CR Group, LLC – Tekoi Landfill
On-Site Full Compliance Evaluation (FCE)

Inspection Date:	June 17, 2025
Inspection Report Date:	August 26, 2025
EPA Representatives:	Katelyn Bergl, Environmental Engineer, US EPA Region 8
Company Representatives:	Mark Franc Brian Dodek Ben Smith
Inspection Report Prepared By:	Katelyn Bergl, Air and Toxics Enforcement Branch, US EPA Region 8
Inspection Report Reviewed By:	Scott Patefield, Branch Manager, Air and Toxics Enforcement Branch, US EPA Region 8 SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD Date: 2025.09.02 15:54:19 -06'00'
Last Inspection:	August 15, 2023
Operating Status:	Operating[1]
Applicable Requirements:	Title V; 40 CFR Part 60 New Source Performance Standards, Subpart WWW (NSPS WWW) and Subpart JJJJ (NSPS JJJJ); 40 CFR Part 63 National Emissions Standards for Hazardous Pollutants, Subpart AAAA (MACT AAAA) and Subpart ZZZZ (MACT ZZZZ); 40 CFR Part 62, Subpart OOO[2]

Permit Number: V-SV-000001-2021.00
Replaces Permit No.: V-SV-000001-2016.00

Issue Date: April 13, 2022
Effective Date: May 13, 2022
Expiration Date: May 13, 2027

Part 71 Permitting History

Date of Action	Permit Number	Type of Action	Description of Action
September 22, 2011	V-SV-00001-2010.00	Initial Permit	
November 14, 2016	V-SV-000001-2016.00	First Permit Renewal	
May 13, 2022	V-SV-000001-2021.00	Second Permit Renewal	Replaced previously applicable requirements under New Source Performance Standards at 40 CFR part 60, subpart WWW with newly applicable requirements under 40 CFR part 62, subpart OOO, effective June 21, 2021, and incorporated changes from amendments to the landfill National Emissions Standards for Hazardous Air Pollutants at 40 CFR part 63, subpart AAAA, effective September 27, 2021.

[1] On June 16, 2025, Waste Management sent EPA a letter signed by Mr. Steven (Cody) Myers to notify the EPA that Tekoi Landfill had ceased accepting waste on May 23, 2025, and that Waste Management had been working with the Skull Valley Band of Goshutes to transition to "Post Closure Operations" in July 2025. As of the date of this report, Tekoi Landfill had not rescinded, and is still subject to, Permit No. V-SV-000001-2021.00.

[2] Effective June 21, 2021, Tekoi Landfill became subject to 40 CFR Part 62, Subpart OOO (Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014). [86 FR 27770] Prior to that date, the landfill was subject to the requirements of NSPS WWW.

Facility Information and Emission Unit Identification

Facility Owner Name:	Skull Valley Band of Goshute Indians
Facility Operator Name:	CR Group, LLC
Parent Company Name:	Waste Management of Utah, Inc.
Mailing Address:	6976 West California Avenue, Salt Lake City, Utah 84104
Facility Contact:	Ben Smith, Landfill Operations Manager, Waste Management of Utah, Inc.
Facility Location:	Latitude 40.358323, Longitude -112.724416 Section 18, Township 5 South, Range 8 West
County, State:	Tooele, Utah
Reservation:	Skull Valley Band of Goshute Indian Community
Tribe:	Skull Valley Band of Goshute Indians of Utah
Responsible Official:	Steven (Cody) Myers, District Manager, Waste Management of Utah, Inc.
SIC Code:	4953 – Refuse Systems
AFS ID:	49-045-00088
Other CAA Permits:	There are no other CAA permits for this facility.

Enforcement History

None in the past five years.

Inspection Findings/Areas of Concern

Based on the information reviewed to date, EPA has noted no areas of concern at this time. However, it should be noted that this inspection report is not a final determination of compliance.

Compliance Assistance

As a result of this full compliance evaluation, it was noted that Tekoi landfill has recently ceased waste acceptance and has begun closure activities at the landfill. The EPA inspector provided assistance to Waste Management to coordinate the landfill closure and future permit recission with EPA Region 8's Permitting and Modeling Section of the Air and Radiation Division.

Description of Operations

The Tekoi Landfill, which is owned by the Skull Valley Band of Goshute Indians of Utah (Tribe) and operated by CR Group, LLC (CR), a wholly owned subsidiary of Waste Management of Utah, Inc., serves as a regional municipal solid waste (MSW) and construction and demolition (C&D) debris disposal facility. Construction of the Tekoi Landfill began in December 2004, and the landfill has been in operation since 2005.

No hazardous wastes, including asbestos, or infectious wastes are accepted for disposal, nor is the incineration of waste permitted. At the time of its permit application, the Tekoi Landfill accepted approximately 750 tons of waste per day (tpd); however, it is permitted to accept a maximum of 4,000 tpd. From January through April 2025, Tekoi Landfill accepted approximately 430 tpd. Beginning in May 2025, the landfill began to decrease waste acceptance in order to begin closure activities. The last day Tekoi Landfill accepted waste was May 23, 2025.

Tekoi Landfill is comprised of a 6-phase MSW disposal area, as well as two C&D disposal areas. The MSW portion of the landfill was operated as a balefill landfill until November 2010. A balefill is a type of landfill in which MSW is mechanically baled before being placed in the MSW disposal area. Tekoi Landfill has not conducted balefill operations since 2010. After 2010, the site accepted only loose (unbaled) MSW. The method of disposal has no effect on landfill emissions.

See Appendix A, Figures 1 and 2, for site overview images and maps.

General Inspection Observations and Commentary

EPA conducted a full compliance evaluation (FCE) inspection (EPA Inspection) of Tekoi Landfill on June 17, 2025. The inspector arrived at the facility at 9:30 AM. Mr. Marc Frank, Mr. Brian Dodek, and Mr. Ben Smith of Waste Management (collectively, "Waste Management") attended the EPA Inspection. Mr. Daniel Moon and Mr. Kyle Craig Bear, leadership of the Skull Valley Band of Goshute Indian Tribe, were notified of the inspection on June 11, 2025, but did not attend the EPA Inspection.

An opening conference was held at 9:30 AM. During the opening conference, current operations, operational changes, and compliance concerns were discussed.

Waste Management indicated that at the time of the EPA Inspection, waste acceptance at the facility had almost ceased entirely, and that work on the final cover of the existing landfill footprint had begun and was ongoing. EPA confirmed waste acceptance cessation through records provided by Mr. Brian Dodek on June 26, 2025 (Inspection Records). The Inspection Records indicate that prior to cessation of waste acceptance, in 2023 and 2024 Waste Management accepted approximately 200,000 tons/year of waste, equivalent to approximately 550 tons per day. In 2025 through the date of the inspection, the facility had accepted 54,523.12 tons of waste, equivalent to approximately 380 tons per day. During the month of May 2025, the facility accepted no more than 262 tons per day, and records indicate that May 23, 2025, was the last day the facility accepted any waste. The facility is permitted to accept up to 4,000 tons per day of waste.

Information and documentation related to compliance with the facility's Title V permit and other applicable regulations (i.e. NSPS WWW, Federal Plan OOO, MACT AAAA, MACT ZZZZ, NSPS JJJJ) were also requested during the opening conference and provided via email from Mr. Dodek as part of the Inspection Records.

Following the opening conference, a facility walk through was conducted. Waste Management indicated that as part of closure operations, engine Unit E3 and Unit E4 of the facility's permit had been removed on June 12, 2025. The EPA inspector, who is familiar with the previous locations of engine Units E3 and E4, verified that the engines were no longer in their previous locations and were not observed at any other location on site. Insignificant emission Unit IE3, a 13 hp Honda engine water pump, was observed to still be onsite and was being used to pump water for dust mitigation to support closure operations. Waste Management indicated Unit IE3 would be removed on or before July 7, 2025, due to the landfill closure. An additional unpermitted insignificant emission unit engine, a Wacker-Neuson 7.1 hp water pump, was also observed onsite during the inspection. Waste Management indicated that this additional unit is a temporary unit brought to the facility by a third-party contractor, BHI, assisting with closure operations. Waste Management stated that the additional engine was brought to the facility no earlier than April 2025, and that the additional engine will be removed once cover closure activities and associated dust mitigation requirements are completed. Each of the onsite engines (Units IE3 and the Wacker-Neuson unit) were inspected, including recording equipment specifications on the engine nameplates and current hours on the engine hour meters, if available. No additional engines or unpermitted emission units were observed to be present at the facility.

Waste Management confirmed that none of the engines have, or had prior to removal, emission controls. Waste Management maintains a "Preventive Maintenance Inspection Checklist" for the facility's engines and completes level "C" (250 hour or 180 day service), "D" (500 hour or 365 day service), or "E" (1,000 hour or 365 day service) maintenance tasks per the schedule prescribed in the checklist or per the engine maintenance manual, which also meets the applicable requirements of the Title V permit, Engine maintenance manuals, MACT ZZZZ, and NSPS JJJJ.

