NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date: December xx, 2022

Region: Mooresville Regional Office
County: Rowan
NC Facility ID: 8000190
Inspector's Name: Melinda Wolanin
Date of Last Inspection: 02/16/2022
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): Rowan County Solid Waste Landfill

Facility Address:
Rowan County Solid Waste Landfill
789 Campbell Road
Woodleaf, NC 27054

SIC: 4953 / Refuse Systems
NAICS: 562212 / Solid Waste Landfill

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 02D .0517, 02D .1111
NSPS: N/A
NESHAP/MACT: Subpart AAAA, Subpart CCCCCC
PSD: N/A
PSD Avoidance: N/A
NC Toxics: N/A
112(r): N/A
Other: 40 CFR 62, Subpart OOO

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Jeff Boyd Rowan County Landfill Supervisor 789 Campbell Road Woodleaf, NC 27054 (704) 202-5585 Jeff.Boyd@rowancountync.gov	Randy Cress Assistant County Manager/CIO 130 West Innes Street Salisbury, NC 28144 (704) 216-8114 randy.cress@rowancountync.gov	Randy Cress Assistant County Manager/CIO 130 West Innes Street Salisbury, NC 28144 (704) 216-8114 randy.cress@rowancountync.gov

Application Data

Application Number: 8000190.21A
Date Received: 12/08/2021
Application Type: Modification
Application Schedule: TV-Reopen for Cause

Existing Permit Data
Existing Permit Number: 10405T02
Existing Permit Issue Date: 12/19/2019
Existing Permit Expiration Date: 11/30/2024

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2020	1.90	3.70	3.30	4.40	1.40	2.40	0.9873 [Hydrogen chloride (hydrochlori]
2019	2.00	4.00	3.20	4.70	1.50	2.49	1.02 [Hydrogen chloride (hydrochlori]
2018	0.4000	1.40	9.20	1.70	0.5000	4.55	1.62 [Toluene]
2017	---	0.1000	10.70	---	---	5.29	1.88 [Toluene]
2016	---	0.1000	10.30	---	---	5.09	1.81 [Toluene]

Review Engineer: Booker T. Pullen

Review Engineer's Signature: **Date:** XXXX xx, 2022

Comments / Recommendations:
Issue: 10405T03
Permit Issue Date: XXXX xx, 2022
Permit Expiration Date: 11/30/2024

1. Purpose of Application

The Rowan County Solid Waste Landfill is an active municipal solid waste (MSW) landfill located at 789 Campbell Road in Woodleaf, Rowan County, North Carolina. The landfill submitted the following permit application.

Application No. 8000190.21A was submitted in accordance with 15A NCAC 02D .0517 "Reopen For Cause" in order to replace the existing MACT AAAA conditions in the Title V permit to include the changes in the February 14, 2022 Federal Register, Volume 87, Issue 30 for this Subpart. Also, because the North Carolina Rules (15A NCAC 02D .1700) for existing landfills have not yet been approved in the State Implementation plan by the US EPA, the Federal regulations for existing landfills as codified in 40 CFR 62, Subpart OOO will be placed into the permit to replace the previous 40 CFR Subpart WWW regulations.

- In the February 14, 2022 Federal Register, the U.S. Environmental Protection Agency (EPA) finalized technical revisions and clarifications for the National Standards for Hazard Air Pollutants (NESHAP, Subpart AAAA) for MSW Landfills established in the March 26, 2020, final rule.
- This final rule also amended the MSW Landfill's NSPS regulations in 40 CFR Part 60, Subpart XXX, to clarify and align the timing of compliance for certain requirements involving the installation of a gas collection and control systems (GCCS) under related MSW landfill rules.
- Additionally, the EPA revised the definition of Administrator in the MSW Landfills Federal Plan that was promulgated on May 21, 2021 to clarify who has the authority to implement and enforce the applicable requirements. The final rule was effective February 14, 2022.

Application No. 8000190.21A was received and considered complete on December 8, 2021.

