

SEMI – ANNUAL COMPLIANCE CERTIFICATION

October 1, 2018 through March 31, 2019



For

Permit No. 64381

**COCHISE COUNTY WESTERN REGIONAL LANDFILL
(CCWRL)**

2595 N. Sagebrush Road

Huachuca City, Arizona 85616

Martin D. Haverty
Director

Telephone: (520) 803-3770
Fax: (520) 803-3798



COCHISE COUNTY
Department of Solid Waste
2595 North Sagebrush Road
Huachuca City, Arizona 85616

May 15, 2019

Mr. Timothy Franquist Jr.,
Technical Services & Enforcement Unit Manager
Arizona Department of Environmental Quality
Air Quality Division
1110 West Washington Street
Phoenix, AZ 85007

Subject: Semi-Annual Compliance Certification for Reporting Period: October 1, 2018 through March 31, 2019 (Permit No. 64381).

Dear Mr. Franquist:

Cochise County Solid Waste Department (CCSWD) is pleased to present the Semi-Annual Compliance Report for Cochise County Western Regional Landfill (CCWRL) pursuant to permit number 64381 issued on December 30, 2016.

The compliance report includes two attachments – Attachment A: Certification of Truth, Accuracy and Completeness and Attachment B: Semi-Annual Compliance Certification Table. The enclosed certification report was compiled using the guidance provided by the U.S. Environmental Protection Agency under 40 CFR, Part 71.

If you have any questions or concern, please contact me at 520-803-3783.

Sincerely,

A handwritten signature in black ink that reads "Mohd R. Hasan".

Mohd R. Hasan "Hasan"
Environmental Compliance & Safety Engineer
E-mail: mhasan@cochise.az.gov

Attachments:

Attachment A: Certification of Truth, Accuracy and Completeness
Attachment B: Semi-Annual Compliance Certification Table.

Cc: Director, EPA Region IX

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Attachment A

Certification of Truth, Accuracy and Completeness

**Semi-Annual Compliance Certification
Certification of Truth, Accuracy and Completeness**

I. General Information

Facility Name: Cochise County Western Regional Landfill
Mailing Address: 2595 N. Sagebrush Road
Huachuca City, AZ 85616

Permit Number: 64381

Contact Person: Marty Haverty
Telephone: (520) 803-3770

Reporting Period: October 1, 2018 – March 31, 2019

II. Certification of Truth, Accuracy and Completeness

Responsible Official: Marty Haverty Title: Director
Solid Waste Department

Mailing Address: 2595 N. Sagebrush Road
Huachuca City, AZ 85616

Telephone: (520) 803-3770

Certification:

I Certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed)  _____

Name (printed or typed) Martin D. Haverty Date: 05/15/2019

Attachment B

Semi-Annual Compliance Certification Table

SEMI-ANNUAL COMPLIANCE CERTIFICATION

Facility: Cochise County Western Regional Landfill (CCWRL) Permit Number: 64381
 under Cochise County Solid Waste Department (CCSWD)

Permit Issuance Date: December 30, 2016

Certification Period: October 1, 2018 through March 31, 2019

Attachment "A" General Provisions

Permit Citation and Condition	Compliance Status	Method Used to Determine Compliance/Comments
I. Permit Expiration and Renewal	Continuous	Permit # 64381 will expire on December 30, 2021. CCSWD will apply for renewal of the permit in due time with in at least 6 months, but not more than 18 months prior to the date of expiration.
II. Compliance with Permit Conditions	Continuous	CCWRL complies with all criteria specified in Attachments "A" and "B" of the permit.
III. Permit Revision	N/A	N/A
IV. Posting of Permit	Continuous	Two copies of the permit are posted onsite at two different locations which are clearly visible and accessible.
V. Fee Payment	Continuous	All fees required by the permit or applicable rules and regulations have been and will be paid by CCSWD.
VI. Annual Emission Inventory Questionnaire	Continuous	CCWRL has been submitting annual emissions inventory questionnaire since the beginning of the requirement for it. CCWRL submitted annual emission inventory questionnaire for the year 2018 to ADEQ in May 2019.
VII. Compliance Certification	Continuous	CCWRL submits compliance certification twice a year as specified in the permit. The compliance certification includes the items specified in Attachment "A" Section VII.
VIII. Certification of Truth, Accuracy and Completeness	Continuous	All documents submitted for the permit are certified by a responsible official of Cochise County.
IX. Inspection and Entry	Continuous	CCWRL grants access to ADEQ to enter the site premises, inspect equipment and site operations, sample or monitor emissions. ADEQ has