The landfilling areas were also inspected during the facility walk through. Waste Management indicated that fugitive dust had increased due to the increase in landfill footprint undergoing cover operations (Facility Emission Point E2, Fugitive Dust Emissions). The second water pump was brought onsite by BHI to provide additional water pumping capacity so that water trucks can be filled quicker to manage the increase in site activity and associated dust. Under typical landfill operations prior to landfill closure operations, Waste Management dispatched 4-5 truckloads of water per day to manage the dust emissions.

Uncovered waste outside of the active filling area was observed. Waste Management indicated that through the course of intermediate and final cover operations, loose waste from all areas of the site was being consolidated into central, uncovered areas. Once all areas of the landfill have been cleaned and covered, these final consolidation areas will undergo intermediate and final cover operations.

Waste Management indicated that the facility has 6 phases of the landfill for MSW landfilling, and that landfilling operations moved from the phases in the East to the phases in the West prior to cessation of waste acceptance. Phase 1 was constructed and landfilled with balefilling operations. When the facility moved into Phase 2, it began traditional filling thereafter. According to Waste Management, the facility has 2 C&D cells; One is empty and one is currently under final cover, although Waste Management reports that it also comingled C&D waste into the MSW cells of the landfill prior to May 23, 2025. At the time of the inspection, landfilling operations were most recently located centrally (east-to-west axis) in the northern-most cell, where the facility had been operating since 2023.

Waste Management indicated that landfill gas (LFG) emissions have been and are currently uncontrolled. Landfill gas nonmethane organic compound (NMOC) emissions are currently below 34 megagrams per year (Mg/yr), therefore capture via a gas collection and control system (GCCS) is not currently required and will not be required if no additional waste is accepted at the facility.

Waste Management indicated that the current landfill lease from the Tribe expires July 7, 2025. Although Waste Management is ceasing landfill operations and their lease with the Tribe has expired, Waste Management will remain responsible for environmental compliance related to the closure for 30 years. Waste Management has contracted with BHI, a third-party that is and will continue to execute closure operations for which Waste Management is responsible. Once initial closure is complete, including competing final cover of the landfill, Waste Management will work with EPA Region 8's permitting group to formally rescind the facility's Title V Permit.

The Tribe will continue to own the site after July 7, 2025, although the future use of the property is currently unknown.

Potential to Emit (PTE)

Pursuant to 40 CFR § 52.21, potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable.

The Tekoi Landfill does not currently have a GCCS for LFG emissions. On May 21, 2021, the EPA published a Federal Plan to implement the emissions guidelines (EG) for existing MSW landfills at 40 CFR part 60, subpart Cf on federal lands. This new EG rule replaced the former rule under NSPS Subpart WWW and went into effect on June 21, 2021. The Federal Plan and its implementing regulations are published under 40 C.F.R. Part 62, Subpart OOO (Federal Plan OOO). Under the Federal Plan OOO, landfill owners/operators are required to install a GCCS when the landfill design capacity is greater than 2.5 million megagrams (Mg) by mass or 2.5 million cubic meters by volume (MMm^3v) and the NMOC emission rate is greater than 34 Mg/yr. Tekoi

Landfill has a design capacity of approximately 45 MMm^3v for MSW disposal. As required by NSPS WWW, an initial design capacity report was submitted to the EPA on March 31, 2008, and an NMOC emission rate for the landfill was calculated using the procedures specified in 40 CFR § 60.754. The calculated annual NMOC emission rate was determined using the EPA's Landfill Gas Emissions Model (*LandGEM [Version 3.02]*). The annual rate was projected to exceed 50 Mg/yr, triggering the additional requirements specified in 40 CFR § 60.752(b)(2) as of March 10, 2008, the date the annual rate report was submitted.

Tier 2 field sampling activities, as allowed under NSPS WWW and Federal Plan OOO, were initially conducted in June 2008. The report concluded the estimated annual NMOC emission rate would exceed 50 Mg/yr in 2009. Subsequent Tier 2 testing was conducted at the site in 2009, 2013, 2018, and 2023. The results were submitted to the EPA in reports received 2009, January 2014, April 2018, and March 2023, respectively. The 2014 Tier 2 NMOC concentration of 965 parts per million by volume (ppmv) of hexane was the highest result of the three most recent Tier 2 tests and was used to calculate annual NMOC emission rates, which were determined to be less than 50 Mg/yr for the 5-year period from 2013 through 2017. This 2014 Tier 2 NMOC concentration value was used in the 2022 Title V permit application for emission calculations. Per NSPS WWW, this Tier 2 concentration is valid for up to 5 years; as such, additional Tier 2 testing was required in 2018 and 2023. Results of the 2018 Tier 2 test were discussed in EPA's 2020 inspection report; 2023 Tier 2 testing results are discussed in Section III.B. of this report.

The March 2023 NMOC report showed NMOC emissions to be 31 Mg/yr in 2028. Therefore, Tekoi Landfill will still be under the NMOC emissions threshold of 34 Mg/yr through 2028, the end of the 5-year period covered by 2023 NMOC report. If, in the future, the calculated NMOC emission rate equals or exceeds 34 Mg/yr, Tekoi Landfill will be required to submit a GCCS design plan signed by a professional engineer within one year and install a GCCS that captures the gas generated within the landfill within 30 months after the first annual report in which the emission rate equals or exceeds 34 Mg/yr. Tekoi Landfill shall comply with these requirements when NMOC emissions exceed 34 Mg/yr using Tier 2 methods, unless Tier 3 or Tier 4 studies can demonstrate that the GCCS requirements are not triggered. Fugitive PTE related to LFG will decrease considerably after a GCCS is installed.

The year in which NMOC emissions were likely to first exceed 34 Mg/year would have been 2031 based on expected growth calculations provided in the 2023 NMOC report, which did not account for closure in 2025. Based on that projection, a GCCS would have been required to go online within 30 months of that date or by approximately 2033. Under that scenario, 2032 is expected to be the last year when LFG emissions would be completely uncontrolled under the NSPS/EG scenario. The LFG generation rate for 2032 was used in the PTE emission calculations as a worst-case scenario for the 2022 Title V Permit. If no additional waste is accepted past May 23, 2025, the NMOC emissions will no longer increase, and no GCCS will be required to be installed.

See Table 1, below, for facility-wide and emission unit-specific potential to emit data for the Tekoi Landfill based on information reported by Waste Management in its June 2020 Part 71 renewal permit application.

Table 1: Tekoi Landfill Potential to Emit in Tons Per Year (tpy)

Emission Unit ID	Regulated Air Pollutants (tpy)										
	NO_X	CO	VOC	PM	SO_2	CH_2O	Total HAP	NMOC	CH_4	N_2O	CO_2
E1	0	0	32.5	0	0		14.80	83.2	18,878	0	12,979
E2	N/A	N/A	N/A	65.46	N/A	N/A	N/A	N/A	0	0	0
E3	8.67	1.07	0.48	0.33	1.48	0	0.02	0	0	0	23.98
E4	12.08	2.6	0.96	0.86	0.80	N/A	N/A	N/A	N/A	0	N/A
TOTAL	**20.75**	**3.67**	**33.94**	**66.65**	**2.28**		**14.82**	**83.2**	**18,878**	**0**	**13,003**

NO_x = oxides of nitrogen; CO = carbon monoxide; VOC = volatile organic compounds; PM = particulate matter; SO_2 = sulfur dioxide; CH_2O = formaldehyde; HAP = hazardous air pollutants; NMOC = nonmethane organic compounds; CH_4 = methane; N2O = nitrous oxide; CO_2 = carbon dioxide

Permit Number V-SV-000001-2021.00 Requirements and Compliance Status

The remainder of this report contains the requirements and other relevant information from Permit Number V-SV-000001-2021.00. Inspector notes discussing compliance status will follow each relevant permit requirement in **bold blue** font.

B. Facility Emission Points and Unit-Specific Information

Note: Engine changes have occurred at the facility since the Title V permit issued in 2022. The changes are identified below by strike through and underline. Table 4 summarizes regulatory requirements for select emission units.

Table 2 – Emission Units and Emission Generating Activities

Unit I.D.	Description	Control Equipment
E1	MSW Landfill MSW and C&D Debris Disposal	None
E2	Fugitive Dust Emissions from Paved and Unpaved Roads, and Material Handling	None
E3	John Deere (6.8L); 165 horsepower (hp) diesel-fired stationary compression ignition engine. Construction Date: Pre June 12, 2006; Manufactured 2002. Non-emergency generator to power lights.	None
E4 ~~IE1~~	Isuzu; 89 hp diesel-fired stationary compression ignition engine. Construction Date: Pre June 12, 2006; Manufactured 2000. Non-emergency generator to power fuel pump.	None

Table 3 – Insignificant Emission Units*

Emission Unit ID	Description
IE3	Honda; 13 hp gas-powered spark ignition engine. Constructed Date: ~~January 2016; Manufactured 2014.~~ Constructed Date: July 2023; Manufactured 2022 Non-emergency water pump.
IE4	1 - 12,000-gallon diesel fuel tank
IE5	Soil stockpiles
IE6	Leachate collection system
IE7	Diesel fuel storage
Unpermitted Emission Unit	Wacker-Neuson; 7.1 hp gas-powered spark ignition engine Constructed Date: April 2025 Non-emergency water pump. Third-party equipment to support temporary activities.

