	<input type="checkbox"/>
VOC	<input type="checkbox"/>
CO	<input checked="" type="checkbox"/>
Lead	<input type="checkbox"/>
Individual HAP	<input type="checkbox"/>
Total HAPs	<input type="checkbox"/>

The Scott County landfill is a major source based on CO emission and is also required to obtain a Title V Operating Permit because it is subject to 40 CFR Part 60 Subpart XXX, *New Source Performance Standards for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014* and is subject to 40 CFR Part 63 Subpart AAAA, *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills*.

Major source determinations include emissions from all affected sources at a facility. Once this has been determined, Iowa's Title V program allows for emission units to be defined as insignificant activities for the application and permitting process, if they meet the definition of an insignificant activity. Recent additions of combustion sources increase the facilities potential to emit above the major threshold for Carbon Monoxide at 105.17 tons per year. This resulted in additional units being added to the Title V permit.

Program Applicability:

- Major for PSD: No
- 40 CFR 60 NSPS: Yes
 - Subpart XXX – New Source Performance Standard (NSPS) -- Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014
- 40 CFR Part 61 NESHAP: Yes
 - Subpart M – Disposal of Asbestos Waste
- 40 CFR Part 63 NESHAP: Yes
 - Subpart AAAA – Municipal Solid Waste Landfills
- Major Source of HAPs: No
- Acid Rain: No.
- Stratospheric Ozone Protection: No
- Prevention of Accidental Releases: No

NSPS/NESHAP Applicability

40 CFR Part 60 Subpart XXX -- New Source Performance Standard (NSPS) -- Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014

This facility is an affected source under 40 CFR Part 60, Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills. This landfill has had construction, reconstruction or a modification after July 17, 2014 Referenced in Appendix A to this permit, and hereby incorporated by reference is 40 CFR Part 60, Subpart XXX. This landfill is required by this subpart to collect and control the gas generated within the landfill. This facility has elected to comply with the requirement by operating a gas collection system and treating the gas for subsequent use.

40 CFR Part 63 Subpart AAAA -- National Emission Standards for Hazardous Air Pollutants (NESHAP) -- Municipal Solid Waste Landfills for facilities (Without a Bioreactor)

This facility is an affected source under Subparts A (General Provisions) [40 CFR §63.1 – 40 CFR §63.15] and AAAA - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste Landfills [40 CFR §63.1930 – 40 CFR §63.1990]. Per the applicability criteria in Sec. 63.1935 and the definition of existing in Sec 63.1940, this is an existing source subject to 40 CFR Part 63, Subpart AAAA.

Changes Since the Last Issuance:

General Changes

- Permit number and relevant dates updated
- Permit contact updated
- Relevant rule citations updated in accordance with Executive Order 10
- The equipment list was updated to include roads and insignificant activities
- General Conditions updated

Emission Point Specific Changes

- EP 34 & EP 34.1 – NSPS applicability has changed from 40 CFR 60 Subpart WWW to 40 CFR 60 Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014. To reflect this change, relevant rule citations have been updated to reflect this change is NSPS applicability (pp. 8-17)

Stack Testing:

No requirements at this time.

Periodic Monitoring:

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document.

No requirements at this time.

Other Notes:

This facility is no longer subject to 40 CFR 60 Subpart WWW as indicated on several construction permits referenced throughout the Title V, but it is instead subject to 40 CFR 60 Subpart XXX. Since the State of Iowa has not yet adopted 40 CFR 60 Subpart XXX and 40 CFR 63 Subpart AAAA, the construction permits for certain emission points that reference the out-of-date subpart applicability have not been modified because the facility is not required to do so. In light of the new applicability, the facility has requested that only the correct applicable requirements be included in the Title V permit. Rule references have been corrected throughout the permit as needed.

To reflect the updates in NSPS applicability, the facility is encouraged to modify their construction permits at their earliest convenience.