

Sunny Farms Landfill

Information Session and Public Hearing Draft Air Title V Permit

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August 25, 2022



Outline

- Sunny Farms Landfill odor/emissions history
- Tools used to measure odor/emission compliance
- Landfill authorizations

Site's Odor History

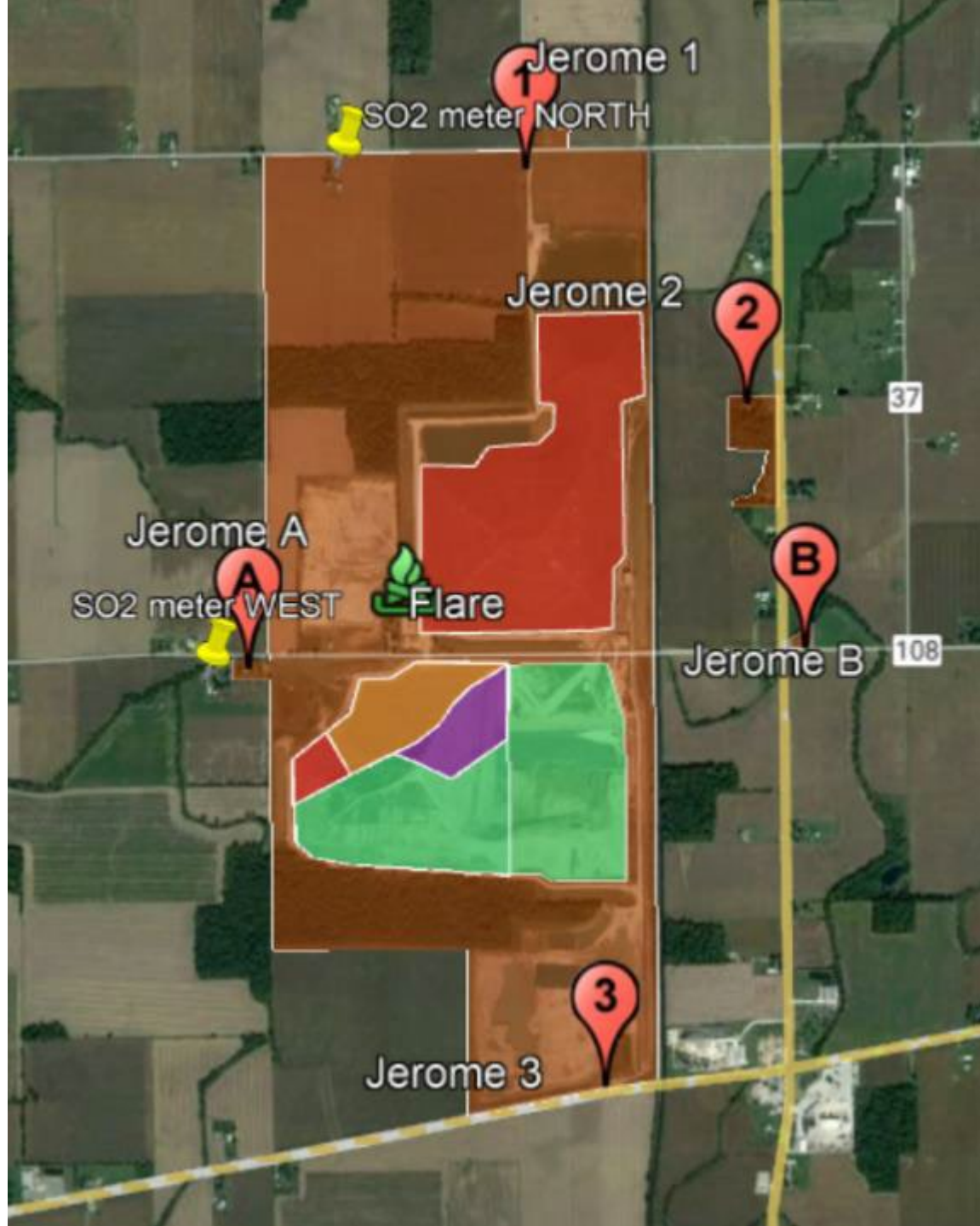
- Drywall – gypsum
- Railed waste includes drywall
- Hydrogen sulfide (H_2S) = rotten egg odor
- Hydrogen sulfide + flare = sulfur dioxide
- Sulfur dioxide (SO_2) = struck match odor