*Insignificant emission units can change at the facility as long as the new or replacement units meet the criteria for insignificance, and TLF supplies information as required under 40 CFR part 71 and this permit. The insignificant emission unit status does not exempt these emission units from the requirements of the New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that may apply.

Table 4: Requirements for Emission Units

Equipment	Applicable Requirements	Limitations	Monitoring	
			Method	Interval
E1 MSW Landfill	NSPS WWW MACT AAAA 40 CFR Part 62, Subpart OOO	No emissions limitations. GCCS not currently required but NMOC emission rate must be recalculated annually.	Calculations	Annual
E3 E4	MACT ZZZZ	No emissions limitations. Subject to the maintenance requirements in MACT ZZZZ Table 2d #1.	N/A	N/A
IE3	MACT ZZZZ NSPS JJJJ	Complies with MACT ZZZZ by complying with NSPS JJJJ. Must be manufacturer-certified to meet the emission standards for new nonroad SI engines in 40 CFR Part 90 or 1054.	N/A	N/A

II. 40 CFR Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

A. Applicability [40 CFR 60.4230]

40 CFR part 60, subpart JJJJ (Subpart JJJJ) applies to the following engines:

1. Honda engine identified as IE3 in Table 3 of this permit.

OBSERVATION: Engine IE3 is a 13 hp, gas-powered, non-emergency SI engine that was manufactured after July 1, 2008 and commenced construction after June 12, 2006; therefore, it is subject to NSPS JJJJ per § 60.4230(a)(4)(iii).

B. General Provisions [40 CFR 60.4246]

1. The Facility is subject to the requirements of 40 CFR part 60, subpart A – General Provisions as specified in Table 3 of Subpart JJJJ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 60, subpart A.

2. All reports required under 40 CFR part 60, subpart A shall be sent to the EPA at the following address as listed in §60.19:

   Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
   Enforcement and Compliance Assurance Division
   U.S. Environmental Protection Agency, Region 8
   1595 Wynkoop Street
   Denver, Colorado 80202–1129

   Reports may be submitted on electronic media where applicable through the Compliance and Emissions Reporting Data Interface (CEDRI).

C. Emission Standards [40 CFR 60.4233(a), 60.4234 and 60.4235]

1. The Permittee shall comply with the emissions standards for non-emergency, spark ignition (SI) internal combustion engine (ICE) less than 25 hp, for Emissions Unit IE3, as specified in § 60.4231(a).

2. The Permittee must operate and maintain the stationary SI ICE subject to the emission standards as required in § 60.4233 over the entire life of the engine, as specified in § 60.4234.

3. The Permittee shall use gasoline that meets the sulfur limit in 40 CFR 80.195, as specified in § 60.4235.

OBSERVATION: According to the manufacturer's information, engine IE3 has an engine displacement greater than or equal to 225 cubic centimeters (cc). Pursuant to § 60.4231(a), since engine IE3 has a maximum engine power less than or equal to 19 kW (25 hp) and was manufactured on or after January 1, 2011, it must be certified by the manufacturer to meet the emission standards and other requirements for new nonroad SI engines in 40 CFR 1054. Engine IE3 was installed in July 2023. On August 25, 2023, Waste Management submitted to EPA a copy of the certification for engine IE3, which indicates that the engine is designed to meet the relevant emission standards at 40 CFR 1054.

D. Compliance Requirements [40 CFR 60.4243]

The Permittee, as the owner and operator of stationary SI ICE that must comply with the emission standards specified in Section II.C. of this permit, shall demonstrate compliance according to one of the methods specified in paragraphs 1 or 2 of this section, as applicable:

1. Purchasing an engine certified according to the procedures specified in Subpart JJJJ for the same model year and demonstrating compliance according to one of the methods specified in paragraphs 1. (a) or (b) of this section:

   (a) If the Permittee operates and maintains the certified stationary SI ICE and control device according to the manufactures emission-related written instructions, the Permittee shall keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The Permittee shall also meet requirements as specified in 40 CFR 1068 subparts A through D, as applicable. If the Permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the stationary SI ICE will not be considered out of compliance; or

   (b) If the Permittee does not operate and maintain the certified stationary SI ICE and control device according to the manufactures emission-related written instructions, the engine will be considered a non-certified engine and the Permittee shall demonstrate compliance by keeping a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution practice for minimizing emissions, but no performance testing is required;

   or

2. Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in Section II.C. of this permit and according to the test methods and other procedures specified in § 60.4244, and according to the following:

As an owner or operator of a stationary SI ICE less than 500 hp, the Permittee shall perform initial performance testing, but the Permittee is not required to conduct subsequent performance testing unless the stationary engine undergoes rebuild, major repair or maintenance.

OBSERVATION: According to information provided by Waste Management, site personnel follow the manufacturer's instructions on operating and maintaining engine IE3 via the facility's "Preventive Maintenance Inspection Checklist" SOP, which is at least as stringent as the manufacturer's maintenance schedule. A copy of the manufacturer's maintenance manual was provided to the EPA as part of the Inspection Records and lists the following maintenance schedule for IE3.

MAINTENANCE SCHEDULE

REGULAR SERVICE PERIOD (3) / ITEM Perform at every indicated month or operating hour interval, whichever comes first.		Each use	After use	First month or 20 hrs.	Every 3 months or 50 hrs.	Every 6 months or 100 hrs.	Every year or 300 hrs.	Refer to page
Engine oil	Check level	o						29
	Change			o		o		30
Air filter	Check	o						32
	Clean				o (1)			33
	Replace						o *	33
Sediment cup	Clean					o		35
Spark plug	Check-adjust					o		36
	Replace						o	
Pump casing	Clean		o (4)					23, 40
Spark arrester (optional part)	Clean					o		38
Idle speed	Check-adjust						o (2)	—
Valve clearance	Check-adjust						o (2)	—
Combustion chamber	Clean	After every 500 hrs. (2)						—
Fuel tank and filter	Clean					o (2)		—
Fuel tube	Check	Every 2 years (Replace if necessary) (2)						—
Impeller	Check						o (2)	—
Impeller clearance	Check						o (2)	—
Pump inlet valve	Check						o (2)	—

*Replace the paper element type only.

(1) Service more frequently when used in dusty areas.

(2) These items should be serviced by your servicing dealer, unless you have the proper tools and are mechanically proficient. Refer to the Honda shop manual for service procedures.
See "Honda Publications" on page 60 for ordering information.

(3) For commercial use, log hours of operation to determine proper maintenance intervals.

(4) Drain pump casing after each use (rinse if you were pumping dirty water).

Mr. Dodek provided records of maintenance conducted on engine IE3 from August 2023 through June 2025. According to the preventative maintenance checklist in the records, level E service includes all items in the manufacturer's maintenance manual and must be performed annually or every 300 hours. Levels C and D service include all items in the maintenance manual except the Idle Speed, Valve Clearance, and Spark plug items. Level C and D service must be conducted every 6 months/100 hours and 12 months/300 hours, respectively. Waste Management logs hours of engine operation to determine proper maintenance intervals, as provided for in the engine maintenance schedule. See Table 5, below.

Table 5: Maintenance Conducted on Engine IE3

Engine Unit ID	Date of Inspection	Engine Meter Reading (hrs)	Oil & Filter Change	Inspect/ Change Air Filter	Notes
IE3	July 21, 2023	0			New Engine Installed
IE3	August 15, 2023	13			EPA Inspection Meter Reading
IE3	January 12, 2024	28	✓	✓	Level C service performed
IE3	July 15, 2024	64	✓	✓	Level C service performed
IE3	June 4, 2025	77	✓	✓	Level E service performed

E. Testing Requirements [40 CFR 60.4244]

For each performance test required, the Permittee shall comply with the procedures as specified in § 60.4244(a)-(f).

F. Notifications, Reports, and Records for Owners and Operators [40 CFR 60.4245]

1. The permittee shall keep records according to § 60.4245(a);

2. The Permittee shall submit initial notification as required in § 60.7(a)(1) and § 60.4245(c); and

3. The Permittee shall submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed according to § 60.4245(d).

III. 40 CFR Part 62, Subpart OOO – Federal Plan Requirements for Municipal Solid Waste Landfills

A. 40 CFR Part 62, Subpart OOO - Standards [40 CFR 62.16710 – 62.16730]

1. This facility is subject to the requirements of 40 CFR part 62, subpart OOO (Subpart OOO). Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of Subpart OOO.

2. Subpart OOO applies as follows:

   (a) § 62.16710(a) and § 62.16711(a)(1) – This MSW landfill is a designated facility that was constructed, reconstructed or modified on or before July 17, 2014;

   (b) § 62.16711(a)(2) – This facility has accepted waste at any time since November 8, 1987, or the landfill has additional capacity for future waste deposition; and

   (c) § 62.16711(c) – This facility has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters.