2. Facility Description

Rowan County landfill is classified as an existing municipal solid waste landfill located at 789 Campbell Road in Woodleaf, North Carolina. It is owned and operated by Rowan County and operates under Solid Waste permit No. 8003. The landfill property is approximately 375 acres, which consists of a closed land clearing and inert debris (LCID) landfill, a closed construction and demolition (C&D) landfill and a lined Subtitle D landfill. The Subtitle D landfill's total design capacity is approximately 15.071 million cubic yards consisting of Phases I through IX. Currently, Phases I, II, III, IIIA and IV are constructed with a total of 5,437,000 cubic yards of capacity. The Landfill has not modified the facility from the original permitted design plan and is currently approved in a "Life-of-Site" letter dated May 7, 2021 from the North Carolina Division of Waste Management to construct and operate Phases I through IV (Renewal application ID Number 1490634). Currently, Phase IV is active, and waste has been placed in Phase IV since August of 2015. The landfill has a mass and volume greater than 2.5 million Mg and 2.5 million m^3, and has demonstrated that the NMOC emission rate exceeds 50 Mg/yr. The landfill is required to operate a gas collection and control system (GCCS), and the collected gas is routed to a 1,500 scfm flare for incineration. In the existing phases, anaerobic decomposition of the buried municipal solid waste (MSW) materials produces landfill gas (LFG) which contains approximately 50% methane. Leachate from the existing phases is collected in a storage basin/pond. A mobile tub-grinder is also present on site.

3. Permit History

Revision No.	Issue Date	Description
T00	1/5/2015	Initial Greenfield permit issued.
T01	1/2/2018	Modification
T02	12/19/2019	Renewal/modification

4. Application Chronology

October 1, 2021 The North Carolina Division of Air Quality sent a Reopen for Cause letter to the Landfill.

December 8, 2021 Application No. 8000190.21A was received.

November 2, 2022 Draft permit and review sent to Regional Office. The Regional Office (Karen Kurek) responded on November 14, 2022 with no comments.

November 2, 2022 Draft permit and review sent to Stationary Compliance. Stationary Compliance responded on November 4, 2022 with no comments (Samir).

November 9, 2022 Draft permit sent to the Applicant. The applicant (W. Craig Powers) responded via phone call on November 30, 2022 stating they had no comments.

December xx, 2022 Draft permit and review sent to Public Notice.

5. Table of Changes to Existing Permit No. 10405T02

Old Page No. Existing permit	New Permit Section	Description of Changes
Page 1	Cover letter	● Updated letterhead and permit using new permit shell ● Updated permit revision numbers and dates throughout
Page 2	Cover letter	● Revised PSD increment tracking statement, changed engineers name to Booker Pullen along with contact information
Page 3	Cover letter	● Added page containing "Notice Regarding The Right to Contest A Division Of Air Quality Permit"
Page 4	Cover letter	● Revised the Summary of Changes to the Permit page
1st Page of Permit	1st Page of Permit	● Changed Permit number, changed "Replaces Permit" number ● Changed effective date and issue date of the Permit ● Revised the application number and complete application date
---	Table of Contents	● Added Section 3 as Insignificant Activities ● Added Section 4 as the General Conditions
---	List of Acronyms	● Added list to the front of the permit
---	Section 2.1 A Page 4	● Removed NSPS WWW citation for NMOC row and replaced with Federal regulations for existing landfills pursuant to 40 CFR 40 CFR 62, Subpart OOO
---	Section 2 Page 4	● Removed NSPS Subpart WWW applicability from table of regulated pollutants ● Added 40 CFR 62 Subpart OOO to permit for existing municipal solid waste landfills
---	Section 2.1 A.5 Pages 5-18	● Added MACT AAAA requirements
---	Section 2.1 A. Page 18-45	● Added 40 CFR 62, Subpart OOO requirements for existing municipal solid waste landfills
Page 22	Section 3 Page 46	● Added Insignificant Activities list
Pages 23-31	Section 4 Pages 47-55	● Added General Conditions (version 6.0, 01/07/2022)

Changes in Equipment at the facility

- None

6. Current Facility

The facility's permitted emission sources are as follows:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1 **MACT AAAA**	One municipal solid waste landfill	CD-GCCS CD-1	Gas collection and control system One landfill gas-fired candle stick type flare (1,500 standard cubic feet per minute maximum gas flow rate)

Insignificant Activities per 15A NCAC 02Q .0503(8)

Emission Source ID No.	Emission Source Description
IES-HD12	One Diesel fuel-fired HD12 Duratech Model tub grinder (portable non road engine = 500 hp rating)
IES-Leachate	One leachate storage basin (1,350,000 gallon capacity)
IES-Diesel	One Diesel fuel storage tank (10,000 gallon capacity)
IES-Gasoline **GACT CCCCCC**	One gasoline storage tank (200 gallon capacity)
IES-Wasteoil1	One waste oil storage tank (200 gallon capacity)
IES-Wasteoil2	One waste oil storage tank (200 gallon capacity)
IES-Wasteoil3	One waste oil storage tank (330 gallon capacity)
IES-Furnace	One waste oil-fired furnace used for comfort heating (0.175 million Btu per hour heat input)
IES-EG1 **GACT ZZZZ**	One LP gas-fired emergency generator (13 kW)

a. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the Permittee is exempted from demonstrating compliance with any applicable requirement.
b. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."
c. For additional information regarding the applicability of MACT or GACT see the DAQ page titled "Specific Permit Conditions Regulatory Guide." The link to this site is as follows: http://deq.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditions-regulatory-guide.