Site's Odor History

- Rail access in place since 2004
- First enforcement for odors 2013
- Late 2018 odor challenges return
- Recent enforcement related to odors and emissions: January 2019 and July 2019
- Hydrogen sulfide odors reduced
- Sulfur dioxide emissions increased

SO₂ Emissions

- Collecting & flaring H₂S results in SO₂
- Modeling confirmed that current levels of SO₂ meet National Ambient Air Quality Standards
- SO₂ sampling is overseen by Ohio EPA at two adjacent monitor locations



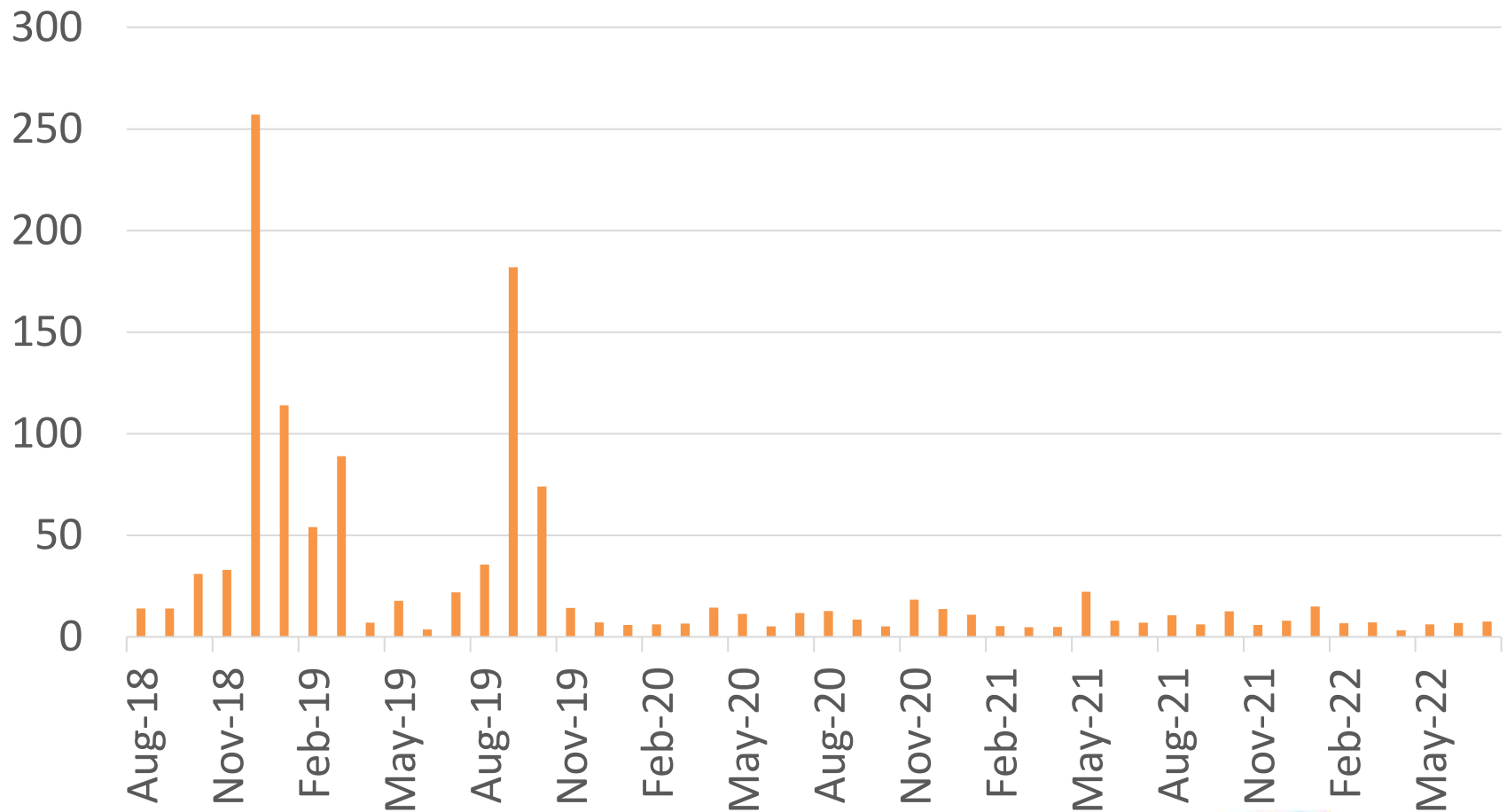
July 2019 Consent Order - DAPC

- The facility is in compliance with the orders
- Flare elevated February 2020
- PTI for sulfur control issued December 2021

