



ECO-VISTA LANDFILL, LLC

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January 31, 2022

Arkansas Department of Environmental Quality
Air Division – Enforcement Branch
Attn: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

Mr. Robert Todd
US EPA Region 6
Air Enforcement Section (6EN-AA)
1445 Ross Avenue
Dallas, Tx 75202-2733

SUBJECT: 2021 Annual Compliance Certification (GP-21)¹
Report Period: January 1, 2021 through January 10, 2021
Eco-Vista, LLC (Waste Management Eco-Vista Landfill)
Permit # 1884-AOP-R6 AFIN # 72-00144

To Whom It May Concern:

This letter and attached documentation represent the 2021 Annual Compliance Certification (ACC) for the above referenced facility. The ACC is being submitted to the Arkansas Department of Environmental Quality (ADEQ) in compliance with General Provision 21 of the existing Title V Permit No. 1884-AOP-R6.

If you have any questions regarding this report, please feel free to contact me at (501) 993-8966.

Sincerely,

Waste Management of Arkansas, Inc.
On Behalf of the Eco-Vista Landfill

Jodi Reynolds-Coffelt
Environmental Protection Manager
Waste Management of Arkansas, Inc.

Attachment – Annual Compliance Certification

cc: Eco-Vista POR

¹ Another GP-21 Report will be submitted to cover the timeframe of 1/11/2021 – 12/31/2021. That reporting period was covered by Title V Operating Permit # 1884-AOP-R7 and Title V Operating Permit # 1884-AOP-R8.

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
SC-1	SN-01	Landfill Gas Surface Emissions (Fugitive)	VOC (NMOC)	The permittee shall not exceed the emission rates set forth in the following table. Both hourly and annual fugitive surface emissions (SN-01) are worst case scenario when the GCCS is not in operation. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Conditions #7, and #9. [Reg. §19.501 et seq., 40 CFR Part 60 Subpart WWW, and 40 CFR Part 52, Subpart E]	69.7 tpy	In accordance with Plantwide Condition 7 (PC-7) the permittee has not exceeded the maximum design capacity (15,990,000 cubic yards) specified in Solid Waste Permit #0290-S1-R3 and weighs every incoming load of waste accepted at the facility. Also, in accordance with PC-9, the permittee maintains a lifetime in-place total, a 12-month rolling total, and each individual month's waste acceptance data onsite. These records will be retained for at least 5 years and will be available for review by ADEQ personnel upon request. The permittee demonstrates compliance with SC-01 and SC-02 based on compliance with PC-7 and PC-9.	Y

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10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC

AFIN: 72 - 00144

Permit: 1884-AOP-R6

Period: 01/01/2021 through 01/10/2021

(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition		(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
SC-2	SN-01	Landfill Gas Surface Emissions (Fugitive)	1,1 Dichloroethane	The permittee shall not exceed the emissions rates set forth in the following table. Both hourly and annual uncontrolled surface emissions (SN-01) are worst case scenario when the GCCS is not in operation. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition #7, #9. [Reg.18.801, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]	0.08 lb/hr	0.32 tpy	In accordance with Plantwide Condition 7 (PC-7) the permittee has not exceeded the maximum design capacity (15,990,000 cubic yards) specified in Solid Waste Permit #0290-S1-R3 and weighs every incoming load of waste accepted at the facility. Also, in accordance with PC-9, the permittee maintains a lifetime in-place total, a 12-month rolling total, and each individual month's waste acceptance data onsite. These records will be retained for at least 5 years and will be available for review by ADEQ personnel upon request. The permittee demonstrates compliance with SC-01 and SC-02 based on compliance with PC-7 and PC-9.	Y
			1,1 Dichloroethylene		0.01 lb/hr	0.04 tpy		
			Dichlorobenzene		0.21 lb/hr	0.91 tpy		
			Ethyl benzene		0.70 lb/hr	3.06 tpy		
			Toluene		2.27 lb/hr	9.93 tpy		
			Vinyl Chloride		0.05 lb/hr	0.19 tpy		
			Xylenes		1.71 lb/hr	7.47 tpy		

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10/15/2008

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(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition		(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)						
SC-3	SN-02A and SN-02B and SN-04 through SN-08	Flares and Engines	Operating Scenario #1	The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #12, #18, and #19, which bubbles hourly and annual emissions, using the worst-case scenarios appropriate for each individual criteria pollutant. [Reg.19.501 <i>et seq.</i> , and 40 CFR § 52 Subpart E]	Operating Scenario #1		The permittee has not operated more than one flare when five (5) engines were operating simultaneously as required in SC-12. The permittee has not exceeded the emissions limits allowed in the table. This was confirmed by the results of the Engine performance test conducted on 10/19-20/20 and 11/18/20.	Y						
			PM ₁₀		2.6 lb/hr	10.0 tpy								
			SO ₂		18.0 lb/hr	78.8 tpy								
			VOC (NMOC)		0.8 lb/hr	3.2 tpy								
			CO		55.6 lb/hr	221.6 tpy								
			NO _x		10.4 lb/hr	40.8 tpy								
			Operating Scenario #2		Operating Scenario #2									
			PM ₁₀		3.7 lb/hr	14.2 tpy								
			SO ₂		13.9 lb/hr	56.7 tpy								
			VOC (NMOC)		3.8 lb/hr	16.8 tpy								
			CO		57.3 lb/hr	240.4 tpy								
			NO _x		23.2 lb/hr	100.3 tpy								
			SC-4		SN-02A and SN-02B and SN-04 through SN-08	Flares and Engines			Operating Scenario #1	The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition #12. Hourly emissions are based on highest possible standard cubic feet per minute (scfm) per emission source and highest methane concentration of 55% LFG. Annual emissions (tpy) are bubbled for Flares (SN-02A/B) and Engines (SN-04 through 08) using the appropriate worst-case operating scenarios for the criteria pollutant. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]	Operating Scenario #1		The permittee has not operated more than one flare when five (5) engines were operating simultaneously as required in SC-12. The permittee has not exceeded the emissions limits allowed in the table. This was confirmed by the results of the Engine performance test conducted on 10/19-20/20 and 11/18/20.	Y
									PM		2.6 lb/hr	10.0 tpy		
HCl	1.34 lb/hr	5.82 tpy												
Operating Scenario #2	Operating Scenario #2													
PM	3.7 lb/r	14.2 tpy												
HCl	1.01 lb/hr	4.38 tpy												

