## **Section 3**

## **Application Summary**

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The <u>Application Summary</u> shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

Routine or predictable emissions during Startup, Shutdown, and Maintenance (SSM): Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app\_form.html) for more detailed instructions on SSM emissions.

This application has been prepared to file for a New Source Review (NSR) permit for the Camino Real Landfill (CRLF). CRLF currently has a Title V Permit (Permit No. P186L-R3). This application is being filed under 20.2.72.200.A.1 NMAC and its submittal was also a Title V permit condition as part of the recent Title V renewal. This will be the first NSR permit for this facility.

Regarding landfill operations, CRLF is a municipal solid waste (MSW) landfill operating pursuant to NMED Solid Waste Facility Permit No. SWM-030738. The facility is currently authorized to dispose of MSW and the following approved special wastes:

- Petroleum contaminated soils (PCS);
- Sludge; and
- Industrial solid waste.

CRLF also operates a public convenience station for residential self-hauler customers and a registered, single-stream recycling center located adjacent to the landfill office.

Since, March 2001, CRLF has operated a gas collection and control system (GCCS), which routes landfill gas (LFG) to either a beneficial-use gas-to-energy plant, or an on-site open flare for destruction. The LFGE Plant, currently operating under NSR Permit No. 3275-M1-R1, is co-located on property owned by CRLF; and is owned and operated by Four Peaks Energy, Inc. of Santa Fe, New Mexico. This LFGE facility is a separate source (see Section 11). At this time, the GCCS is operated voluntarily at the Owner's discretion and is not required by rule; however, the GCCS must be operated and landfill subject to control requirements of 40 CFR 60, Subpart WWW no later than November 16, 2018.

Regarding Startup, Shutdown, and Maintenance (SSM) emissions, please refer to Section 14 for a description of the operational plan to mitigate these types of emissions. With regard to how any such emissions are accounted for in this application, the emissions calculations methods and assumptions included with them are conservative such that any such minor SSM emissions that might occur are encompassed within them.

Emissions between the previously approved Title V permit and this NSR application changed due to the fact that the Title V permit is for 5-years and the NSR permit period is for the life-of-site. As such, the NSR permit's potential emissions from the landfill and flare are based on the maximum landfill gas generation levels through the site's life (assumed to be in the year 2082), whereas the previous Title V permit projected potential-to-emit emissions were through the 5-year Title V period only (through 2021). As more waste gets landfilled in the future, more landfill gas is generated, making the landfill gas-related emissions in the NSR permit application higher. These increased emissions include volatile organic compounds (VOCs), hazardous air pollutants (HAPs), Hydrogen Sulfide (H2S), and flare combustion byproducts. Again, these are not new emissions sources: these increased emissions are based on extending the landfill's emissions through the site's life. Equipment and road emissions did not change since these are assumed to be maximums during the next 5-year period due to the location of the landfill's operation and conservative assumptions in the calculations.

Lastly, the permitted petroleum hydrocarbon land farm is included as a source in the emissions tables for the NSR permit to show maximum permitted emissions. This source was also included in the Title V renewal but did not include emissions maximums in the table (as permitted in prior Title V permitting actions). The emissions shown in the NSR permit are actually lower for the petroleum hydrocarbon landfarm than what would have been authorized in the Title V renewal since they are set to maintain total hazardous air pollutant emissions from the facility at less than 25 tons per year.

# **Section 4**

### **Process Flow Sheet**

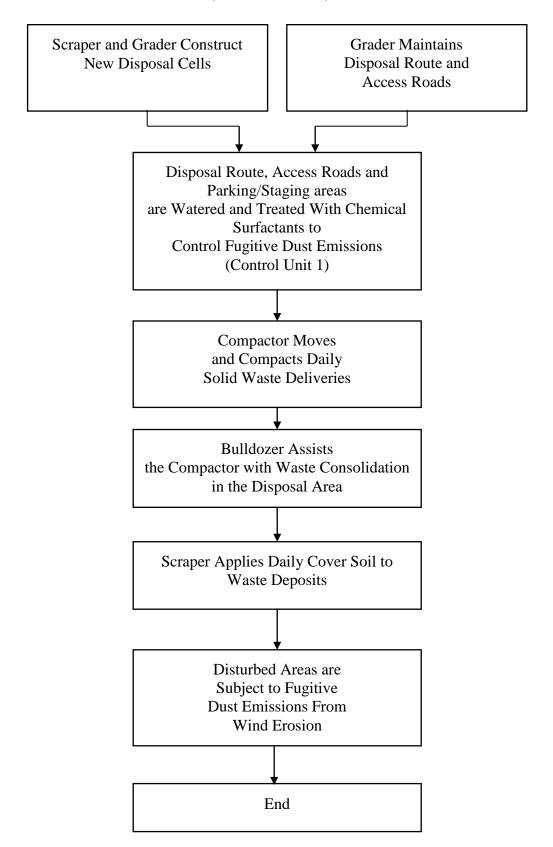
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A <u>process flow sheet</u> and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.