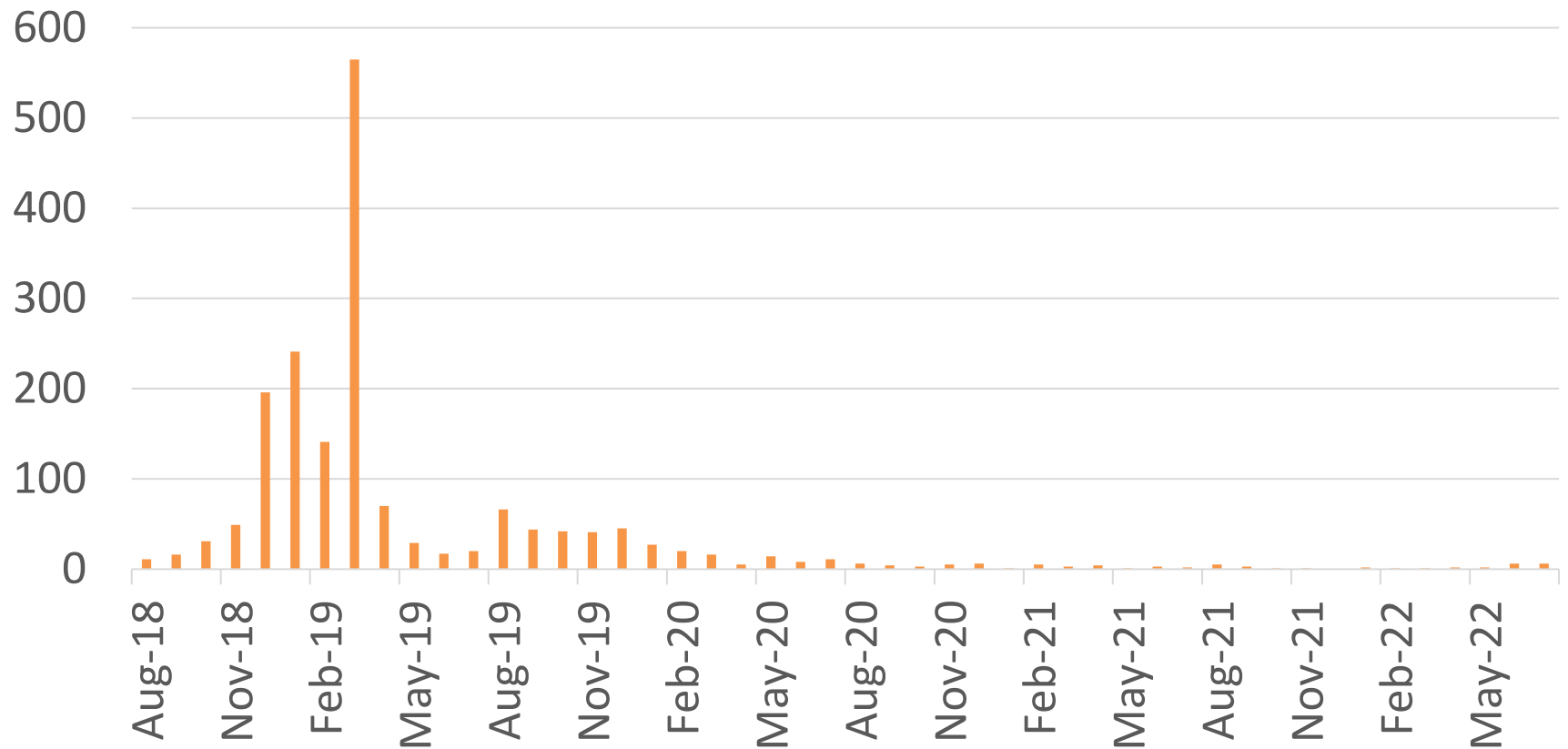
July 2019 Consent Order - DAPC

- Remaining milestones include:
 - Install/operate the sulfur control technology
 - Due next summer
