



*Commonwealth of Virginia*

***VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY***

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Stefanie K. Taillon  
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director

July 1, 2025

Mr. Jason Byars  
Vice President  
Terreva Renewables  
889 Howell Mill Road NW, Suite 4300  
Atlanta, GA 30318  
[jbyars@terrevarenewables.com](mailto:jbyars@terrevarenewables.com)

Facility: Terreva Suffolk RNG, LLC  
Location: Suffolk  
**Registration No.: 61137**

Dear Mr. Byars:

Attached is an initial Title V permit to operate your facility pursuant to 9VAC5 Chapter 80 Article 1 of the Virginia Regulations for the Control and Abatement of Air Pollution. The attached permit will be in effect beginning July 1, 2025.

In the course of evaluating the application and arriving at a final decision to issue this permit, the Department of Environmental Quality (DEQ) deemed the application complete on October 14, 2024, and solicited written public comments by placing a newspaper advertisement in the Suffolk News Herald on Wednesday, May 14, 2025. The thirty-day required comment period, provided for in 9VAC5-80-270, expired on Friday, June 13, 2025.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

This permit approval to operate shall not relieve Terreva Suffolk RNG, LLC of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the DEQ within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.



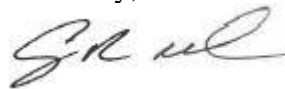
As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

Michael S. Rolband, Director  
Department of Environmental Quality  
PO Box 1105  
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Adriana Marcela Murphy at 757-567-1113 or by email at [adriana.murphy@deq.virginia.gov](mailto:adriana.murphy@deq.virginia.gov).

Sincerely,



Craig R. Nicol  
Regional Director  
Tidewater Regional Office  
5636 Southern Boulevard  
Virginia Beach, Virginia 23462  
757-518-2000

MSO/AMM/61137\_002\_25\_InitialT5\_TerrevaSuffolkRNG\_CvrLtr.docx

Attachment: Permit

cc: John Brandt, DEQ TRO Air Compliance Manager ([John.Brandt@deq.virginia.gov](mailto:John.Brandt@deq.virginia.gov))  
Maya Whitaker, DEQ Office of Air Permit Programs ([Maya.Whitaker@deq.virginia.gov](mailto:Maya.Whitaker@deq.virginia.gov))  
Yongtian (Tom) He, PhD, U.S. EPA Region III ([He.Yongtian@epa.gov](mailto:He.Yongtian@epa.gov))  
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Federal Operating Permit  
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9VAC5-80-50 through 9VAC5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Terreva Renewables  
Facility Name: Terreva Suffolk RNG, LLC  
Facility Location: 45 Bob Foeller Drive, Suffolk, Virginia 23434  
Registration Number: 61137  
Permit Number: TRO-61137

This permit includes the following programs:  
Federally Enforceable Requirements - Clean Air Act

**July 1, 2025**

**June 30, 2030**

Effective Date

Expiration Date

Craig R. Nicol, Regional Director

**July 1, 2025**

Signature Date

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## Facility Information

Permittee  
Terreva Renewables  
889 Howell Mill Road NW, Suite 4300  
Atlanta, GA 30318

Responsible Official  
Jason Byars  
Vice President  
[jbyars@terrevarenewables.com](mailto:jbyars@terrevarenewables.com)

Facility  
Terreva Suffolk RNG, LLC  
45 Bob Foeller Drive  
Suffolk, Virginia 23434

Contact Person  
Todd Gatewood  
Senior Director - Operational Services  
470-665-4287  
[tgatewood@terrevarenewables.com](mailto:tgatewood@terrevarenewables.com)

County-Plant Identification Number: 51-800-00109

### **Facility Description:** NAICS 325120 – Industrial Gas Manufacturing

Terreva Suffolk RNG, LLC (Suffolk RNG) owns and operates a renewable natural gas (RNG) facility which processes landfill gas (LFG) supplied by the nearby Southeastern Public Service Authority of Virginia (SPSA) Regional Landfill (Registration No. 61341) to produce pipeline quality gas. Suffolk RNG and SPSA Regional Landfill are considered a single source of air pollution emissions (common control determination) for the purpose of determining the appropriate level of permitting needed to meet the requirements of the Clean Air Act (CAA). The source (RNG facility and the landfill) is a Title V major source for carbon monoxide (CO) and an area source of Hazardous Air Pollutants (HAPs). The facility is located in the city of Suffolk, which is an attainment area for all air pollutants.