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(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
SC-5	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	Visible Emissions	An initial visible emission test using EPA Method 22 was completed for the flare system and additional performance testing is conducted on the generating units every 8,760 hours or 3 years, whichever comes first. The Flares (SN-02A/B) shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours. This initial visible emission test was performed on SN02A and SN02B on February 23, 2011. No additional Method 22 Test is required for SN02A and SN02B unless a new flare unit is installed or significant modifications are made to the flares. [Reg. 19.303, Reg.19.304, 40 CFR §60.18(b) through (f), and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]	Facility must maintain records of the Method 22 test to determine compliance with the visible emission provisions of the flare and engines.	A performance test on SN-02A & SN-02B and a Method 22 test was conducted on Wednesday February 23, 2011. The Method 22 test results demonstrated compliance with SC-05. No additional Method 22 test is required for SN-02A & SN-02B unless a new flare unit is installed or significant modifications are made to the existing flare unit that could alter the potential emissions. In accordance with SC-06, the facility conducts weekly VE observations for SN-04 through SN-08. The facility records when/if visible emissions occur.	Y

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SC-6	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	Visible Emissions	Visible emissions from the engines (SN-04, 05, 06, 07 & 08) may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance shall be demonstrated by burning only landfill gas as fuel at these sources.	04, 05, 06, 07, 08 Limit is 5% Opacity	No visible emissions for SN-02A and SN-02B And SN-04 through SN-08. Only LFG is used as a fuel source for the engines.	Y
SC-7	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	The permittee shall post and maintain clearly visible labels at flares SN-02A and SN-02B that identifies each flare as a distinct and separate emission source. [Reg.19.304 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]	Post and maintain visible labels on flares.	Labels have been placed on flares SN-02A and SN-02B to clearly identify each flare as a distinct and separate emission source.	Y
SC-8	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	The permittee must operate each flare (SN-02A and 02B) pilot flame within the design limitations and manufacturer's specifications. The pilot flames may be lit by landfill gas, natural gas, or propane. [Reg.19.303 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]	Facility must operate flares within the design limitations and manufacturer's specifications.	The flare is being operated within the design limitations and manufacturer specification. The pilot is lit using propane and the flame is maintained using LFG.	Y

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SC-9	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	Each flare (SN-02A and 02B) must have a flame present at all times of operation or if no flame is present, the orifice of the unlit flare must be closed and the GCCS piping to the unlit flare shutdown to prevent passive venting of uncontrolled landfill gases. The presence of a flare pilot light for each flare shall be monitored continuously using a thermocouple, an ultraviolet sensor or any other equivalent device to detect the presence of a flame. In the event of a flame failure, the permittee shall shut down the GCCS to prevent passive venting of landfill gas. [Reg.19.303, Reg.19.304, 40 CFR §§60.18(b) through (f) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]	Facility must have flame present at all times, or if no flame is present, must use controls to prevent passive venting of uncontrolled landfill gas.	The flare has been operated such that a flame is present at all times during operation. When the flare is not operating, an automatic valve will close and the system will shut down to prevent passive venting of LFG.	Y
SC-10	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	Flares shall be used only with the net heating value of the landfill gas being combusted being 200 BTU/scf (7.45MJ/scm) or greater for non-assisted flares (SN-02A and 02B). The net heating value of the gas being combusted shall be determined by the methods specified in 40 CFR §60.18(f)(3). A copy of the calculations shall be kept on site and made available to Department personnel upon request. [Reg.19.303, Reg.19.304, 40 CFR §§60.18 (c)(3)(ii). and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]	The flare shall be used only when the net heating value of the landfill gas being combusted is 200 BTU/scf or greater.	Based on the Performance Test conducted on February 23, 2011, the Heating Value of the LFG being combusted is approximately 530 BTU/scf (>200 BTU/scf)	Y

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SC-11	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	Non-assisted flares (SN-02A and 02B) shall be designed for and operated with an exit velocity less than 60 ft/sec (18.3 m/sec). The maximum permitted velocity shall be calculated as specified in 40 CFR §60.18(f)(5). The actual exit velocity shall be determined as specified in 40 CFR §60.18(f)(4). A copy of the calculations shall be kept on site and made available to Department personnel upon request. [Reg.19.303, Reg.19.304, 40 CFR §60.18(f)(4-5) and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]	The flare shall be operated with an exit velocity less than 60 ft/sec.	Based on the Performance Test conducted on February 23, 2011, the Flare Tip Velocity is approximately 32.9 ft/sec (<60 ft/sec)	Y
SC-12	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	The permittee may operate only under one of the seven Operating Scenarios (OS), a combination of flares (SN-02A and/or SN-02B) and engines (SN-04 through SN-08), as listed in the Operating Scenario Table. In addition EVLF may only combust LFG to one flare (SN-02A or SN-02B, 1837 scfm) when five engines are operating simultaneously (OS#2). EVLF must maintain operational gas flow limits on the flares to limit flaring to the levels associated with operating between zero and five engines in order to maintain the permitted emission levels in Specific Conditions #3 and #4.	Operate under one of the seven Operating Scenarios. Maintain operational gas flow limits on the flares to maintain the permitted emission levels.	The permittee has not operated more than one flare when five (5) engines are operating simultaneously as required. The facility has operated in compliance with the scenarios listed in this permit condition	Y

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SC-13	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	The permittee shall maintain records to demonstrate compliance with Specific Condition #12. These records shall include the number of engines operating and the simultaneous gas flow to the flares and engines in standard cubic feet per minute (scfm). The permittee shall monitor the gas flow to the flares and total gas flow to the number of operating engines simultaneously and continuously. The gas flow to the flares shall be recorded once every 15 minutes. Electronic or paper hourly records shall be maintained of the number of engines operating and the flow rate to the flares. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain, shall be maintained on site and made available to Department personnel upon request.	Gas flow to the flares shall be recorded once every 15 minutes. Electronic or paper hourly records shall be maintained of the number of engines operating and the flow rate to the flares.	The permittee maintains records to demonstrate compliance with Specific Condition 12. The gas flow to the flares and total gas flow to the number of operating engines is monitored and recorded every 15 minutes. These records are updated by the 15 th day of the month following the month to which the records pertain and are maintained on site and are available upon request.	Y
SC-14	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	Each engine, SN-04 through SN-08, must be equipped with a non-resettable hour meter. The facility must keep records of the hours of operation of the engines recorded through the non-resettable hour meter and submit it in accordance to Plantwide Condition #3, at the address in General Provision #7, maintain a copy on-site and make available to Department personnel upon request.	Engines must be equipped with a non-resettable hour meter.	Each engine has a non-resettable hour meter. Records to comply with Specific Condition 14 are maintained on-site and are available for department personnel to review upon request.	Y