 - Test the new control technology
 - Within 90 days of commencing operation

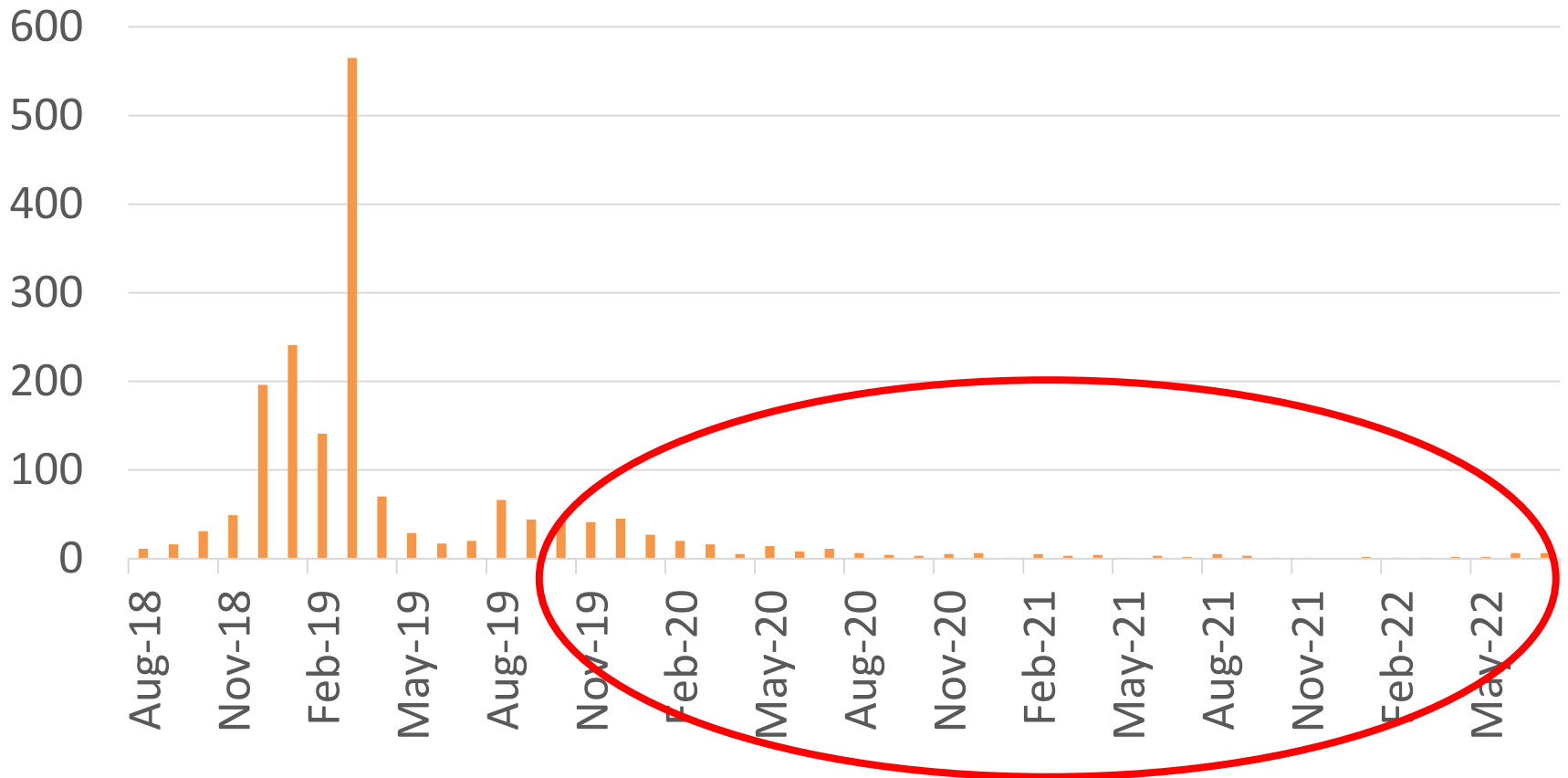
Highest H₂S Reading Each Month (ppb)