**Road Particulate Emissions** (Emissions Unit 1) Refuse Delivery And Miscellaneous Vehicles Arrive at the Landfill Gate House Records Vehicle Arrival Solid Waste is Miscellaneous Public Deliveries of Solid Waste Delivered to Disposal Vehicles Travel to Public Convenience Station via On Disposal Route Area via Paved Access Road Disposal Route and Access Roads Unloaded Vehicles Return To Gate House Vehicles Leave Facility Disposal Route & Access Roads Are Watered and Treated With Chemical Surfactants to Control Fugitive Dust Emissions (Control Unit 1) End

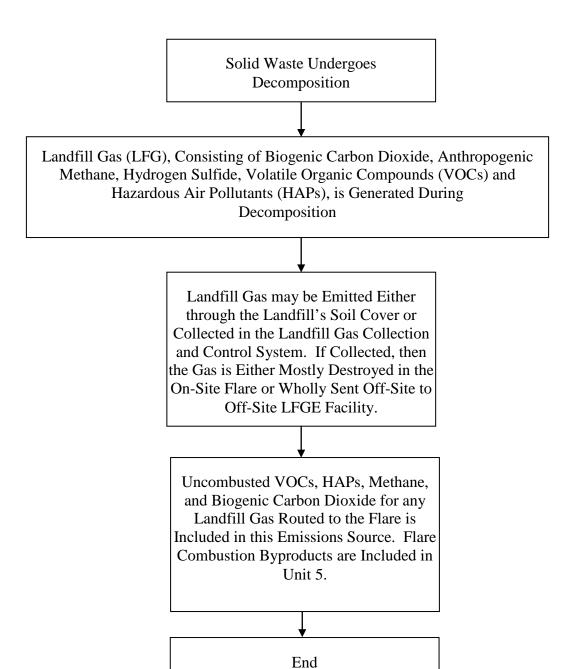
#### **Landfill Earthmoving Particulate Emissions**

(Emissions Unit 2)



#### **Landfill Gas Emissions**

(Emissions Unit 3)



#### **Petroleum Hydrocarbon Landfarm**

(Emissions Unit 4)

Petroleum Contaminated Soils Arrive at Gate House

Site Environmental Scientist Reviews Accompanying Waste Profile and Chemical Analyses

Gate House Directs Vehicle to Petroleum Hydrocarbon Landfarm

Gasoline and Diesel Fuel Contaminated Soils are Spread in Thin Lifts at Landfarm

Contaminated Soils are Disked to Facilitate Bioremediation and Aeration

Site Environmental Scientist Tracks Remedial Progress

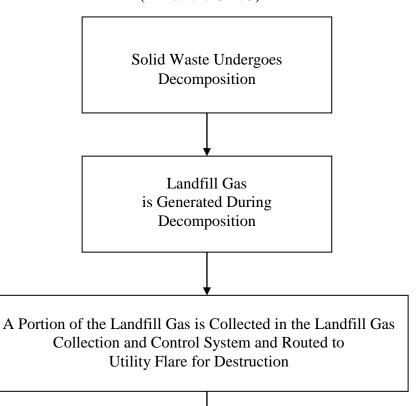
Soils are Tested to Verify That Remediation is Complete

Remediated Soils are Transported to the
Active Fill
Face and Used as
Daily Cover

End

#### **Landfill Gas Flare**

(Emissions Unit 5)



Flare Combustion Byproducts (CO, NOx, SO2, and PM10/PM2.5) are Included Here. Partially Destroyed Landfill Gas Components (VOCs, HAPs, Methane, Carbon Dioxide) are Included in Unit 3 Since these are Remaining, Undestroyed Landfill Gas Emissions.

End

# **Section 5**

## Plot Plan Drawn To Scale

A <u>plot plan drawn to scale</u> showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

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See next page for the plot plan.

Form-Section 5 last revised: 8/15/2011 Section 5, Page 1 Saved Date: 11/3/2017