7. NSPS, Federal Standards for existing landfills, NESHAP, PSD, 112(r), CAM & Attainment Status

- **NSPS:**
  - The MSW landfill (ID No. ES-1) is not subject to 40 CFR 60, Subpart WWW "Municipal Solid Waste Landfills" since the facility is now considered an existing source under 40 CFR Subpart Cf "Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills" because the landfill has accepted waste after November 8, 1987 and was constructed prior to July 17, 2014.

- The MSW landfill (ID No. ES-1) is not subject to 40 CFR 60, Subpart XXX "Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification After July 17, 2014" since the landfill has not been modified after July 17, 2014. The Landfill has not been modified from the original permitted design plan and is currently approved in a Life-of-Site letter dated May 7, 2021 from the North Carolina Division of Waste Management to construct and operate Phases I through IV (Renewal application ID Number 1490634). Currently, Phase IV is active, and waste has been placed in Phase IV since August of 2015.

- **40 CFR 62, Subpart OOO – Federal Regulations for Municipal Solid Waste Landfills:**
  This facility is subject to the Part 70 Title V program because the design capacity of the landfill is greater than or equal to 2.5 million megagrams and 2.5 million cubic meters. This landfill is considered an "existing" landfill because it has accepted waste since November 8, 1987 and the landfill commenced construction, reconstruction, or modification on or before July 17, 2014. This existing landfill would be subject to the State Rules for North Carolina (as codified under 15A NCAC 02D .1700) for existing landfills if the rules have been approved by the US EPA.

  However, since the State Implementation Plan for North Carolina landfill rules for existing landfills has not yet been approved, the Federal rules pursuant to 40 CFR 62, Subpart OOO will apply until the rules in 15A NCAC 02D .1700 have been approved. Physical or operational changes made to an existing MSW landfill solely to comply with an emission standard under this Section are not considered a modification or a re-construction of the landfill, and do not subject an existing MSW landfill to the requirements of 40 CFR 60, Subpart XXX.

- **NESHAP/MACT:**

  - The MSW landfill (ID No. ES-1) is subject to 40 CFR 63, Subpart AAAA "Municipal Solid Waste Landfills" since the facility has accepted waste since November 8, 1987, has a design capacity greater than 2.5 million Mg and 2.5 million m^3, and has demonstrated an annual NMOC emission rate greater than 50 Mg/yr.

  - The MSW landfill (ID No. ES-1) is not subject to 40 CFR 61, Subpart M "National Emission Standard for Asbestos," since the landfill does not accept asbestos-containing wastes.

  - The LP gas-fired emergency generator (ID No. IES-EG1) is subject to 40 CFR 63, Subpart ZZZZ "Reciprocating Internal Combustion Engines" and is considered as an existing source.

  - The diesel-fired tub grinder (ID No. IES-HD12) is not subject to 40 CFR 63, Subpart ZZZZ "Reciprocating Internal Combustion Engines" because it is not a stationary source.

  - The gasoline storage tank (ID No. IES-Gasoline) is subject to 40 CFR 63, Subpart CCCCCC "Gasoline Dispensing Facilities" since the facility is an area source of HAPs, and the facility meets the definition of a gasoline dispensing facility as any stationary facility which dispenses gasoline into the tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. Gasoline storage tanks are listed as affected sources under 40 CFR 63.11111(a), and there are no size distinctions.

    Since IES-Gasoline is an insignificant activity, there is no permit condition, however the facility is still required to comply with Subpart CCCCCC. The facility has the general duty to minimize emissions by operating and maintaining affected sources, and their associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution practices for minimizing emissions. In addition, since the facility's throughput is expected to be less than 10,000 gallons per month based on throughput reported on the facility's annual AQEI, the facility is subject to the requirements of 40 CFR 63.11116. This section states that the facility must handle the gasoline in a manner which will not result in vapor release to the atmosphere for an extended period of time. Measures to be taken include, but are not limited to:

- Minimize gasoline spills;
- Clean up spills as expeditiously as practicable;
- Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices.