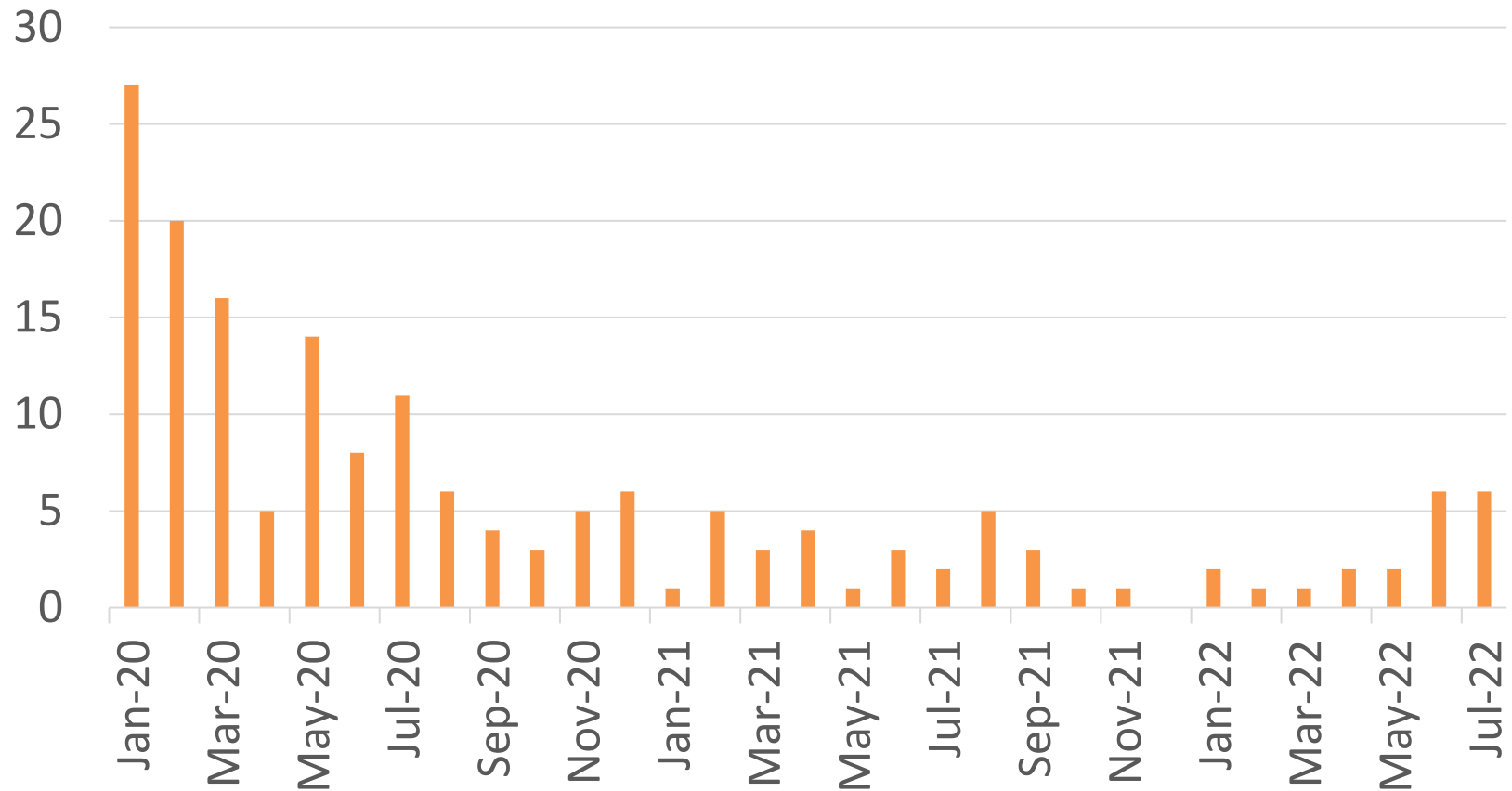
Calls to the Odor Hotline 1-866-419-8639



