

## STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Despina Nikolova, Air Quality Engineer

Subject: Draft Operating Permit 3-0-254, City of Cheyenne  
Cheyenne Sanitary Landfill #1 (Happy Jack Landfill)

Date: March 14, 2013

### **Introduction:**

Attached for your review is the draft Wyoming Air Quality Standards and Regulations (WAQSR) Ch 6, Sec 3 operating permit for the Cheyenne Sanitary Landfill #1 (Happy Jack Landfill). The facility is an active municipal solid waste landfill for the city of Cheyenne. The Cheyenne Sanitary Landfill #1 (Happy Jack Landfill) began receiving solid waste in 1966, and it is expected to reach its capacity in approximately 2020. The principal emission source is the Municipal Solid Waste Landfill (LND-1).

### **Permitting History:**

There are no permits issued to the Cheyenne Sanitary Landfill #1 (Happy Jack Landfill) under WAQSR Ch 6, Sec 2.

### **Applicable Requirements:**

WAQSR Chapter 4, Section 4 requires sources with a design capacity of greater than 2.5 million megagrams (2.75 million tons) and 2.5 million cubic meters (3.27 million yards) to obtain Chapter 6, Section 3 operating permits. The Cheyenne Sanitary Landfill #1 (Happy Jack Landfill) meets those criteria and is required to have an operating permit. WAQSR Chapter 4, Section 4 requires landfills to determine their Non-Methane Organic Compounds (NMOC) emissions as outlined in 40 CFR 60, Subpart WWW - *Standards of Performance for Municipal Solid Waste Landfills*. Based on Tier 2 testing conducted in 2012, the facility estimates NMOC emissions to be less than 50 megagrams/yr (55 tons per year). Additional NMOC control measures are not required.

### **Periodic Monitoring:**

The permittee must calculate the NMOC emissions from the landfill annually using the procedures specified in §60.754 of 40 CFR 60, Subpart WWW. The site-specific value derived from testing shall be retested every 5 years in accordance with §60.754 while the landfill is in operation. If calculated NMOC emissions meet or exceed 50 Mg/yr (55 TPY) the permittee shall comply with the collection and control system requirements specified in §60.752(b)(2). All monitoring shall be continued until such date that the landfill is closed. A Closure Notification shall be submitted in accordance with §60.757(d). If NMOC emission controls were never required, and all WAQSR Ch 6, Sec 3 operating permit conditions are satisfied at the time of closure, the permittee may request that their Ch 6, Sec 3 permit be rescinded in compliance with §60.752(d).