OBSERVATION: According to the initial design capacity report from March 2008, the design capacity of the Tekoi Landfill was 58,816,200 yd^3 (44,968,211 m^3). According to Waste Management, the landfill began construction on a vertical expansion in May 2013, which added roughly 4.6 million yd^3 of airspace to the landfill. LandGEM inputs in the most recent Tier 2 report for the landfill indicate a design capacity, by mass, of 47,939,986 short tons (42,490,424 Mg).

B. Standards for Municipal Solid Waste Landfill Emissions [40 CFR 62.16714(a), 62.16714(e), 62.16718(a), 62.16724(d)]

1. The Permittee shall calculate non-methane organic compound (NMOC) emission rate for the landfill using the procedure and default values specified in § 62.16718(a)(1).

2. **Tier 1**: The Permittee shall compare the calculated NMOC mass emission rate to the standard of 34 megagrams per year as required by § 62.16718(a)(2).

   (a) If the calculated NMOC emission rate is less than 34 megagrams per year using Tier 1, the Permittee shall:

(i) Submit an NMOC emission rate report as provided in § 62.16724(c); and
(ii) Recalculate the NMOC mass emission rate annually as required under § 62.16714(e) using the procedures specified in § 62.16718(a)(1) until such time as the calculated emission rate is equal to or greater than 34 megagrams per year or the landfill is closed.

(b) If the calculated NMOC emission rate using the default values of § 62.16718(a)(1) is equal to or greater than 34 megagrams per year using Tier 1, the Permittee shall either:

(i) Comply with § 62.16714(e)(2) as follows:

(A) Submit a collection and control system design plan prepared by a professional engineer within 1 year, as specified in § 62.16724(d);
(B) Install and operate gas collection and control system, as specified in § 62.16714(b) and (c) within 30 months after the first annual NMOC emission rate report in which the rate equals or exceeds 34 megagram per year; and
(C) Comply with the specifications for active collection systems as specified in § 62.16728;

or

(ii) Determine a site-specific NMOC concentration and recalculate the NMOC emission rate using the procedures provided in paragraph § 62.16718(a)(3) and identified as Tier 2 or determine a site-specific methane generation rate constant and recalculate the NMOC emission rate using the procedure provided in § 62.16718(a)(4) and identified as Tier 3.

OBSERVATION: The Tekoi Landfill has chosen to use Tier 2 procedures to determine a site-specific NMOC concentration and calculate the facility's NMOC emission rate. The most recent Tier 2 sampling was conducted January 23 through January 27, 2023. Results of the Tier 2 testing were provided to EPA on March 14, 2023, and indicate that the NMOC mass emission rate is less than 34 megagrams per year (Mg/yr). See the subsequent observation for details.

3. **Tier 2**: The Permittee shall calculate a site-specific NMOC concentration using the procedure provided in § 62.16718(a)(3) and recalculate the NMOC mass emission rate using the equations provided in § 62.16718(a)(1)(i) or (ii) using the average NMOC concentration from the collected samples instead of the default value in the equation in § 62.16718(a)(1). Within 60 days after determining the NMOC concentration and corresponding NMOC emission rate, the Permittee shall submit the results according to § 62.16724(j)(2).

(a) If the resulting NMOC mass emission rate is less than 34 megagrams per year using Tier 2, the Permittee shall:

(i) Submit a periodic estimate of NMOC emissions in an NMOC emission rate report as provided in § 62.16724(c);
(ii) Recalculate the NMOC mass emission rate annually as required under § 62.16714(e); and
(ii) Retest the site-specific NMOC concentration every 5 years using Tier 2.

(b) If the resulting NMOC mass emission rate is equal to or greater than 34 megagrams per year using Tier 2, the Permittee shall either:

(i) Comply with § 62.16714(e)(2) as follows:

(A) Submit a collection and control system design plan prepared by a professional engineer within 1 year as specified in § 62.16724(d);
(B) Install and operate a collection and control system, as specified in § 62.16714(b) and (c) within 30 months after the first annual NMOC emission rate report in which the rate equals or exceeds 34 megagram per year; and
(C) Comply with the specifications for active collection systems as specified in § 62.16728.

or

(ii) Determine a site-specific methane generation rate constant and recalculate the NMOC emission rate using the procedures specified in paragraph § 62.16718(a)(4) and identified as Tier 3 or conduct a surface emission monitoring demonstration using the procedures provided § 62.16718(a)(6) and identified as Tier 4.

OBSERVATION: A Tier 2 Sampling Report for the Tekoi Landfill was submitted to the EPA on March 14, 2023, which indicated that the site-specific NMOC concentration for the landfill was 428 parts per million by volume (ppmv) as hexane. Using the site-specific NMOC concentration and a projected waste acceptance rate of 177,210 Mg/yr (194,931 tpy)[3], the NMOC emission rate was calculated as 24 Mg/yr for 2023 and projected to be 31 Mg/yr in 2028; the 34 Mg/yr threshold was not projected to be exceeded until 2030.

If landfilling operations continue after May 23, 2025, the next Tier 2 testing is due in 2028.

4. **Tier 3**: The Permittee shall determine the site-specific methane generation rate constant using the procedure provided in § 62.16718(a)(4) and recalculate the NMOC mass emission rate using the site-specific methane generation rate constant, the NMOC concentration previously determined by Tier 2, and the equations provided in § 62.16718(a)(1).

(a) If the resulting NMOC mass emission rate is less than 34 megagrams per year using Tier 3, the Permittee shall:

(i) Submit a periodic emission rate report as provided in § 62.16724(c); and
(ii) Recalculate the NMOC emission rate annually as provided in § 62.16714(e)(1)(ii) using the equations in paragraph § 62.16718(a)(1), the site-specific methane generation rate constant, and NMOC concentration rate obtained by Tier 2 and submit a periodic rate report as provided in § 62.16724(c). The site-specific methane generation rate constant is performed only once, and the value obtained from this test shall be used in all subsequent annual NMOC emission rate calculations.

(b) If the resulting NMOC mass emission rate is equal to or greater than 34 megagrams per year using Tier 3, the Permittee shall comply with § 62.16714(e)(2) as follows:

(i) Submit a collection and control system design plan prepared by a professional engineer within 1 year; and
(ii) Install and operate a collection and control system, as specified in § 62.16714(b) and (c)

[3] According to the historical waste acceptance rates provided in the 2018 Tier 2 Sampling Report, the average waste acceptance rate from 2005 – 2017 was 168,018 Mg/yr (184,820 tpy). Annual waste acceptance rates were greater than 177,210 Mg/yr (194,931 tpy) in 2006, 2007, 2008, 2014, and 2021.

within 30 months after the first annual NMOC emission rate report in which the rate equals or exceeds 34 megagrams per year;

or

(iii) Conduct a surface emission monitoring demonstration using the procedures specified in § 62.16718(a)(6) and identified as Tier 4.

OBSERVATION: The NMOC mass emission rate determined using Tier 2 was less than 34 Mg/yr; therefore, Tier 3 testing was not conducted.

5. **Tier 4**: The Permittee shall conduct surface emission monitoring to demonstrate surface methane emissions are below 500 parts per million, using the procedure provided in § 62.16718(a)(6). This procedure shall be used only if the Permittee can demonstrate that NMOC emissions are greater than or equal to 34 megagrams per year but less than 50 megagrams per year using Tier 1 or Tier 2 procedures. In addition, the Permittee shall meet the criteria listed in § 62.16718(a)(6)(viii).

(a) If after four consecutive quarterly monitoring periods at a landfill, other than a closed landfill, there is no measured concentration of methane of 500 parts per million or greater from the surface of the landfill, the Permittee shall continue quarterly surface emission monitoring using the methods specified in § 62.16718(a)(6).

(b) If after four consecutive quarterly monitoring periods at a closed landfill, there is no measured concentration of methane of 500 parts per million or greater from the surface of the landfill, the Permittee shall conduct annual surface emission monitoring using the methods specified in § 62.16718(a)(6).

(c) If any measured surface concentration of methane is equal to or greater than 500 parts per million using Tier 4, the Permittee shall:

(i) Submit a collection and control system design plan prepared by a professional engineer within 1 year according to § 62.16724(d); and

(ii) Install and operate a collection and control system, as specified in § 62.16714(b) and (c) within 30 months after the first annual NMOC emission rate report in which the rate equals or exceeds 34 megagram per year based on Tier 2.

OBSERVATION: The NMOC mass emission rate determined using Tier 2 was less than 34 Mg/yr; therefore, Tier 4 testing was not conducted.

C. Compliance Provisions [40 CFR 62. 16720]

The Permittee shall follow the compliance provisions in § 62.16720(a) - (e) for an MSW landfill with a gas collection and control system used to comply with the provisions of § 62.16714(b) and (c).

OBSERVATION: No GCCS is required or installed at the Tekoi Landfill, therefore, the compliance provisions at § 62.16720(a) - (e) and § 62.16714(b) and (c) do not apply.

D. Monitoring of Operations [40 CFR 62.16722]

The Permittee shall follow the monitoring provisions in § 62.16722(a) - (h) for a MSW landfill with a gas collection and control system used to comply with the provisions of § 62.16714(b) and (c).