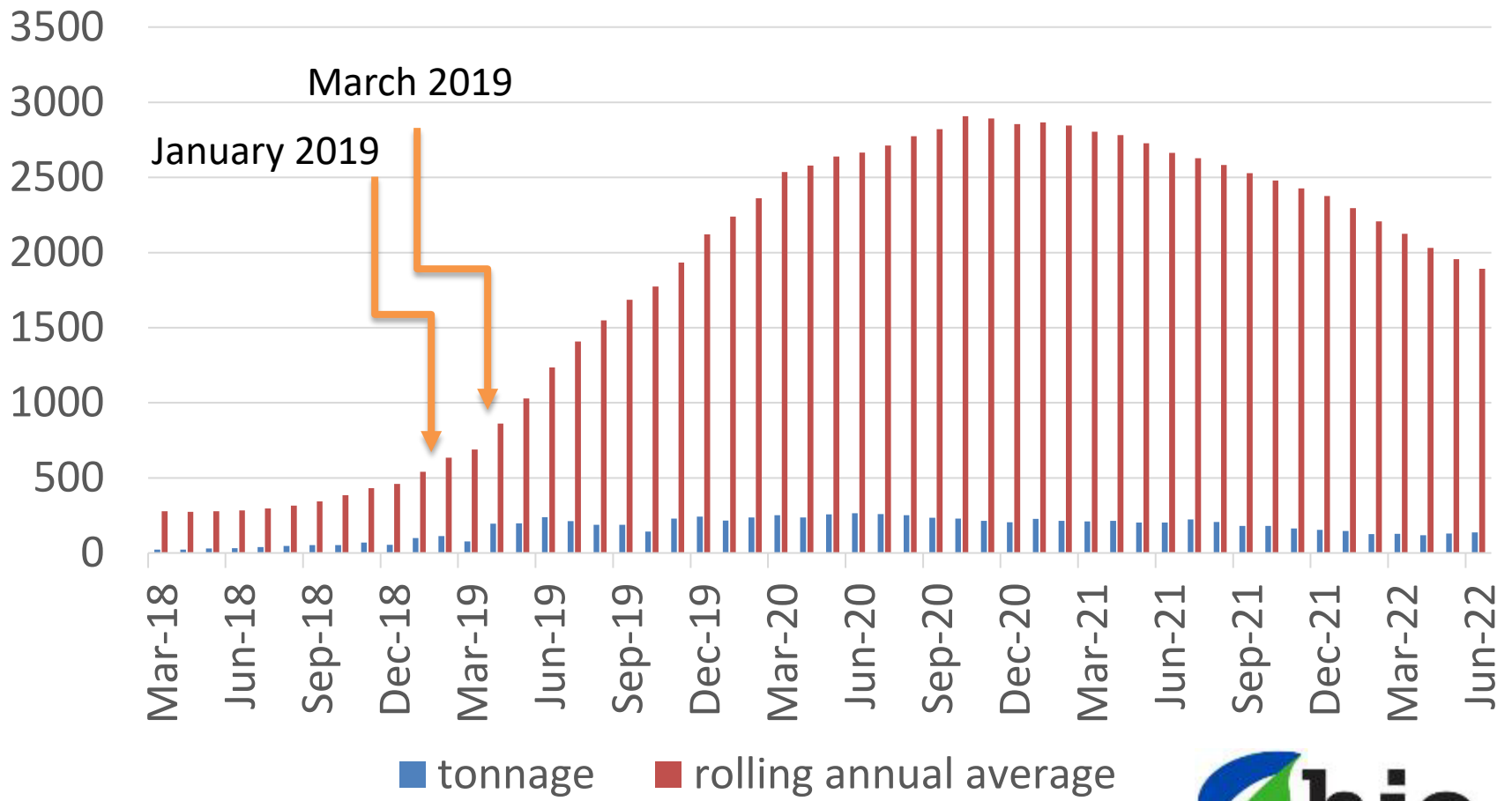
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SO₂ Emissions (tons)