Suffolk RNG consists of a gas upgrading system that includes a series of gas compression, adsorption, and separation process equipment that convert raw LFG into pipeline quality gas. The components of the gas treatment system are not equipped with atmospheric vents. The waste gas, or off-gas from the gas upgrading system is collected and sent to a thermal oxidizer. Treated gas which does not meet pipeline specifications is routed to a backup flare for destruction. The facility is subject to the federal requirements of 40 CFR 63 (MACT) Subpart AAAA for Municipal Solid Waste Landfills.



## Emission Units

Process Equipment to be operated consists of:

### Renewable Natural Gas Facility

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
RNG	-	Renewable natural gas processing facility consisting of a series of gas compression, adsorption, and separation process equipment necessary to convert raw LFG from the SPSA Regional Landfill into pipeline quality gas	180,000 scf/hr	Thermal Oxidizer	TOx	VOC H <sub>2</sub> S TRS	01/26/2021
				Candlestick Back-up Flare	BF	VOC H <sub>2</sub> S TRS	
TOx	STK5	Perennial Energy Model No. PEI-FL-76X68-52-TP thermal oxidizer to control emissions from the waste gas produced by the Gas Upgrading System process	24.16 MMBtu/hr	-	-	-	01/26/2021
BF	STK6	Perennial Energy Biogas Candlestick back-up flare (10" diameter x 29 ft. high stack, with a 46" diameter shroud) to control emissions from the off-specification gas produced by the Gas Upgrading System process	82.62 MMBtu/hr	-	-	-	01/26/2021

\*The Size/Rated capacities and PCD efficiencies are provided for informational purposes only and are not applicable requirements.



## **Process Equipment Requirements – (Ref. Nos. RNG, TOx, and BF)**

### **Limitations**

1. **Process Equipment Requirements – (RNG)** - The landfill gas (LFG) collected at the Southeastern Public Service Authority of Virginia (SPSA) Regional collection system (Registration No. 61341) shall be routed to a treatment system (Ref. No. RNG) that processes the collected gas for subsequent sale or use and complies with the requirements of 40 CFR 63.1959(b)(2)(iii)(C) and (D). If the collected LFG cannot be routed to a treatment system (Ref. No. RNG) for subsequent sale or use, the collected LFG shall be routed to a control system that complies with the requirements in 40 CFR 63.1959(b)(2)(iii)(A) or (B). The permittee shall operate the control system at all times when collected gas is routed to the system.  
(9VAC5-80-110, 9VAC5-40-5935(A), 40 CFR 63.1959(b)(2)(iii), 40 CFR 1958(e) and (f), and Condition 1 of 01/26/2021 Permit)
2. **Process Equipment Requirements – (RNG)** - Venting of treated LFG to the ambient air shall not be allowed. If the treated LFG cannot be processed for subsequent use as pipeline quality gas, then the treated gas shall be controlled in accordance with Condition 3 of the permit. Atmospheric vents located on condensate storage tanks are not part of the treatment system.  
(9VAC5-80-110, 9VAC5-40-5935(A), 40 CFR 63.1959(b)(2)(iii)(C), and Condition 2 of 01/26/2021 Permit)
3. **Process Equipment Requirements - (TOx and BF)** - A 24.16 MMBtu/hr thermal oxidizer (Ref. No. TOx) shall be used to incinerate (oxidation) volatile organic compound (VOC), H<sub>2</sub>S, and TRS emissions from the waste gas produced by the Gas Upgrading System process. A 82.62 MMBtu/hr back-up candlestick flare (Ref. No. BF) shall be used to control VOC, H<sub>2</sub>S, and TRS emissions from the off-specification gas produced from the Gas Upgrading System process. The back-up candlestick flare shall be designed in accordance and comply with the requirements of 40 CFR Part 63.11(b) for minimum heating value and maximum tip velocity. Each emission control device shall be provided with adequate access for inspection and shall be in operation whenever gas is being routed to the device.  
(9VAC5-80-110, 9VAC5-40-5935(A), 40 CFR 63.1959(b)(2)(iii)(A), and Condition 3 of 01/26/2021 Permit)
4. **Process Equipment Requirements - (TOx)** - The thermal oxidizer (Ref. No. TOx) shall be designed and operated to either reduce NMOC by 98 weight percent or reduce the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at three percent oxygen. The reduction efficiency or parts per million by volume shall be established by an initial performance test.  
(9VAC5-80-110, 9VAC5-40-5935(A), 40 CFR 63.1959(b)(2)(iii)(B), and Condition 4 of 01/26/2021 Permit)