There are no notification or reporting requirements for facilities with a throughput of less than 10,000 gallons per month, however, the facility shall supply records of gasoline throughput within 24 hours of a request by DAQ. Additionally, should the facility's monthly gasoline throughput exceed 10,000 gallons, the facility will be subject to the requirements of 40 CFR 63.11117 for facilities with a monthly throughput of 10,000 gallons of gasoline or more, or 40 CFR 63.11118 for facilities with a monthly throughput of 100,000 gallons of gasoline or more, whichever is applicable, and must meet the applicable notification, testing, monitoring, recordkeeping, and reporting requirements.

If an affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable source threshold. [40 CFR 63.11111(i)]

- **PSD –** The facility's potential emissions of criteria pollutants do not exceed PSD permitting thresholds. Rowan County has triggered increment tracking under PSD for PM_{10}, $PM_{2.5}$, NOx and SO_2. This permit modification does not affect this status.

- **112(r) –** The facility does not store any of the listed 112(r) chemicals in amounts that exceed the threshold quantities. Therefore, the facility is not required to maintain a written Risk Management Plan (RMP).

- **CAM –** CAM does not apply since the facility is regulated by NSPS and MACT regulations that were promulgated after 1990 and control the pollutants that would be subject to CAM.

- **Attainment status** – Rowan County is in attainment for all criteria pollutants. The Charlotte-Gastonia-Rock Hill ozone non-attainment area, within which Rowan County was located, was reclassified as being in attainment as of July 28, 2015.

8. Regulatory Review

The facility is still subject to the following air quality regulations in addition to the General Conditions:

- 15A NCAC 02D .0516: Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 02D .0521: Control of Visible Emissions
- 15A NCAC 02D .1111: Maximum Achievable Control Technology - 40 CFR 63, Subpart AAAA; Subpart CCCCCC
- 15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions
- 40 CFR 62, Subpart OOO:

15A NCAC 02D .0524: New Source Performance Standards, 40 CFR 60, Subpart WWW will be removed from the permit because these requirements no longer apply.

15A NCAC 02D .0516: Sulfur Dioxide Emissions from Combustion Sources:
Sulfur dioxide emissions from the facility's combustion sources shall be no more than 2.3 pounds per million Btu heat input. For LFG combustion in the flare (ID No. CD-1), using AP-42 Chapter 2.4, Equations 3, 4, and 7, the SO_2 emission rate was determined to be 0.015 pounds per million Btu at the flare's total maximum capacity of 45.0 million Btu per hour, 1500 scfm and assuming a heat value of 500 Btu per ft^3 of LFG combusted (see calculation below). This value (0.015 pounds per million Btu) is well below the sulfur dioxide threshold. Continued compliance is indicated.

$$\text{Flare heat input} = \frac{1500\ \text{ft}^3}{\text{minute}} \times \frac{60\ \text{minutes}}{\text{hour}} \times \frac{500\ BTU}{\text{ft}^3} \times \frac{1\ million\ BTU}{1\ \text{x}\ 10^6} = \frac{45.0\ \text{million Btu}}{\text{hour}}$$

To calculate potential SO_2 emissions, AP-42 Chapter 2.4 was used:

- Flare design rating = 1,500 scfm (or 42.48 m^3/min = 2,548.8 m^3/hour)
- Methane is only 50% of this gas stream (1,274.4 m^3/hour)
- Q_S = Emission rate of reduced sulfur compounds, m^3/hour
- C_S = Concentration of reduced sulfur compounds (46.9 ppmv, AP-42)
- Multiplication factor for 50% methane concentration in landfill gas = 2.0
- Molecular weight of sulfur = 32.06 g/mole

$$Q_S = 2.0 \times Q_{CH_4} \times \left(\frac{C_S}{1\times10^6}\right) \text{ (AP-42, Equation 3)}$$

$$Q_S = 2.0 \times 1{,}274.4\ \frac{\text{m}^3}{\text{hour}} \times \left(\frac{46.9\ \text{parts}}{1\times10^6}\right) = 0.12\ \frac{\text{m}^3}{\text{hour}}$$

The mass of the pre-combustion sulfur present in the methane was found using Equation 4 of AP-42, Section 2.4.4.2.:

$$UM_s = 0.12\ \frac{\text{m}^3}{\text{hour}} \times \left[\frac{32.06\ \text{g/gmol} \times 1\ \text{atm}}{8.205 \times 10^{-5}\ \frac{\text{m}^3 - \text{atm}}{\text{gmol} - \text{K}} \times 1000\ \frac{\text{g}}{\text{kg}} \times (273 + 25°\text{C})\ \text{K}}\right] \times 2.205\ \frac{\text{pounds}}{\text{kg}}$$

$$UM_s = 0.35\ \frac{\text{pounds}}{\text{hour}}$$

To calculate SO_2 emitted from the combustion of sulfur, Equation 10 of Section 2.4-8 was used.