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SC-15	SN-02A and SN-02B and SN-04 through SN-08	Flares and Engines	n/a	<p>The permittee may replace any currently permitted engine on a temporary or permanent basis with a replacement engine, defined as an engine that is of the same make, model and design capacity of the engine being replaced. The engine will have the same or lower permitted emission rates on a pound per hour and ton per year basis, have the same or lower horsepower, and will not violate any regulations promulgated by the EPA. The permittee shall notify ADEQ of the replacement within 30 days of startup and the notice will provide the startup date and a statement indicating the engine's status under 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ. Replacement engines subject to Subpart JJJJ shall comply with testing requirements in Specific Condition #21. Replacement engines that are exempt from Subpart JJJJ shall be subject to an initial test to verify NOx and CO emission rates within 90 days of the startup date of the replacement engine. This testing shall be conducted in accordance with Plantwide Condition #3. Unless otherwise approved by the Department, testing shall be conducted with the source operating at least at 90% of its permitted capacity. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. Extrapolation shall be the standard linear extrapolation or other method of extrapolation as approved by the Department prior to testing. The permittee shall measure the operation rate during the test. The testing shall be conducted in accordance with EPA Reference Method 7E for Nox and EPA Reference Method 10 for CO.</p>	Replacement engines must comply with 40 CFR Part 60 – JJJJ and 40 CFR Part 63 – ZZZZ	<p>In accordance with the WM Renewable Energy, LLC's (WMRE) routine maintenance program, SN-05, SN-06, SN-07, and SN-08 were replaced. Replacement Engines SN-05 and SN-06 were installed on 2/15/2017 and SN-07 and SN-08 commenced operation on 4/4/2017. Replacement Engine SN-06 is exempt from the requirements of 40 CFR 60 Subpart JJJJ, therefore, an initial perform test must be completed to verify NOx and CO emission rates within 90 days of the start-up date. The notification for SN-05 and SN-06 was submitted to the ADEQ on 2/20/17; while the notification for SN-07 and SN-08 was submitted to the ADEQ on 4/6/17. The facility completed an initial performance test on Replacement Engines SN-05, SN-06, SN-07, and SN-08 on 5/9-10/17. commenced operation on 4/4/2017. Replacement Engine SN-06 is exempt from the requirements of 40 CFR 60 Subpart JJJJ, therefore, an initial perform test must be completed to verify NOx and CO emission rates within 90 days of the start-up date. The notification for SN-05 and SN-06 was submitted to the ADEQ on 2/20/17; while the notification for SN-07 and SN-08 was submitted to the ADEQ on 4/6/17. The facility completed an initial performance test on Replacement Engines SN-05, SN-06, SN-07, and SN-08 on 5/9-10/18. Replacement Engine SN-04 Tested on 10/3/19.</p>	Y
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SC-16	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	SN-04 through SN-08 are new 4SLB, stationary reciprocating internal combustion (RICE) engines located at Eco-Vista, LLC landfill, an area source of HAP emissions. The engines combust landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis. These engines are subject to and shall comply with the provisions of 40 CFR Part 63, Subpart ZZZZ – <i>National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</i> (RICE) (Appendix C) by meeting the requirements of 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for SN-04 through SN-08 under 40 CFR Part 62, Subpart ZZZZ. [Regulation 19, §19.304 and 40 CFR Part §63.6580, Subpart ZZZZ, §63.6590(c)]	Comply with the provisions of 40 CFR Part 63 Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart JJJJ, for spark ignition engines.	SN-05, SN-07, and SN-08 are operating in compliance with NSPS JJJJ; therefore, these engines have satisfied the requirements of 40 CFR 63, Subpart ZZZZ. SN-04 and SN-06 are exempt from 40 CFR 60 Subpart JJJJ requirements; therefore, they are only subject to the requirements of 40 CFR 63 Subpart ZZZZ. The permittee operated in compliance with the applicable provisions of Specific Condition 24. Only LFG is combusted in these engines.	Y

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SC-17	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	SN-04 through SN-08, non-certified stationary spark ignition (SI) reciprocating internal combustion engines (RICEs), were ordered after January 1, 2008. These engines, SN-04 through SN-08, are subject to and shall comply with 40 CFR Part 60, Subpart JJJJ – <i>Standards of performance for Stationary Spark Ignition Internal Combustion Engines</i> .	Comply with 40 CFR Part 60 - JJJJ	The most recent Engine Performance Test for SN-08 was conducted on 11/18/20. The report was submitted to the Department on 1/11/2021. An initial performance test was completed on Replacement SN-04, which is exempt from 40 CFR 60, Subpart JJJJ, on 10/3/19. Also, note that SN-06 is exempt from 40 CFR 60, Subpart JJJJ, so the testing completed 5/9/17 serves as the initial performance test.	Y
SC-18	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	NOX	The permittee must comply with applicable emission limitations and standards used to permit hourly and annual rates for SN-04 through SN-8, specified for NO _x , CO and VOC emissions. The following table summarizes the not-to-exceed emission limits permitted for these sources. Compliance with these emission limits is deemed to be compliance with the emission limits of Specific Condition #19.	1.50 grams/bhp-hr	The facility is in compliance with the applicable emission limitations based on the Engine Performance Test conducted on 5/9-10/17 (Exempt SN-04 and SN-06). The report was submitted to the Department on 7/17/17. The report for the test conducted on 10/3/19 (SN-04) was submitted on 10/29/19.	Y
			CO		2.70 grams/bhp-hr		
			VOC		1.0 grams/bhp-hr		