OBSERVATION: Since no GCCS is installed at the Tekoi Landfill, the monitoring requirements at § 62.16722(a) - (h) do not apply.

E. Reporting Guidelines [40 CFR 62.16724]

If the NMOC emission rate equals or exceeds 34 megagrams per year, the Permittee shall meet the applicable reporting requirements of § 62.16724(a) - (q).

OBSERVATION: On September 17, 2021, an Initial Design Capacity and NMOC Emission Rate Report were submitted as required by § 62.16724(a), showing the uncontrolled NMOC emission rate is less than 34 Mg/yr. Pursuant to § 62.16724(c)(3), if the NMOC emission rate reported is less than 34 Mg/yr in each of the next five consecutive years, the owner or operator may elect to submit an estimate of the NMOC emission rate for the next five-year period in lieu of the annual report. An estimate of the NMOC emission rate for 2023 – 2028 was submitted in March 2023. According to the 2023 Tier 2 Sampling Report, the NMOC emission rate is not projected to exceed 34 Mg/yr until 2030. Since no GCCS is installed at the Tekoi Landfill, the other provisions of § 62.16724(a) - (q) do not apply.

F. Recordkeeping Guidelines [40 CFR 62.16726]

The Permittee shall meet the applicable recordkeeping requirements of § 62.16726(a) - (j).

OBSERVATION: 40 CFR § 62.16726(a) requires each owner or operator to keep a copy of the design capacity report which triggered § 62.16714(e), records of the current waste-in-place, and records of the yearly waste acceptance rate. Annual waste acceptance rates for 2005 – 2022 were included in the most recent NMOC emission rate report. Landfill waste acceptance rates from January 2020 through August 15, 2023, and total waste-in-place through March 16, 2023 were provided to the EPA during the 2023 EPA Inspection. As part of this compliance evaluation, waste acceptance and waste-in-place from 2023 – 2025 were provided. As of March 16, 2023, the total in-place volume of waste at the landfill was 5,420,347yd^3 (3,239,888 short tons), and 207,977 tons of waste had been received since the previous survey on February 10, 2022. Approximately 361,000 tons of waste were received from March 16, 2023 – May 23, 2025. The final waste-in-place on May 23, 2025 was approximately 3,600,000 tons of waste (6,000,000 yd^3).

No GCCS is installed at the landfill, so the recordkeeping requirements at § 62.16726(b) - (e), (h), and (j) do not apply. Since the design capacity of the landfill is greater than 2.5 million megagrams or 2.5 million cubic meters, the requirements at § 62.16726(f) do not apply. The landfill has demonstrated emissions through Tier 2 testing, therefore the Tier 4 recordkeeping provisions of § 62.16726(g) do not apply.

IV. 40 CFR Part 63, Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste (MSW) Landfills

A. 40 CFR Part 63, Subpart AAAA - Standards [40 CFR 63.1930 – 63.1990]

1. This facility is subject to the requirements of 40 CFR part 63, subpart AAAA. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart AAAA.

   (a) 40 CFR part 63, subpart AAAA applies as follows: § 63.1935(a) - This facility is a MSW landfill that has accepted waste since November 8, 1987 or has additional capacity for waste deposition; and

(b) § 63.1935(a)(3) – This facility has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters and is an area source MSW landfill.

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 1 of 40 CFR part 63, subpart AAAA. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.

2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in §63.13:

Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202–1129

Reports may be submitted on electronic media where applicable through CEDRI.

C. Non-Methane Organic Compound Emission Rate < 50 Mg/year [40 CFR 63.1981(c)]

If the uncontrolled NMOC emission rate is less than 50 megagrams per year, as calculated according to § 63.1959(a) of 40 CFR part 63, subpart AAAA, the Permittee shall submit a periodic estimate of NMOC emissions in an NMOC rate report according to § 63.1981(c) and recalculate the NMOC mass emission rate annually as specified in § 63.1959(b) using the procedures specified in § 63.1959(a) until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, or the landfill is closed.

[Explanatory note: Calculation of NMOC emission rate and submittal of an NMOC emission rate report under the provisions of § 62.16724(c) of the federal plan constitutes compliance with the NMOC emission rate calculation and reporting requirements of § 63.1981(c).]

OBSERVATION: According to the most recent Tier 2 testing conducted for Tekoi Landfill, the 2023 NMOC emission rate is calculated to be approximately 24 Mg/yr. An NMOC emission rate report was submitted on September 17, 2021, as required by Federal Plan OOO under the provisions of § 62.16724(c), meeting the requirements of § 63.1981(c). See Section III.B and III.E., above.

D. Non-Methane Organic Compound Emission Rate ≥ 50 Mg/year [40 CFR 63.1955(a)]

Before September 28, 2021, if the uncontrolled NMOC emission rate is equal to or greater than 50 megagrams per year, as calculated according to § 63.1959(a) of the 40 CFR part 63, subpart AAAA, the Permittee may comply with 40 CFR part 63, subpart AAAA by meeting the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping and reporting requirements as specified in Subpart OOO, as provided for under § 63.1955(a), with the exceptions as outlined in that section. The Permittee shall alternatively comply with the following standards, monitoring, recordkeeping and reporting requirements that apply to the facility.

[Explanatory note: The requirements of Subpart OOO are summarized in the section III of this permit.]

OBSERVATION: Since the current NMOC emission rate for the Tekoi Landfill is less than 50 Mg/yr, these requirements do not apply.

1. **Standards for Air Emissions** [40 CFR 63.1955(a) and 63.1959(a)]

(a) The Permittee shall operate the collection and control system in accordance with §§ 63.1958, 63.1960 and 63.1961.

(b) The Permittee shall comply with the general provisions as specified in Table 1 of 40 CFR part 63, subpart AAAA.

(c) For approval of collection and control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions, the Permittee must follow the procedures in 40 CFR 63.1959(b)(2). If alternatives have already been approved under Subpart OOO, these alternatives can be used to comply with 40 CFR 63, subpart AAAA, except as specified in § 63.1981(d)(2).

OBSERVATION: No GCCS is installed at the Tekoi Landfill so the requirements of this section do not apply.

2. **Compliance Provisions** [40 CFR 63.1960]

Compliance shall be determined by the requirements of § 63.1960. If the Permittee seeks to demonstrate compliance with the operational standards in § 63.1958(e)(1), the provisions of subpart AAAA shall apply at all times, including periods of startup, shutdown, and malfunction (SSM). During periods of SSM, the Permittee shall comply with the work practice requirements specified in § 63.1958(e) in lieu of the compliance provisions in § 63.1960.
[Note to Permittee: If the facility has emissions greater than 50 Mg/yr and the Permittee begins compliance provisions as specified in 40 CFR 63.1960, following those provisions supersedes the provisions used to comply with Subpart OOO and the Permittee shall continue complying with the Subpart AAAA compliance provisions from that date, which includes additional reporting requirements and compliance provisions of Subpart AAAA.]

OBSERVATION: Based on its current calculated NMOC emission rate, no GCCS is required to be installed at the Tekoi Landfill. Therefore, the requirements of § 63.1960 do not apply.

3. **Monitoring of Operations** [40 CFR 63.1961]

The Permittee shall follow the monitoring provisions in § 63.1961(a) - (h) for a MSW landfill with a gas collection and control system.

OBSERVATION: Based on its current calculated NMOC emission rate, no GCCS is required to be installed at the Tekoi Landfill. Therefore, the requirements of § 63.1961 do not apply.

4. **Recordkeeping and Reporting Requirements** [40 CFR 63. 1981 and 63.1983]

(a) The Permittee shall keep records as specified in § 63.1983 and in the general provisions in Table 1 of 40 CFR part 63, subpart AAAA.

(b) The Permittee shall submit the reports specified in this § 63.1981 and the reports specified in Table 1 to subpart AAAA. If the Permittee has previously submitted a design capacity report, amended design capacity report, initial NMOC emission rate report, initial or revised collection

and control system design plan, closure report, equipment removal report, or initial performance test under 40 CFR part 60, subpart WWW or a federal plan, then that submission constitutes compliance with the corresponding reporting requirements of § 63.1981. The Permittee shall include a statement certifying prior submission of the respective report(s) and the date of submittal in the first semi-annual report required in § 63.1981.

OBSERVATION:
The initial design capacity report containing the information specified in NSPS WWW at § 60.757(a) as required by § 63.1981(a) was submitted for the Tekoi Landfill on March 31, 2008.

According to Waste Management, the landfill design capacity has not been amended during the compliance period, therefore the requirements of § 63.1981(b) do not apply.

NMOC emission rate reports appear to have been submitted via the Tier 2 reporting in 2018 and 2023, per NSPS WWW or the Federal Plan OOO, as required by § 63.1981(c).

Based on its current calculated NMOC emission rate, no GCCS is required to be installed at the Tekoi Landfill. Therefore, the requirements of § 63.1981(d) – (m) do not apply.