$$SO_2\ \text{emitted} = UM_s \times \frac{\eta_{col}}{100} \times 2.0$$

Where:
UM_S = Uncontrolled mass emission rate of sulfur compounds (0.34 lb sulfur/hour)
η_{col} = Collection efficiency of the landfill gas collection system, percent (assumed 100% for these purposes)
2.0 = Ratio of the molecular weight of SO_2 to the molecular weight of Sulfur

$$SO_2\ \text{emitted} = 0.35\ \frac{\text{lb}}{\text{hour}} \times \frac{100}{100} \times 2.0 \times 8{,}760\ \frac{\text{hours}}{\text{year}} \times \frac{1\ \text{ton}}{2{,}000\ \text{lb}} = 3.0\ \frac{\text{tons}\ SO_2}{\text{year}}$$

$$\text{Emission Rate}\ SO_2 = \frac{3.0\ \text{tons}\ SO_2}{\text{year}} \times \frac{2000\ \text{lbs}\ SO_2}{1\ \text{ton}\ SO_2} \times \frac{1\ \text{year}}{8760\ \text{hours}} \times \frac{\text{hour}}{45\ \text{million Btu}} = \frac{0.015\ \text{lbs}\ SO_2}{\text{million Btu}}$$

15A NCAC 02D .0521: Control of Visible Emissions

Visible emissions from the facility's LFG-fired utility flare (ID No. CD-1) shall not exceed 20% opacity when averaged over a six-minute period. Properly maintained and operated flares typically have no trouble meeting this requirement. Continued compliance is expected.

15A NCAC 02D .1111: Maximum Achievable Control Technology, 40 CFR 63, Subpart AAAA

The Rowan County Landfill (ID No. ES-1) is subject this Subpart because:

- this municipal solid waste landfill accepted waste since November 8, 1987, or has additional capacity for waste deposition, and

- this landfill is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m 3) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to 40 CFR 63.1959.

The MACT AAAA regulations contain the updated operational standards, compliance provisions, and monitoring requirements of 40 CFR 63.1958, 63.1960, and 63.1961, as well as the recordkeeping and reporting requirements of MACT AAAA. These conditions also include requirements for enhanced monitoring of elevated temperature wells. The landfill is required to continue wellhead monitoring and surface emissions monitoring, as well as continue to keep records and make periodic reports, some of which are required to be submitted electronically via EPA's electronic reporting tool in CDX.

For reports previously submitted, the Permittee is required to submit a statement with the first semi-annual report certifying that the listed reports were previously submitted to include the dates of submittal. As part of the updated requirements, the landfill will be required to develop a site-specific treatment monitoring plan for a LFG treatment system if it begins the sale of landfill gas for beneficial use.

The landfill's GCCS design plan was previously reviewed and approved by DAQ on May 25, 2018. Compliance is expected.

40 CFR 62 Subpart OOO: Federal Requirements for Municipal Solid Waste Landfills

The Rowan County landfill (ID No. ES-1) is classified as an existing MSW landfill because the landfill has accepted waste after November 8, 1987, was constructed before July 17, 2014 and has not been modified after this date. Existing landfills are subject to Emission Guidelines Subpart Cf, as codified in the North Carolina rule 15A NCAC 02D .1700 if these rules have been approved by the US EPA. Since the State Implementation Plan for North Carolina rules for existing landfills (15A NCAC 02D .1700) has not yet been approved, the permit conditions for NSPS WWW written in the existing permit will be removed and replaced with the Federal rules in accordance with 40 CFR 62, Subpart OOO. This landfill is required to install and operate a GCCS, and to route the collected gas to a control device/system.

Compliance is expected.

15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions

This is a "State-enforceable Only" requirement that applies facility wide. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary. According to the most recent inspection report dated December 16, 2022, no odors were protected beyond the property boundary at the time of inspection.

Compliance is indicated.

9. Compliance Status

DAQ has reviewed the compliance status of this facility. During the most recent inspection report dated February 16, 2022 by Melinda Wolanin of DAQ's Mooresville Regional Office, the facility appeared to be in compliance with their current permit.

10. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. No affected states or local agencies are within 50 miles of this facility.

11. Other Regulatory Requirements

- A Zoning Consistency Determination is NOT required for this permit application.
- No application fees were required for this Re-open For Cause application.

12. Comments and Recommendations

This Reopen for Cause Permit modification for the Rowan County landfill located at 789 Campbell Road in Woodleaf, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 10405T03.