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SC-19	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	NOX	The permittee must comply with applicable NSPS Subpart JJJJ emission limitations and standards for SN-04 through SN-08 specified for NO _x , CO and VOC emissions in the table below, based on an engine manufacture date after July 1, 2007 and/or after July 1, 2012.	3.0 grams/bhp-hr or 2.0 gram/bhp-hr (depending on date of manufacture)	The facility is in compliance with the applicable emission limitations based on the Engine Performance Test conducted on 3/19-20/20 (SN-05, SN-07, SN-08). The report was submitted to the Department on 5/19/2020.	Y
			CO		5.0 grams/bhp-hr		
			VOC		1.0 grams/bhp-hr		
SC-20	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	The permittee must operate and maintain all stationary SI RICE (SN-04 through SN-08) subject to 40 CFR Part 60 Subpart JJJJ in compliance with Specific Condition #19 over the entire life of the engine.	Operate and maintain stationary SI RICE in compliance with Specific Condition 17.	The results of the performance test performed on 3/19-20/20 (SN-05, SN-07, SN-08) demonstrates compliance with Specific Condition 19.	Y
SC-21	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	The permittee must conduct an initial performance test on each engine subject to testing under 60 Subpart JJJJ (SN-04 through SN-08) To demonstrate compliance with the applicable pollutant emission standards of Specific Conditions #18 and #19. Subsequent performance testing must be conducted every 8,760 hours or 3 years per engine, whichever comes first thereafter to demonstrate compliance. Each performance test must be conducted according to Plantwide Condition #3, Specific Condition #22 and as specified in the following procedures:	Must conduct an initial performance test and subsequent performance testing every 8,760 hours or 3 years, whichever comes first.	The Engine Performance Tests were conducted on 3/19-20/20 (SN-05, SN-07, SN-08). Performance testing analytical data verified that Engines SN-04 through SN-08 emissions meet stationary RICE standards set forth in SC-18 and SC-19.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
SC-22	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	The permittee must submit to the department a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed. [Regulation 19, 19.304 and 40 CFR 60.4245(d)]	Submit a copy of the performance test.	The facility is in compliance with the applicable emission limitations based on the Engine Performance Test conducted on 3/19-20/20 (SN-05, SN-07, SN-08) The report was submitted to the Department on 5/19/20 (SN-05, SN-07, SN-08).	Y
SC-23	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	For all non-certified stationary SI RICEs subject to Subpart JJJJ greater than or equal to 500 hp (SN-04 through SN-08), the permittee must keep a maintenance plan and records for each engine of conducted maintenance and must, to the extent practicable, maintain and operate each engine and control device in a manner consistent with good air pollution control practice for minimizing emissions. [Regulation 19, §19.304 and 40 CR Part 60 Subpart JJJJ, §60.424(b)(2)(ii)]	Keep maintenance plan and records for each engine.	The permittee, to the extent practicable, maintains and operates each engine and control device in a manner consistent with good air pollution control practice for minimizing emissions. A copy of the maintenance plan and maintenance records are filed onsite.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
SC-24	SN-02A and SN-02B and SN-04 through SN- 08	Flares and Engines	n/a	In addition, the permittee shall submit to the Department, maintain on-site and make available to Department personnel upon request, a comprehensive report showing compliance of each engine with NSPS Subpart JJJJ within 60 days of the completion of the initial tests rather than the 30 days as specified under Plantwide Condition #3. The report shall be submitted to the Department at the address listed in General Provision #7.	Must meet notification, reporting and recordkeeping requirements for all engines subject to 40 CFR Subpart JJJJ.	The facilities 40 CFR Subpart JJJJ Initial Notification Report was submitted to the Department on January 21, 2011. The original Initial Engine Performance Test report was submitted to the Department on 4/25/11 for SN-05 and 5/26/11 for SN-04, SN-06, SN-07 and SN-08.	Y
SC-25	SN-03	Traffic Emissions (Uncontrolled)	PM ₁₀	The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #27 and #28 [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]	38.9 lb/hr and 84.9 tpy	The permittee has maintained compliance with this requirement by implementation of the dust control measures indicated in SC-27 and SC-28.	Y
SC-26	SN-03	Traffic Emissions (Uncontrolled)	PM	The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions #27 and #28. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]	106.35 lb/hr and 326.3 tpy	The permittee has maintained compliance with this requirement by implementation of the dust control measures indicated in SC-27 and SC-28.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

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SC-27	SN-03	Traffic Emissions (Uncontrolled)	PM/PM ₁₀	The permittee shall not operate in a manner such that fugitive emissions from the storage piles, aggregate handling, and haul roads (SN-03) would cause a nuisance off-site or allow visible emissions from extending beyond the property boundary. Under normal conditions, off-site opacity less than or equal to 5% shall not be considered a nuisance. The permittee shall use water sprays, sweeping, or other techniques as necessary to control fugitive emissions that migrate off-site. [Regulation 18, §18.501 and A.C.A. §84- 203 as referenced by A.C.A. §8-4-304 and §8-4-311]	On-site water dispersion equipment or will be operated at the facility.	The facility maintains dust control measures to reduce potential fugitive emissions, including water dispersion equipment sweeping, and other techniques.	Y
SC-28	SN-03	Traffic Emissions (Uncontrolled)	PM/PM ₁₀	Dust suppression activities must be conducted in a manner and at a rate of application that will not cause runoff from the area being applied. Best Management Practices (40 CFR §122.44(k) should be used around streams and waterbodies to prevent the dust suppression agent from dust suppression agent from entering Waters of the State. Except for potable water, no agent shall be applied within 100 feet of wetlands, lakes, ponds, springs, streams, or sinkholes. Failure to meet this condition may require the permittee to obtain a National Pollutant Discharge Elimination System (NPDES) permit from the Department's Water Division, in accordance with 40 CFR §122.1(b). [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]	On-site water dispersion equipment or will be operated at the facility in accordance with 40 CFR §122.	The facility maintains dust control measures to reduce potential fugitive emissions, including water dispersion equipment sweeping, and other techniques.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