Permit Citation and Condition	Compliance Status	Method Used to Determine Compliance/Comments
		access to and copy permit related records, and record any inspection conducted at CCWRL.
X. Permit Revision Pursuant to Federal Hazardous Air Pollutant Standard.	Continuous	CCWRL will submit an application for a permit revision, if CCWRL is subject to standard promulgated by the Administrator at any point.
XI. Accidental Release Program	Continuous	If CCWRL becomes subject to provision of 40 CFR Part 68 at any point, then CCWRL will comply with the provisions according to the time-lines specified.
XII. Excess Emissions, Permit Deviations, and Emergency Reporting.	Continuous	CCWRL will report any excess emissions to ADEQ by telephone or facsimile within 24 hours, and in writing within 72 hours. The excess emissions report will include all criteria specified in Attachment "A" Section XII.A.1.b. CCWRL will also promptly report any deviations from the permit requirements or site emergencies.
XIII. Record Keeping Requirements	Continuous	CCWRL keeps records of all monitoring items specified in Attachment "A" Section XIII for a minimum of five years.
XIV. Reporting Requirements	Continuous	CCWRL submits compliance certification twice a year by the dates specified in the permit. The compliance certifications include the items specified in Attachment "A" Section VII. Excess emissions, permit deviations, and emergency reports will be submitted to ADEQ as specified in Attachments 'A', Section XII. A. 1. b.
XV. Duty to provide Information	Continuous	CCWRL will promptly submit information requested by ADEQ regarding issues related to the permit.
XVI. Permit Amendment or revision	Continuous	This provision is either a general rule applied to all regulated sources or is administrative in nature and does not warrant a compliance demonstration.
XVII. Facility Change Without Permit Revision	Continuous	CCWRL may make changes to the permitted source without a permit revision, only if the changes follow the specifications of Attachments "A" Section XVII. The changes will be reported to ADEQ a minimum of 7 working days before the changes are performed. The reporting requirements specified in Attachment "A" Section XVII will be followed.
XVIII. Testing Requirements	Continuous	CCWRL is currently not subject to Performance Testing Requirements.
XIX. Property rights	Continuous	This provision is either general rule applied to all regulated sources or is administrative in nature and does not warrant a compliance demonstration.
XX. Severability Clause	Continuous	This provision is either a general rule applied to all regulated source or is administrative in nature and does not warrant a compliance demonstration.

Permit Citation and Condition	Compliance Status	Method Used to Determine Compliance/Comments
XXI. Permit Shield	Continuous	CCWRL complies with the conditions of the permit and the regulations specified in the portions of this permit subtitled "Permit Shield".
XXII. Protection of Stratospheric Ozone	Continuous	CCWRL will comply with the provisions if the source becomes subject to provisions of 40 CFR Part 82.

Attachment "B": Specific Conditions

Permit Citation and Condition	Compliance Status	Method Used to Determine Compliance/Comments
I. Facility-wide Requirements	Continuous	Presently CCWRL has 3 (three) on-site staffs certified in EPA Reference Method 9. CCWRL submitted reports (such as visual emission observation) of all monitoring and recordkeeping activities during the specified periods.
II. Landfill Requirements {Non- methane Organic Compounds (NMOC)}	Continuous	CCWRL has been submitting reports on non-methane organic compounds (NMOC) since the beginning of the requirement for it. CCWRL submitted report on NMOC for the year 2018 to ADEQ in May 2019. Based on calculations using the site specific NMOC concentration (C _{NMOC}) value for WRL, the calculated NMOC emission rate for 2018 was 13.91 Mg/year.
III. Asbestos	N/A	Not applicable for the reason that, CCWRL does not accept asbestos contaminated materials.
IV. Internal Combustion Engine Requirements	Continuous	CCWRL does not allow the diesel generator to emit smoke or dust exceeding 40% opacity. The fuel used is ultra-low sulfur diesel (15 ppm or less). CCWRL performs visual emission observation utilizing personnel certified with EPA Reference Method 9.
V. Fugitive Dust Sources	Continuous	CCWRL does not allow visible emission from any non-point source to create an opacity value greater than 40%. CCWRL does not allow the transportation of materials or cleaning of any site or roadway which is likely to give rise to airborne dust without taking responsible precautions. CCWRL has been conducting bi-weekly visual surveys of visible emissions from non-point sources in accordance with the observation plan during this period.

Permit Citation and Condition	Compliance Status	Method Used to Determine Compliance/Comments
VI. Mobile Source Requirements	Continuous	CCWRL does not allow mobile sources to emit smoke or dust which exceeds 40% opacity. CCWRL retains records of mobile source maintenance activities.
VII. Other Periodic Activities	Continuous	No abrasive blasting, spray painting or demolition/renovation was performed during the period covered under this semi-annual certification. In addition, CCWRL continues to comply with 40 CFR Part 82, Subpart F when onsite heating /or cooling equipment that uses closed-cycle refrigeration is serviced. Only certified employees perform servicing.