The reporting requirements of § 62.16726(a)-(j) mirror the reporting requirements of § 63.1983. See Section III.F for a summary of facility compliance with § 62.16726(a)-(j)

V. 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants from Reciprocating Internal Combustion Engines

A. Applicability[40 CFR 63.6585 – 63.6590]

40 CFR part 63, subpart ZZZZ applies to the following emission units:

1. John Deere engine identified as E3 in Table 2 of this permit;

2. Isuzu engine identified as E4 in Table 2 of this permit;

3. Honda engine identified as IE3 in Table 3 of this permit.

OBSERVATION: Engine E3 is a 165 hp, diesel-fired, non-emergency, non-black start CI stationary RICE. Engine E4 is an 89 hp, diesel-fired, non-emergency, non-black start CI stationary RICE. Both E3 and E4 were constructed prior to June 12, 2006, so, pursuant to § 63.6590(1)(iii), are considered existing stationary RICE located at an area source of HAP emissions. Engines E3 and E4 were removed from the facility on June 12, 2025.

Engine IE3 is a 13 hp, gas-powered SI engine that was constructed in July 2023. Pursuant to § 63.6590(2)(iii), under MACT ZZZZ, engine IE3 is considered a new stationary RICE located at an area source.

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 8 of 40 CFR part 63, subpart ZZZZ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.

2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in §63.13:

Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202–1129

Reports may be submitted on electronic media where applicable through CEDRI.

C. Requirements for Engine IE3 [40 CFR 63.6590(c)(1)]

For Emissions Unit IE3, the Permittee shall meet the requirements of 40 CFR part 63, subpart ZZZZ by meeting the requirements of Subpart JJJJ, for stationary SI ICE. No further requirements apply to Emissions Unit IE3 under 40 CFR part 63. The applicable requirements of Subpart JJJJ are specified in Section II of this permit.

OBSERVATION: Since engine IE3 is considered a new stationary RICE located at an area source, pursuant to § 63.6590(c)(1), it complies with MACT ZZZZ by complying with NSPS JJJJ. See Section II, above, for a discussion of NSPS JJJJ requirements for engine IE3.

D. Requirements for Engines E3 and E4

1. **Emission and Operating Limitations** [40 CFR 63.6603(a) and Table 2d: 1(a)-(c)]

(a) Except during periods of startup, the Permittee shall:

i. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(b) During periods of startup the Permittee shall minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

OBSERVATION: The EPA requested maintenance records for engines E3 and E4 for 2023 through June 2025. Engine E4 was initially described as engine IE1 in the 2022 Title V Permit, although the unit has not changed. According to information provided by Waste Management, site personnel follow the manufacturer's instructions on operating and maintaining engines E3 and E4 via the facility's "Preventive Maintenance Inspection Checklist" SOP, which is at least as stringent as MACT ZZZZ and the manufacturer's maintenance schedule. A copy of the manufacturer's maintenance manuals for E3 and E4 were provided to the EPA as part of the Inspection Records. All required maintenance appears to have been conducted according to the timelines prescribed by MACT ZZZZ as well as according to the engine manuals. According to the records provided by Mr. Dodek, inspections were conducted on the engines as described in Table 6, page 19, below.

Table 6: Maintenance Conducted on Engines E4 (IE1) and E3

Engine Unit ID	Serial Number	Date of Inspection	Engine Meter Reading (hrs)	Oil & Filter Change	Inspect Air Cleaner	Inspect Hoses & Belts	WM Preventive Maintenance Inspection Level
IE1	7202621	April 25, 2022	16,018	✓	✓	✓	Level C
IE1	7202621	January 4, 2023	16,097 [a]	✓	✓	✓	Level E
IE1	7202621	July 11, 2023	16,097	✓	✓	✓	Level C
E4	7202621	August 15, 2023	16,104	EPA Inspection Meter Reading			
E4	7202621	January 12, 2024	16,131	✓	✓	✓	Level C
E4	7202621	July 15, 2024	16,150	✓	✓	✓	Level E
E4	7202621	June 4, 2025	16,203	✓	✓	✓	Level C
E4	7202621	June 12, 2025	16,203	Final Meter Reading upon removal			
E3	7500896	June 6, 2022	15,415	✓	✓	✓	Level C
E3	7500896	January 4, 2023	15,670	✓	✓	✓	Level E
E3	7500896	May 1, 2023	15,984	✓	✓	✓	Level D
E3	7500896	August 15, 2023	16,145	EPA Inspection Meter Reading			
E3	7500896	September 7, 2023	16,227	✓	✓	✓	Level C
E3	7500896	September 13, 2023	16,268	✓	✓	✓	Level C
E3	7500896	October 6, 2023	16,355	Non-routine: Replace Oil Pressure Sensor			
E3	7500896	October 23, 2023	16,429	✓	✓	✓	Level E
E3	7500896	December 22, 2023	16,671	✓	✓	✓	Level C
E3	7500896	February 23, 2024	16,875	✓	✓	✓	Level D
E3	7500896	May 10, 2024	17,107	✓	✓	✓	Level C
E3	7500896	August 14, 2024	17,317	✓	✓	✓	Level E
E3	7500896	June 4, 2025	17,957	✓	✓	✓	Level D
E3	7500896	June 12, 2025	17,957	Final Meter Reading upon removal			

[a] The engine meter reading was not captured in the records for this work order. The next available engine hour reading from July 11, 2023, was recorded to be 16,097 hours. This indicates that the maintenance was performed prior to the 1,000-hour MACT ZZZZ interval and before the 250-hour maintenance manual schedule in which maintenance is required, despite the missing reading.

2. **Testing and Initial Compliance Requirements** [40 CFR 63.6625(e)(4) and Table 6: 9(a)(i)-(ii)]

The Permittee must operate and maintain the stationary reciprocating internal combustion engine (RICE) and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide, to the extent practicable, for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions.

OBSERVATION: Engines E3 and E4 comply with § 63.6625(e) by using a site-specific maintenance plan. A copy of this plan was provided to the EPA by Mr. Dodek on June 26, 2025. The maintenance plan includes the following preventative maintenance requirements: (1) change the oil and filter every 250 hours of operation or every 180 days, (2) inspect all hoses and belts every 250 hours of operation or every 180 days, and replace as necessary, and (3) inspect the air cleaner every 250 hours of operation or every 180 days and replace as necessary.

3. **Continuous Compliance Requirements** [40 CFR 63.6640(a)]

(a) The Permittee must be in compliance with the emission limitations, operating limitations, and other requirements which apply, at all times.

(b) The Permittee must operate and maintain the engines, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions, at all times.

(c) The Permittee must demonstrate continuous compliance with each emission limitation, operating limitation and other requirements that apply.

OBSERVATION: Pursuant to Table 2d (#1) to MACT ZZZZ, no emission limitations apply to non-emergency, non-black start CI stationary RICE ≤ 300 hp. Except during periods of startup, engines E3 and E4 must comply with the maintenance requirements described in Section V.D.1., above, but no other continuous compliance requirements appear to apply.

4. **Notifications, Reports, and Records** [40 CFR 63.6645, 63.6650, 63.6655, 63.6660]

(a) The Permittee must submit notifications as specified in § 63.6645(a).

(b) The Permittee must submit reports as specified in § 63.6650(a-c) and (f).

(c) The Permittee must keep records as specified in § 63.6655(a), (d), and (e).

(d) The Permittee must keep the records in the format and for the duration as specified in § 63.6660.

OBSERVATION: Pursuant to § 63.6645(a)(2) and § 63.9(b), an initial notification was required to be submitted; however, the initial notification was due prior to the time period covered by this full compliance evaluation. According to § 63.6650 and Table 7 of MACT ZZZZ, there do not appear to be any reporting requirements for existing non-emergency non-black start CI stationary RICE ≤ 300 hp located at an area source of HAP. As specified in § 63.6655 and § 63.6656, records of an initial notification, any malfunctions, performance tests, and maintenance on air pollution control devices and monitoring equipment are required to be kept for five years from the date of occurrence. No malfunctions have been reported on semi-annual or annual compliance reports for Tekoi Landfill, and, since no air pollution control devices are installed on the engines at the landfill, no records of performance tests or maintenance on control devices or monitoring equipment would be required.

VI. Facility-Wide Requirements [40 CFR 71.6(a)(1)]

Conditions in this section of this permit apply to all emissions units located at the source, including any units not specifically listed in Table 2 of the Facility Emission Points section of this permit.

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants (HAPs) is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

OBSERVATION: According to Waste Management no off-permit changes have taken place at the facility from 2020 - present.

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report has already been submitted for this facility. Reports shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6-month period ending on the last day of December before the report is due. The report due on October 1st shall cover the 6-month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "SIXMON" for 6 month monitoring reports. The form may be found on EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.]

OBSERVATION: Semi-annual reports submitted to EPA for the Tekoi Landfill since 2020 are detailed in Table 7. One deviation, reported on October 16, 2024, reported that the Semi-annual report for that reporting period was submitted On October 16, 2024, after the October 1, 2024 deadline. Additionally, an amended report for the Semi-annual report covering 7/1/2022 – 12/31/2022 was submitted on 8/25/2023 after EPA provided compliance assistance notifying the facility that it certified compliance for the old permit, rather than certifying compliance for the permit conditions updated in 2022. No non-compliance or deviations were reported in the updated report.