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(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
PWC-1	Area	n/a	n/a	The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the facility and/or facility target production rate. [Regulation 19, §19.704, 40CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. § 8-4-304 and §8-4-311]	Permittee will notify the Director as required by PC-1	The facility became operational in 11/22/2010. An initial notification was submitted to the ADEQ on 1/21/11. All subsequent notifications have been submitted to the ADEQ thereafter.	Y
PWC-2	Area	n/a	n/a	If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit.	Permittee will start construction of open candlestick flare and or engines prior to 180 days from the issuance of permit R2.	Construction of the Flare and Engines commenced within eighteen months of the initial notification and has been installed. Any future engine and/or flare installations will be commenced within eighteen months of the initial notification.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
PWC-3	Area	n/a	n/a	The permittee must test any equipment scheduled for testing, unless otherwise stated in Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within (60) days of achieving maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing.	Initial and subsequent performance testing for the flare and engines have been performed.	The Gas to Energy Facility became operational on 11/22/10. The Initial Performance Test was conducted on 3/22-25/11 and 5/9-11/11. The most recent Engine Performance Test was conducted on 11/18/20 (SN-08). The test notification was submitted on 10/7/20 (SN-08).	Y
PWC-4	Area	n/a	n/a	The permittee must provide: a. Sampling ports adequate for applicable test methods; b. Safe sampling platforms; c. Safe access to sampling platforms; and d. Utilities for sampling and testing equipment.	Permittee will provide sample ports to conduct the performance test as required by PC-3. Platforms and utilities are not applicable to the design of an open candlestick flare.	The facility has the necessary equipment required to facilitate access for testing and sampling.	Y
PWC-5	Area	n/a	n/a	The permittee must operate the equipment, control apparatus, and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times.	Permittee will operate equipment in accordance with design limitations.	The equipment is designed and operated within its design limitations.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
PWC-6	Area	n/a	n/a	This permit subsumes and incorporates all previously issued air permits for this facility.	Comply	Comply	Y
PWC-7	Area	n/a	n/a	The facility's current Class I, Solid Waste Permit #0290-SI-R3, issued September 19, 2014 (with an effective date of October 1, 2014), permitted a maximum design capacity of 15,990,000 cubic yards (CY). The permittee shall weigh every incoming load of waste accepted by the facility on its truck scale. The permittee shall update its' air permit to reflect the new capacity in the event that a new Solid Waste Permit is issued that allows an increase in the total capacity of the landfill. [Regulation 19, §19.705, A.C.A. §8-4- 203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR §70.6]	The total solid waste disposed of in the landfill shall not exceed 15,990,000 yd ³ of solid waste during the lifetime of the landfill.	The total solid waste disposed of in the landfill is 14,183,254 yd ³ as of December 2020.	Y
PWC-8	Area	n/a	n/a	To demonstrate compliance with Plantwide Condition 7, the permittee shall update records of the total amount of waste-in-place in cubic yards annually. These records shall be updated by the 31 st day of March and shall be retained at least 5 years. [Reg.19.705 and Reg.18.1004, 40 CFR Part 52 Subpart E and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4- 311]	The total solid waste disposed of in the landfill shall not exceed 15,990,000 yd ³ of solid waste during the lifetime of the landfill.	The total solid waste disposed of in the landfill is 14,183,254 yd ³ as of December 2020. Records maintained onsite contain waste accepted for each month as well as a running total of the total amount of waste present in the landfill. Records are updated by March 31 st and will be made available to Department personnel upon request.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

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PWC-9	Area	n/a	n/a	The permittee is subject to and shall comply with 40 CFR Part 60 Subpart WWW - <i>Standards of Performance for Municipal Solid Waste Landfills</i> (Appendix A), since it has a design fill capacity in excess of 2,500,000 Mg and the facility was modified after May 30, 1991. The gas collection and control system will be subject to the monitoring requirements of 40 CFR 60, Subpart WWW - <i>Standards of Performance for Municipal Solid Waste Landfills</i> , 30 months (June 19, 2016) after the site specific NMOC emissions are reported to be equal to or greater than 50 Mg per year. [Regulation 19, § 19.304, 40 CFR §60.752, Subpart WWW, and §60.754(3)]	An active landfill gas collection system (GCCS) shall be operated in conformance with the provisions of 40 CFR Part 60 Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills once site specific NMOC emissions are reported to be equal to or greater than 50 Mg per year.	On November 18, 2013 – November 20, 2013 EVLF performed Tier 2 retesting at the facility. Based on a site- specific NMOC concentration of 364 ppmv as hexane, it was determined that the NMOC emission rate for EVL was 66.53 Mg/yr in 2013. This emission rate exceeds the 50 Mg/yr threshold of NSPS; therefore, EVLF will comply with NSPS Subpart WWW requirements contained in 40 CFR 60.752(b)(2).	Y
PWC-10	Area	n/a	n/a	The permittee shall be required to modify this permit before starting any modification, construction, or reconstruction at the facility not described in this permit. The permittee is allowed to install additional gas extraction wells and remove and/or replace existing gas extraction wells; any such modifications shall be documented and a record maintained on site and make available to Department personnel upon request. [Regulation 19, §19.304 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8- 4-311]	Any modifications shall be documented and a record maintained on site available to Department personnel upon request.	Comply	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

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PWC-11	Area	n/a	n/a	<p>The permittee shall maintain records of the following:</p> <ul style="list-style-type: none"> a. An up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector; and b. A readily accessible record of the nature, date of deposition, amount and location of asbestos-containing or non-degradable waste excluded from collection. 	Maintain records of an up-to-date plot map of each existing and planned collector in the system. and readily accessible records of the nature, date of deposition, amount and location of asbestos-containing or non-degradable waste excluded from collection.	A map that displays all existing gas collectors is maintained onsite. No areas are currently excluded from the overall GCCS design at this time.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