Required Landfill Authorizations

- **Ohio EPA – Solid Waste**
 - Permit
- **Seneca County General Health District**
 - Annual License
- **Ohio EPA – Surface Water**
 - Permits to install and discharge permit(s)
 - Isolated wetland permit (if necessary)
 - Wetland 401 certification (if necessary)
- **U.S. Army Corps of Engineers**
 - 404 permit (if necessary)
- **Ohio EPA – Air**
 - PTI's for emission sources
 - Title V permit to operate

Summary

- Controlling the H₂S emissions created SO₂ emissions
- The SO₂ emissions meet the National Ambient Air Quality Standards
- The SO₂ emissions will be further reduced
- All of our objectively tracked metrics continue to show odors are being effectively managed
- A Title V Permit is just one of the numerous authorizations a landfill is required to obtain

Outline

- Title V Permit Program
- Title V Permit Requirements
- Title V Permitting Process

Background

- Aug. 30, 2021 – Public hearing for draft PTI
 - Required installation of control equipment
- Dec. 1, 2021 – PTI issued final
 - 550-day timeclock started
- Jan. 27, 2022 – Started processing renewal Title V Permit
 - Requires operation of control equipment
 - Does **not** approve expansion

What is Title V?

- Nationwide air permitting program required by 1990 Clean Air Act
- Designed to streamline permitting process
- Consistency between states and territories
- Opportunity for citizens to be involved in permit review process
- Enhanced monitoring and record keeping requirements

Title V

Permit to Operate

- Permit requires operation of control equipment
- Reevaluated every five years

Permit Requirements

- Incorporates all active permits to install
- Cites applicable rules
- Requires monitoring, record keeping, and reporting
- Requires emissions testing

Title V Permitting Process

- Jan. 27, 2022 -- Revised Title V application received
- March 18, 2022 -- Draft permit issued
- **Aug. 25, 2022 -- Public hearing**
- Sept. 5, 2022 -- End of comment period

Next Steps

- Preliminarily Proposed Permit (PPP) issued with the Response to Comments document
- PPP – Applicant may request conference within 14 days of issuance
- Proposed Permit – 45-day review period for U.S. EPA
- Recommendation to Director – Final action taken
- Final decisions can be appealed

Sunny Farms Landfill's Draft Title V

- Allows continued operation of air emission control systems associated with the landfill, railcar unloading building, and roadways
- This permit does **not** approve any expansion

How to Submit Comments on Title V

- Testify this evening
- Submit written comments by Sept. 5, 2022

email: alyse.wineland@epa.ohio.gov

U.S. mail: Ohio EPA-NWDO

attn: Alyse Wineland

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Questions After Tonight

Permit updates and general environmental concerns:

Heather Lauer

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Public Interest Center

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heather.lauer@epa.ohio.gov

Questions

You can find the presentation and additional materials under Public Meeting Materials at <https://epa.ohio.gov/divisions-and-offices/public-interest-center>