Table 7: Facility-Wide Semi-Annual Emissions (SIXMON) Reports

Reporting Period	Report Date	Report Rcvd	Notes
1/1/2020 – 6/30/2020	9/28/2020	9/28/2020	• 5-year NMOC emissions rate report submitted September 7, 2018 indicates NMOC emission rate less than 50 Mg/yr through 2022. • Reported that maintenance on IE1, IE3, and E3 conducted as required. • No off-permit changes reported. • No deviations reported.
7/1/2020 – 12/31/2020	3/30/2021	3/30/2021	• 5-year NMOC emissions rate report submitted September 7, 2018 indicates NMOC emission rate less than 50 Mg/yr through 2022. • Reported that maintenance on IE1, IE3, and E3 conducted as required. • No off-permit changes reported. • No deviations reported.
1/1/2021 – 6/30/2021	9/30/2021	9/30/2021	• Reported that landfill became subject to Part 62, Subpart OOO on 6/21/2021. Initial Design Capacity and NMOC Emission Rate Report submitted 9/17/2021 per 62.16724(a), showing NMOC < 34 Mg/yr. • Reported that maintenance on IE1, IE3, and E3 conducted as required. • No off-permit changes reported. • No deviations reported.
7/1/2021 – 12/31/2021	3/30/2022	3/30/2022	• 5-year NMOC emissions rate report submitted September 7, 2018 indicates NMOC emission rate less than 34 Mg/yr through 2022. • Reported that maintenance on IE1, IE3, and E3 conducted as required. • No off-permit changes reported.

			• No deviations reported.
1/1/2022 – 6/30/2022	9/26/2022	2/26/2022	• 5-year NMOC emissions rate report submitted September 7, 2018 indicates NMOC emission rate less than 50 Mg/yr through 2022. • Reported that maintenance on IE1, IE3, and E3 conducted as required. • No off-permit changes reported. • No deviations reported.
7/1/2022 – 12/31/2022	3/30/2023	3/30/2023 *Updated report received 8/25/2023	• ***An amended SIXMON report for this reporting period was submitted on 8/25/2023 updating permit references in the report to accurately reflect the new permit issued in 2022 as part of EPA compliance assistance from the August 2023 inspection. Compliance status was unchanged.** • 5-year NMOC emissions rate report submitted September 7, 2018 indicates NMOC emission rate less than 50 Mg/yr through 2022. • Reported that maintenance on IE3, E3 and E4 conducted as required. • No off-permit changes reported. • No deviations reported.
1/1/2023 – 6/30/2023	9/27/2023	9/27/2023	• 5-year NMOC emissions rate report submitted March 14, 2023 indicates NMOC emission rate less than 34 Mg/yr through 2028. • Reported that maintenance on IE3, E3 and E4 conducted as required. • No off-permit changes reported. • No deviations reported.
7/1/2023 – 12/31/2023	3/28/2024	3/28/2024	• 5-year NMOC emissions rate report submitted March 14, 2023 indicates NMOC emission rate less than 34 Mg/yr through 2028. • Reported that maintenance on IE3, E3 and E4 conducted as required. • No off-permit changes reported. • No deviations reported.
1/1/2024 – 6/30/2024	10/16/2024	10/16/2024	• 5-year NMOC emissions rate report submitted March 14, 2023 indicates NMOC emission rate less than 34 Mg/yr through 2028. • Reported that maintenance on IE3, E3 and E4 conducted as required. • No off-permit changes reported. • **Deviation report submitted 10/16/2024 to report that the SIXMON report was submitted after the deadline of October 1, 2024, due to tracking error.**
7/1/2024 – 12/31/2024	3/19/2025	3/19/2025	• 5-year NMOC emissions rate report submitted March 14, 2023 indicates NMOC emission rate less than 34 Mg/yr through 2028. • Reported that maintenance on IE3, E3 and E4 conducted as required. • No off-permit changes reported. • No deviations reported.

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with 40 CFR 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

(a) A situation where emissions exceed an emission limitation or standard;

(b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

(c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined as follows:

(a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.

(b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
(ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report must be made within 48 hours.
(iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.

(c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee must notify the EPA by telephone (1-800-227-6312) or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification must specify that this notification is a deviation report for a Part 71 permit]*. A written notice, certified consistent with the Submissions section of this permit must be submitted within 10 working days of the occurrence. All deviations reported under this section must also be identified in the 6-month report required under Condition 1 in this section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "PDR" for prompt deviation reporting. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.]

OBSERVATION: In the period covered by this full compliance evaluation, one deviation was reported to EPA on October 16, 2024, due to a late semi-annual monitoring report. See Table 7 above. The deviation was corrected at the time of the report.

VII. General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.

2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.

3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.

4. The Permittee shall send fee payment and a completed fee filing form to:

   U.S. Environmental Protection Agency
   OCFO/OC/ACAD/FCB
   Attn: Collections Team
   1300 Pennsylvania Avenue NW
   Mail Code 2733R
   Washington, D.C. 20004

5. The Permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in the Submissions section of this permit.

*[Explanatory note: The fee filing form "FF" and the fee calculation worksheet form "FEE" may be found on the EPA website at:*https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.]

6. Basis for calculating annual fee:

   (a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.

      (i) "Actual emissions" means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.
      (ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.
      (iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.

[Explanatory note: The presumptive fee amount is revised each calendar year to account for inflation, and it is available from the EPA prior to the start of each calendar year.]

   (b) The Permittee shall exclude the following emissions from the calculation of fees:

      (i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;
      (ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and
      (iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in 40 CFR 71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to 40 CFR 71.5(c)(11)(ii).

7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[Explanatory note: The fee calculation worksheet form already incorporates a section to help the Permittee meet this responsibility.]

8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR 71.6(a)(3)(ii).]

9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l).

10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.

11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

OBSERVATION: Annual fees received for the Tekoi Landfill for the 2020 - 2024 reporting years are displayed in Table 8, below.

Table 8: Annual Fees Received for the Tekoi Landfill

Reporting Year	Fee Paid	Submission Date
2020	$928.20	March 30, 2021
2021	$1023.39	March 30, 2022
2022	$1153.43	March 31, 2023
2023	$1260.67	March 29, 2024
2024	$1403.25	March 20, 2025

B. Annual Emissions Inventory [40 CFR 71.9(h)(1) and (2)]

1. The Permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAPs for this source for the preceding calendar year for fee assessment purposes. The annual emissions report shall be certified by a responsible official and shall be submitted each year to the EPA by April 1st.

2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

[Explanatory note: An annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR 71.9(h), has been incorporated into the fee calculation worksheet form as a convenience.]

OBSERVATION: Annual emissions reports received by EPA for the Tekoi Landfill are displayed in Table 9, page 26, below.

Table 9: Annual Emissions Reported for the Tekoi Landfill

Pollutant	Actual Emissions (tpy)				
	2020	2021	2022	2023	2024
NO_x	0.9	1.2	1.1	1.2	.79
VOC	5.0	5.2	5.5	6.1	6.44
SO_2	0.2	0.2	0.2	0.2	.13
PM_{10}	8.6	9.2	9.6	9.5	9.43
Lead	N/A	N/A	N/A	N/A	N/A
Total HAPs	2.3	2.4	2.6	2.7	4.48
TOTAL EMISSONS	17.0	18.2	19.0	19.7	21.3

C. Compliance Requirements [40 CFR 71.6(a)(6), Section 113(a) and 113(e)(1) of the CAA, and 40 CFR 51.212, 52.12, 52.33, 60.11(g), 61.12]

1. Compliance with the Permit

(a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(b) 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 in order to maintain compliance with the conditions of this permit.

(c) For the purpose of submitting compliance certifications in accordance with § 71.6(c)(5), or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]

(a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.

(b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

3. Compliance Certifications [40 CFR 71.6(c)(5)]

(a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by April 1st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a reporting form for annual compliance certifications. The form may be found on the EPA website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.]

OBSERVATION: Title V Annual Compliance Certifications (TVACCs) submitted since 2020 are shown in Table 10, page 27, below.

Table 10: Facility-Wide Title V Annual Compliance Certifications (TVACCs)

Reporting Period	Report Date	Report Rcvd	Notes
1/1/2020 – 12/31/2020	3/30/2021	3/30/2021	• Facility reported continuous compliance with all permit conditions. • No deviations reported.
1/1/2021 – 12/31/2021	3/30/2022	3/30/2022	• Facility reported continuous compliance with all permit conditions. • No deviations reported.
1/1/2022 – 12/31/2022	3/27/2023	3/28/2023	• Facility reported continuous compliance with all permit conditions. • No deviations reported.
1/1/2023 – 12/31/2023	3/28/2024	3/28/2024	• Facility reported continuous compliance with all permit conditions. • Tier 2 sampling performed January 23 – January 27, 2023. • No deviations reported.
1/1/2024 – 12/31/2024	3/19/2025	3/19/2025	• Facility reported continuous compliance with all permit conditions outside of deviation report. See Table 7. • **Deviation report submitted during the reporting period due to late semi-annual report submittal.**

(b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).