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PWC-12	Area	n/a	n/a	<p>Since the calculated Tier 2 NMOC emission rate is equal to or greater than the 50 Mg/yr threshold level, the permittee shall:</p> <p>a. Install a collection and control system that captures the gas generated within the landfill areas required by paragraphs 40 CFR 50.752(b)(2)(ii)(A) or (B) and ((b)(2)(iii) by June 19, 2016 (which is within 30 months after the first annual report in which the emission rate equals or exceeds 50 Mg/yr). [Reg.19.304 and 40 CFR 60.752]</p>	<p>If the calculated Tier 2 NMOC emission rate is greater than or equal to 50 Mg/yr, permittee must Submit a collection and control system design plan within 1 year and install a collection and control system within 30 months.</p>	<p>The NMOC emissions rate was calculated using the latest site-specific NMOC concentration (CNMOC) from the Tier 2 re-test performed on November 18, 2013 – November 20, 2013. The results of the 2013 Tier 2 re-test indicates the NMOC emission rate for 2013 is 66.53 Mg/yr. Since the NMOC Emission Rate exceeds the 50 Mg/yr threshold, in accordance with the requirements of 40 CFR 60.752(b)(2)(i), and the requirements of PWC-10, EVL prepared and submitted an NSPS GCCS Design Plan on November 7, 2014. Also, in accordance with the requirements of 40 CFR 60.752(b)(2)(ii) as specified in 40 CFR 60.755(b) and PWC-9, EVLF has expanded the GCCS, so that it covers all areas that meet the 2-year/5-year Rule of the NSPS no later than June 19, 2016.</p>	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

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PWC-13	Area	n/a	n/a	The GCCS Design plan may allow for alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions of 40 CFR 60.753 through 60.758 and the applicable operating parameters of this permit when approved by the administrator. Any approved alternatives in the current plan may be used when applicable under the terms of this permit. [Reg.19.304 and 40 CFR 60.752]	GCCS Design Plan with alternatives to operational standards, test methods, procedures, compliance measures, monitoring, record-keeping or reporting provisions of 40 CFR 60.753 through 60.758 and the applicable operating parameters of this permit when approved by the administrator.	The existing, approved NSPS GCCS Design Plan contains alternatives the operational standards, test methods, procedures, compliance measures, monitoring, record-keeping or reporting provisions of 40 CFR 60.753 through 60.758 and the applicable operating parameters of this permit when approved by the administrator.	Y
PWC-14	Area	n/a	n/a	The permittee has estimated uncontrolled NMOC emissions exceed 50 megagrams per year as calculated in accordance with 40 CFR 60.754. Therefore, the permittee will be subject to and shall comply with 40 CFR 63 Subpart AAAA – National Emission Standards for Hazardous Air Pollutants – Municipal Solid Waste Landfills on June 19, 2016. [Reg.19.304 and 40 CFR 63.1935(a)(3)]	Comply with 40 CFR 63, Subpart AAAA	The facility currently operates in accordance with the applicable requirements of 40 CFR 63, Subpart AAAA.	Y
PWC-15	Area	n/a	n/a	The permittee must comply with the requirements of 40 CFR 60 Subpart WWW [Reg.19.304 and 40 CFR 63.1955(a)(1)]	Comply with 40 CFR 60, Subpart WWW	The facility currently operates in accordance with the applicable requirements of 40 CFR 60, Subpart WWW.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

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PWC-16	Area	n/a	n/a	The permittee must comply with the requirements of 40 CFR 63.1960 through 63.1985 and with the general provisions of 40 CFR 63 as specified in Table 1 of 40 CFR 63 Subpart AAAA. [Reg.19.304 and 40 CFR 63.1955(b)]	Comply with 40 CFR 63.1960 through 63.1985 and with the general provisions of 40 CFR 63 as specified in Table 1 of 40 CFR 63 Subpart AAAA	The facility currently operates in compliance with 40 CFR 63.1960 through 63.1985 and with the general provisions of 40 CFR 63 as specified in Table 1 of 40 CFR 63 Subpart AAAA	Y
PWC-17	Area	n/a	n/a	Compliance with 40 CFR § 63 Subpart AAAA is determined in the same way it is determined for 40 CFR § 60 Subpart WWW, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence. In addition, continuous parameter monitoring data, collected under 40 CFR § 60.756(b)(1), (c)(1), and (d) of Subpart WWW, are used to demonstrate compliance with the operating conditions for control systems. If a deviation occurs, the permittee has AAAA and has deviated from the requirements of 40 CFR § 63 Subpart AAAA. The permittee must develop a written SSM plan according to the provisions in 40 CFR § 63.6(e)(3). A copy of the SSM plan must be maintained on site. Failure to write or maintain a copy of the SSM plan is a deviation from the requirements of 40 CFR 63 Subpart AAAA. [Feg.19.304 and 40 CFR §63.1965]	Comply with 40 CFR 63 Subpart AAAA	The facility currently operates in accordance with the requirements of 40 CFR 63, Subpart AAAA and has an SSM Plan located onsite that is available for review.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

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PWC-18	Area	n/a	n/a	<p>A deviation is defined in §60.1990. For the purposes of the landfill monitoring and SSM plan requirements, deviations include the items in paragraphs (a) through (c) of 40 CFR § 63.1975. [Reg.19.304 and 40 CFR § 63.1965]</p> <p>a. A deviation occurs when the control device operating parameter boundaries described in 40 CFR §60.758(c)(1) of subpart WWW are exceeded.</p> <p>b. A deviation occurs when 1 hour or more of the hours during the 3-hour block averaging period does not constitute a valid hour of data. A valid hour of data must have measured values for at least three 15-minute monitoring periods within the hour.</p> <p>c. A deviation occurs when a SSM plan is not developed or maintained on site.</p>	n/a	n/a. There are no enclosed combustors used as control devices onsite; therefore, this requirement does not apply.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

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PWC-19	Area	n/a	n/a	Averaged are calculated in the same way as they are calculated in 40 CFR part 60, subpart WWW, except that the data collected during the events listed in paragraphs (a), (b), (c), and (d) of this section are not to be included in any average computed under this subpart: a. Monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments. b. Startups. c. Shutdowns. d. Malfunctions. [Reg.19.304 and 40 CFR § 63.1965]	n/a	n/a. There are no enclosed combustors used as control devices onsite; therefore, this requirement does not apply.	Y
PWC-20	Area	n/a	n/a	The permittee must keep records and reports as specified in 40 CFR § 60 Subpart WWW, with one exception: The permittee must submit the annual report described in 40 CFR § 60.757(f) every 6 months. [Reg.19.304 and 40 CFR §63.1980(a)]	Records/Reports	The facility maintains records of all required data onsite for at least 5 years. All reports required by the NSPS are submitted semi-annually as specified in 40 CFR 63.1980(a).	Y
PWC-21	Area	n/a	n/a	The permittee must also keep records and reports as specified in the general provisions of 40 CFR § 60 and of 40 CFR § 63 as shown in Table 1 of 40 CFR § 63 Subpart AAAA. Applicable records in the general provisions include items such as SSM plans and the SSM plan reports. [Reg.19.304 and 40 CFR §63.1980(b)]	Records	The facility maintains records of all required data onsite for at least 5 years.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

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PWC-22	Area	n/a	n/a	The permittee must prepare and implement a Startup, Shutdown, and Malfunction Plan (SSM). If the Department requests a review of the SSM, the permittee will make the SSM available for review. The permittee must keep a copy of the SSM at the source's location and retain all previous versions of the SSM plan for five years. [Reg.19.304 and 40 CFR §63.6(e)(3)]	Comply	An SSM plan was developed and implemented on 6/19/16. A copy of the SSM is located at the facility and is available for review upon request. All previous versions of the plan will be maintained onsite for at least 5 years.	Y
PWC-23	Area	n/a	n/a	The permittee is subject to and shall comply with Regulation 21, Section 11.2 Standards for Waste Disposal. [Regulation 21, Section 11.2(A-D), and 40 CFR §60.752]	Comply	Comply	Y
PWC-24	Area	n/a	n/a	The permittee of an active waste disposal site that received asbestos-containing waste material from a source covered by Regulation 21 shall meet the following requirements:..... [Regulation 21, Section 11.2(A)(i-ii)]	Comply	All waste is covered with 6-inches of cover soil at the end of each working day, or the area is covered with tarps as approved by ADEQ.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

Facility Name: Eco-Vista, LLC **AFIN:** 72 - 00144 **Permit:** 1884-AOP-R6 **Period:** 01/01/2021 through 01/10/2021

(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
PWC-25	Area	n/a	n/a	The permittee shall maintain waste shipment records (WSR) of all asbestos-containing waste material received: [Regulation 19, §19.705 and Regulation 21, Section 11.2(B)(i-vii)] Maintain waste shipment records (WSR), using a form with the following information:...	Records	Asbestos manifests are kept on file for at least 2 years. Records are checked for accuracy and modified within 15 days, if necessary. A copy of the signed records are sent to the generator within 30 days. Daily GPS coordinates are recorded for ACM locations.	Y
PWC-26	Area	n/a	n/a	The permittee shall notify the Department in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at the waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the Department at least 10 working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. The following information shall be included in the notice: [Regulation 21, Section 11.2(C)(i-iv)]	Notification	A 45-Day NESHAP letter was submitted to the ADEQ on 3/30/20.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

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PWC-27	Area	n/a	n/a	Within 60 days of a site becoming inactive, the permittee shall record a notation, in accordance with Arkansas State law, on the deed to the facility property and on any other instrument that would normally be examined during a title search. This notation will in perpetuity notify any potential purchaser of the property that in accordance with (a) & (b)	Comply	n/a	Y
PWC-28	Area	n/a	n/a	The permittee must comply with the standards for labeling of products using ozone-depleting substances as specified in (a) – (d)	Comply	This permit condition does not apply as of December 31, 2020	Y
PWC-29	Area	n/a	n/a	The permittee must comply with the standards for recycling and emissions reduction as specified in (a)-(f), except as provided for MVACs in Subpart B.	Comply	This permit condition does not apply as of December 31, 2020	Y
PWC-30	Area	n/a	n/a	If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.	Comply	This permit condition does not apply as of December 31, 2020	Y
PWC-31	Area	n/a	n/a	If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.	Comply	This permit condition does not apply as of December 31, 2020	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

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PWC-32	Area	n/a	n/a	The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC 22 refrigerant.	Comply	This permit condition does not apply as of December 31, 2020	Y
PWC-33	Area	n/a	n/a	The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.	Comply	This permit condition does not apply as of December 31, 2020	Y
GP-1	n/a	n/a	n/a	The permittee is subject to any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute [40 CFR 70.6(b)(2)]	Compliance with General Provision 1 is determined by compliance with the facility Title V Operating Permit.	Facility has and is complying with the terms of this permit.	Y
GP-2	n/a	n/a	n/a	This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(b)(2) and §26.701(B)	Current Operating Air Permit was issued on 5/18/2016 and expires on 2/11/2020	A timely Title V Renewal was submitted and has been approved. The Title V Renewal became effective on 1/11/2021 (1884-AOP-R7)	Y

Revised
10/15/2008

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GP-3	n/a	n/a	n/a	The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. [Regulation 26, §26.406]	Submit a permit renewal application at least six (6) months before permit expiration.	A timely Title V Renewal will be submitted when required.	Y
GP-4	n/a	n/a	n/a	Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]	No emission limits or operating conditions are specifically applicable to General Provision 4 as of the date of this report.	No emission limits or operating conditions are specifically applicable to General Provision 4 as of the date of this report.	Y
GP-5	n/a	n/a	n/a	The permittee must maintain records of monitoring information to meet requirements specified in (a)-(f)	Facility maintains records and reports as required by Title V Operating Permit.	WM Records and reports are maintained on-site or will be available within four hours for a minimum of 5-years.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

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(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
GP-6	n/a	n/a	n/a	The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]	Retain Records for 5 years from the date of monitoring sample, measurement, report, or application.	The facility retains records for a minimum of 5 years from the date of monitoring sample, measurement, report, or application.	Y

Revised
10/15/2008

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GP-7	n/a	n/a	n/a	The permittee must submit reports of all required monitoring every six (6) months. If the permit establishes no other reporting period, the reporting period shall end on the last day of the month six months after the issuance of the initial Title V permit and every six months thereafter. The report is due on the first day of the second month after the end of the reporting period. The first report due after issuance of the initial Title V permit shall contain six months of data and each report thereafter shall contain 12 months of data. The report shall contain data for all monitoring requirements in effect during the reporting period. If a monitoring requirement is not in effect for the entire reporting period, only those months of data in which the monitoring requirement was in effect are required to be reported. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports.	Submit Semi-Annual Reports on the first day of the second month after the end of the reporting period.	Facility semi-annual Title V Reports are submitted to ADEQ as required by permit condition GP-7.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