(c) The certification shall include the following:

(i) Identification of each permit term or condition that is the basis of the certification;
(ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;
(iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;
(iv) Such other facts as the EPA may require to determine the compliance status of the source; and
(v) Whether compliance with each permit term was continuous or intermittent.

D. Duty to Provide and Supplement Information [40 CFR 71.6(a)(6)(v), 71.5(a)(3), and 71.5(b)]

1. The Permittee shall furnish to the EPA, within a reasonable time, any information that EPA 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. Upon request, the Permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B.

2. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. In addition, a Permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

OBSERVATION: As part of this inspection, compliance records were provided by Waste Management on June 26, 2025, as requested.

E. Submissions [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

1. Any document (application form, report, compliance certification, etc.) required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Explanatory note: the EPA has developed a reporting form "CTAC" for certifying truth, accuracy and completeness of Part 71 submissions. The form may be found on EPA website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.]

All fee calculation worksheets and applications for renewals and permit modifications shall be submitted to:

Part 71 Permit Contact, Air Permitting and Monitoring Branch, 8ARD-PM
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

2. Except where otherwise specified, all reports, test data, monitoring data, notifications, and compliance certifications shall be submitted to:

Branch Chief, Air and Toxics Enforcement Branch, 8ENF-AT
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

3. CEDRI has the capability to receive Part 71 documents that require certification by a responsible official. Specifically, we have added a form to CEDRI under "State/Local/Tribe Rule or Permit." The form allows for the user to submit four types of documents under Part 71: Clean Air Act 502(b)(10) change notification, a semi-annual monitoring report, a deviation notification, and a title V application. The use of CEDRI for submitting these reports is not mandatory. The job aide for how to submit reports in general can be found here: https://www3.epa.gov/ttn/chief/cedri/Create_Reports_Job_Aide.pdf.

F. Severability Clause [40 CFR 71.6(a)(5)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

G. Permit Actions [40 CFR 71.6(a)(6)(iii)]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

OBSERVATION: The facility has indicated that they are ceasing operations and will seek revocation of the permit once operations have completely ceased, waste is no longer accepted, and emission units are removed, as applicable. As of the time of this inspection report, no revocation had occurred, and the facility was still subject to the Title V Permit.

H. Administrative Permit Amendments [40 CFR 71.7(d)]

The Permittee may request the use of administrative permit amendment procedures for a permit revision that:

1. Corrects typographical errors;

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

3. Requires more frequent monitoring or reporting by the Permittee;

4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;
5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or

6. Incorporates any other type of change which EPA has determined to be similar to those listed in (1) through (5) above.

[Note to Permittee: If 1 through 5 above do not apply, please contact the EPA for a determination of similarity prior to submitting the Permittee's request for an administrative permit amendment under this provision.]

I. Minor Permit Modifications [40 CFR 71.7(e)(1)]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:

   (a) Do not violate any applicable requirement;

   (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

   (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

(d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

(i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
(ii) An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA;

(e) Are not modifications under any provision of Title I of the CAA; and

(f) Are not required to be processed as a significant modification.

2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by EPA.

3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:
(a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

(b) The source's suggested draft permit;

(c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

(d) Completed forms for the permitting authority to use to notify affected States as required under 40 CFR 71.8.

4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

J. Significant Permit Modifications [40 CFR 71.7(e)(3), 71.8(d), and 71.5(a)(2)]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:

(a) Do not qualify as minor permit modifications or as administrative amendments;

(b) Are significant changes in existing monitoring permit terms or conditions; or

(c) Are relaxations of reporting or recordkeeping permit terms or conditions.

2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.

3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

K. Reopening for Cause [40 CFR 71.7(f)]

The permit may be reopened and revised prior to expiration under any of the following circumstances:

1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 71.7(c)(3);

2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

3. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

4. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

L. Property Rights [40 CFR 71.6(a)(6)(iv)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

M. Inspection and Entry [40 CFR 71.6(c)(2)]

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:

1. Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

4. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

N. Transfer of Ownership or Operation [40 CFR 71.7(d)(1)(iv)]

A change in ownership or operational control of this source may be treated as an administrative permit amendment if the EPA determines no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA.

O. Off Permit Changes [40 CFR 71.6(a)(12) and 40 CFR 71.6(a)(3)(ii)]

The Permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met, and that all records required by this section are kept for a period of 5 years:

1. Each change is not addressed or prohibited by this permit;

2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;

3. Changes under this provision may not include changes subject to any requirement of 40 CFR parts 72 through 78 or modifications under any provision of Title I of the CAA;

4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

5. The permit shield does not apply to changes made under this provision;

6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;

7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and

8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the change.

OBSERVATION: According to Waste Management, no off-permit changes have taken place in the last five years.

P. Permit Expiration and Renewal [40 CFR 71.5(a)(1)(iii), 71.5(a)(2), 71.5(c)(5), 71.6(a)(11), 71.7(b), 71.7(c)(1), and 71.7(c)(3)]

1. This permit shall expire upon the earlier occurrence of the following events:

   (a) Five (5) years elapse from the date of issuance; or

(b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.

2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.

3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.

4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.

5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected State, and tribal review.

6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

APPENDIX A: Site Overview

Figure 1: Tekoi Landfill Aerial Satellite Imagery

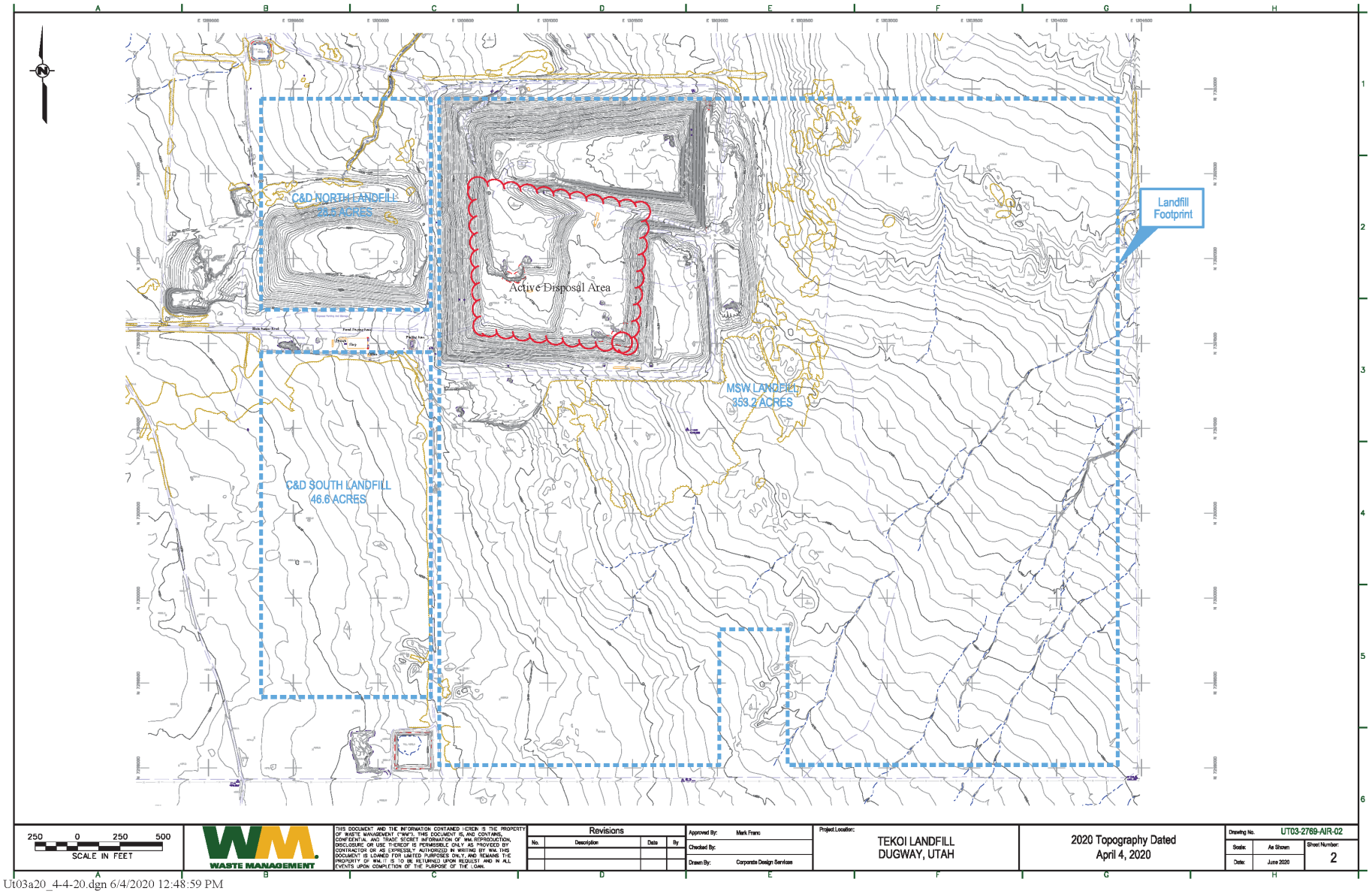

Figure 2: Site Map of Tekoi Landfill, April 2020