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GP-8	n/a	n/a	n/a	The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. For all upset conditions (as defined in Regulation 19, § 19.601) the permittee will make an initial report to the department by the next business day in accordance with (i-ix) and provide a written report within five (5) business days of discovery of the occurrence...provide additional detail in accordance with General Provision 8 and include in GP-7 & GP-21 reports.	Any deviation from the permit requirements requires the permittee to submit an initial report the next business day after the discovery of the occurrence. The initial report may be made by telephone. A full report from the permittee is required within 5 days of the discovery of the occurrence.	n/a	Y
GP-9	n/a	n/a	n/a	If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provision or applications hereof which can be given effect without the invalid provisions or applications, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]	n/a	n/a	Y
GP-10	n/a	n/a	n/a	The permittee must comply with all conditions of this Part 70 Permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]	No emission limits or operating conditions are specifically applicable to General Provision 10 as of the date of this report.	No emission limits or operating conditions are specifically applicable to General Provision 10 as of the date of this report.	Y

Revised
10/15/2008

Arkansas Air Operating Permits Annual Compliance Certification Form (Part 2)

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(1) Permit Condition Reference	(2) Source No.	(3) Source Description	(4) Pollutant	(5) Monitoring Method (Rule Citation)	(6) Permitted Emission Limit or Operating Condition	(7) Actual Emissions or Operating Conditions	(8) Continuous Compliance ? (Y or N)
GP-11	n/a	n/a	n/a	It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, 26.701(F)(2)]	No emission limits or operating conditions are specifically applicable to General Provision 11 as of the date of this report.	No emission limits or operating conditions are specifically applicable to General Provision 11 as of the date of this report.	Y
GP-12	n/a	n/a	n/a	The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause.....[40 CFR 70.6(a)(6)(iii) and Regulation 26, § 26.701(F)(3)]	n/a	n/a	Y
GP-13	n/a	n/a	n/a	This permit does not convey any property rights of any sort, or any exclusive privilege. [40CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)((4)]	n/a	n/a	Y
GP-14	n/a	n/a	n/a	The permittee must furnish to the Director , within the time specified by the director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.....[40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]	n/a	n/a	Y
GP-15	n/a	n/a	n/a	The permittee must pay all permit fees in accordance with the procedures established in Regulation 9.[40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]	Permittee will comply with General Provision 15 by paying permit fees annually.	Facility pays permit fees annually upon receiving annual invoices from ADEQ.	Y

Revised
10/15/2008

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GP-16	n/a	n/a	n/a	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in the permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(1)(1)]	n/a	n/a	Y
GP-17	n/a	n/a	n/a	If the permit allows different operating scenarios, the permittee shall contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(1)(1)]	Record in a log a record of the operational scenario.	A record of the engine/flare operating scenarios is recorded and maintained in site files.	Y
GP-18	n/a	n/a	n/a	The administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B).]	No emission limits or operating conditions are specifically applicable to General Provision 18 as of the date of this report.	No emission limits or operating conditions are specifically applicable to General Provision 18 as of the date of this report.	Y
GP-19	n/a	n/a	n/a	Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(C)(1) and Regulation 26, §26.703(A)]	Reports required to be submitted with responsible official (RO) signature.	Documents are signed by a responsible official or his/her designee as required by this permit.	Y

Revised
10/15/2008

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GP-20	n/a	n/a	n/a	The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following specific to (a-c) [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]	Allow ADEQ personnel on-site.	Facility allows ADEQ personnel on-site in accordance with GP-20. ADEQ regularly conducts routine inspections at the facility.	Y
GP-21	n/a	n/a	n/a	The permittee shall submit a compliance certification annually to the Administrator as well as the Department. [40 CFR 70.6(C)(5) and Regulation 26, §26.703(E)(3)]	Submit Annual Compliance Certification within 30 days following the last day of the anniversary month of the initial Title V Permit.	This ACC has been submitted in accordance with this requirement.	Y
GP-22	n/a	n/a	n/a	Nothing in this permit will alter or affect the following outlined in sections (a)-(d) : [Regulation 26, §26.704(C)]	No emission limits or operating conditions are specifically applicable to General Provision 22 as of the date of this report.	No emission limits or operating conditions are specifically applicable to General Provision 22 as of the date of this report.	Y
GP-23	n/a	n/a	n/a	This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]	Permittee will comply with General Provision 23 having on-site emission sources as permitted in the Title V Permit.	Facility landfill emission sources are as permitted in the Title V Permit.	Y
GP-24	n/a	n/a	n/a	The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit specific to (a)-(c)	Request any deadline extensions at least 15-days in advance.	No extensions requested during reporting period.	Y

Revised
10/15/2008

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GP-25	n/a	n/a	n/a	The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such.	Request in writing at least 30-days in advance for any temporary emissions that could exceed an emission rate.	No emission rates were exceeded during reporting period.	Y
GP-26	n/a	n/a	n/a	The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval.	No emission limits or operating conditions are specifically applicable to General Provision 26 as of the date of this report.	No emission limits or operating conditions are specifically applicable to General Provision 26 as of the date of this report.	Y

Permit Condition Reference: SC-Specific Condition, PC-Plantwide Condition, GP-General Provision

Rule Citation:

Continuous Compliance?:

Cite rule/regulation (NSPS subpart, NESHAP subpart, etc...) if provided in your permit condition.
Yes or (#) of individual deviations and upset conditions. See Part 3

Revised
10/15/2008

Arkansas Air Operating Permit Annual Compliance Certification Form

Air Operating Permit Number: 1884-AOP-R6 AFIN: 72-00144

Company Name: Waste Management

Period: 1/1/2021 Through 1/10/2021

(Part 3)

Deviation and Excess Emission Reporting	
Question	Response (Yes/No)
Are there any deviations or upset conditions being reported with this annual compliance certification? If yes complete the table entitled Deviation and Upset Condition Summary Report@ (Part 4).	No
Have there been any previous deviations or upset condition reports forwarded to ADEQ during this reporting period? If yes, attach a copy of the report(s) and complete (Part 4).	No

Reporting of upset conditions is only required when the source exceeds the emission limit established by the permit, for longer than thirty (30) minutes, in the aggregate, during a twenty-four hour period.

All deviations must be reported on the Annual Compliance Certification.