5. **Process Equipment Requirements - (TOx and BF)** - The thermal oxidizer (Ref. No. TOx) shall achieve a VOC, H<sub>2</sub>S, and TRS destruction efficiency of not less than 99 weight-percent on a mass basis and the back-up candlestick flare (Ref. No. BF) shall achieve a VOC, H<sub>2</sub>S, and TRS destruction efficiency of not less than 98 weight-percent on a mass basis.  
(9VAC5-80-110 and Condition 5 of 01/26/2021 Permit)
6. **Process Equipment Requirements - (TOx and BF)** - The permittee shall use good combustion practices at all times to ensure emissions from the emissions control devices (Ref. Nos. TOx and BF) are minimized. All operators of the devices shall be properly trained in the operation and maintenance of the equipment systems in accordance with the guidelines and procedures established by the equipment manufacturers. At all times the permittee must operate and maintain any affected source, including air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions as required in 40 CFR 63.1955(c).  
(9VAC5-80-110, 40 CFR 63.1955(c), and Condition 6 of 01/26/2021 Permit)
7. **Process Equipment Requirements - (TOx)** - The permittee shall be allowed to operate the thermal oxidizer (Ref. No. TOx) continuously (8,760 hours per year).  
(9VAC5-80-110 and Condition 12 of 01/26/2021 Permit)
8. **Process Equipment Requirements - (TOx)** - The thermal oxidizer (Ref. No. TOx) shall be operated such that the one-hour averaged temperature, as measured at the combustion chamber outlet, be maintained at or above the temperature during the initial performance test in which control efficiency was achieved. After twelve months of compliant operation, the averaging time for the temperature monitoring required by this condition shall be revised to a rolling three-hour average. The permittee shall calculate the three-hour average combustion temperature in accordance with 40 CFR 63.1983(c)(1)(i), except that the data collected during the events listed in 40 CFR 63.1975(a) are not to be included in any average computed. Unless otherwise approved by the DEQ Tidewater Regional Office, if a monitored rolling three-hour average temperature is less than the DEQ approved set-point temperature, the averaging time for the temperature monitoring required by this condition shall be revised to a one-hour average. The gases in the thermal oxidizer's combustion chamber shall have a minimum retention time of one second at or above the minimum specified combustion chamber temperature.  
(9VAC5-80-110, 9VAC5-40-5935, 40 CFR 63.1959(b)(2)(iii)(B)(2), 40 CFR 63.1975, and Condition 13 of 01/26/2021 Permit)
9. **Process Equipment Requirements - (BF)** - The back-up candlestick flare (Ref. No. BF) shall not operate more than 2,000 hours per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.  
(9VAC5-80-110 and Condition 14 of 01/26/2021 Permit)



10. **Process Equipment Requirements - (BF)** - In accordance with 40 CFR 63.11(b)(6), the permittee shall operate the back-up candlestick flare (Ref. No. BF) using either the heat content specifications of 40 CFR 63.11(b)(6)(ii) and the maximum tip velocity specifications of 40 CFR 63.11(b)(7) or (b)(8), or the requirements of 40 CFR 63.11(b)(6)(i).  
(9VAC5-80-110, 40 CFR 63.1959(b)(2)(iii)(A), and Condition 15 of 01/26/2021 Permit)
11. **Process Equipment Requirements - (TOx and BF)** - The approved fuel for use by the pilot flame burners in the emissions control devices (Ref. Nos. TOx and BF) is natural gas. The use of other fuels shall be considered a change in the method of operation of the affected emissions control device and may require a new or amended permit. However, if a change in the fuel is not subject to new source review permitting requirements, this condition should not be construed to prohibit such a change.  
(9VAC5-80-110 and Condition 16 of 01/26/2021 Permit)
12. **Process Equipment Requirements - (TOx and BF)** - The approved fuel for incineration in the thermal oxidizer (Ref. No. TOx) is waste gas produced from the Gas Upgrading System process. Approved fuel for combustion in the back-up candlestick flare (Ref. No. BF) is off-specification gas produced from the Gas Upgrading System process. A change in the fuel supplied to the associated emission control device shall be considered a change in the method of operation for the emission control device and may require a new or amended permit. However, if a change in the fuel is not subject to new source review permitting requirements, this condition should not be construed to prohibit such a change.  
(9VAC5-80-110 and Condition 17 of 01/26/2021 Permit)
13. **Process Equipment Requirements - (TOx)** - Emissions from the operation of the thermal oxidizer (Ref. No. TOx) shall not exceed the limits specified below:

PM	0.9 lb/hr	3.8 tons/yr
PM10	0.9 lb/hr	3.8 tons/yr
PM2.5	0.9 lb/hr	3.8 tons/yr
Sulfur Dioxide	2.2 lb/hr	9.7 tons/yr
Nitrogen Oxides (as NO <sub>2</sub> )	2.2 lb/hr	9.5 tons/yr
Carbon Monoxide	5.4 lb/hr	23.8 tons/yr
Volatile Organic Compounds	0.08 lb/hr	0.4 tons/yr



These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 3-8, 11, 12, 14, 19, 26, and 27.  
(9VAC5-80-110 and Condition 19 of 01/26/2021 Permit)

14. **Process Equipment Requirements - (TOx)** - Visible emissions from the thermal oxidizer (Ref. No. TOx) exhaust stack shall not exceed five percent opacity, as determined by 40 CFR 60, Appendix A, Method 9.  
(9VAC5-80-110 and Condition 20 of 01/26/2021 Permit)
15. **Process Equipment Requirements - (BF)** - The back-up candlestick flare (Ref. No. BF) shall be operated with no visible emissions, as determined by 40 CFR 60, Appendix A, Method 22, except for periods not to exceed a total of five minutes during two consecutive hours.  
(9VAC5-80-110, 9VAC5-40-5940, 40 CFR 63.11(b)(4), and Condition 21 of 01/26/2021 Permit)
16. **Process Equipment Requirements – (RNG, TOx, and BF)** - The provisions of this permit implementing 40 CFR 63 Subpart AAAA apply at all times, including periods of startup, shutdown, or malfunction. During periods of startup, shutdown, and malfunction, the source must comply with the work practice specified in 40 CFR 63.1958(e)(1) in lieu of the compliance provisions in 40 CFR 63.1960.  
(9VAC5-80-110, 9VAC5-40-5960, 40 CFR 63.1960(e)(2), and 40 CFR 63.1964(b))
17. **Maintenance/Operating Procedures – (RNG, TOx, and BF)** - At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the emissions control equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.



- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.  
(9VAC5-80-110 and Condition 31 of 01/26/2021 Permit)

## Monitoring

18. **Process Equipment Requirements - (TOx and BF)** - Each emissions control device (Ref. Nos. TOx and BF) shall maintain a continuous pilot flame during all operations involving the associated control device. Each pilot flame shall be equipped with a thermocouple(s) or other DEQ-approved equivalent heat sensing monitoring devices to detect the presence of the pilot flame. In addition, the pilot flame shall be equipped with an automatic alarm system that shall provide immediate notification to appropriate personnel of situations involving a flame failure or malfunction. The monitoring devices shall be installed, maintained, calibrated, and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements and/or recommendations. The flame sensing devices shall be provided with adequate access for inspection and be in operation whenever the emissions control device is operating.  
(9VAC5-80-110, 9VAC5-40-5965, 40 CFR 63.1961(c)(1), and Condition 7 of 01/26/2021 Permit)
19. **Process Equipment Requirements - (TOx)** - The thermal oxidizer (Ref. No. TOx) shall be equipped with a monitoring system(s) to continuously measure and record the temperature at or near the combustion chamber outlet to indicate the temperature in the chamber of the thermal oxidizer. The temperature monitoring device shall have a minimum accuracy of  $\pm 1$  percent of the temperature being measured expressed in degrees Celsius or  $\pm 0.5$  degrees Celsius, whichever is greater. The temperature shall be recorded at 15-minute intervals to generate three-hour temperature averages during periods when the thermal oxidizer is operating. Thermocouple(s) utilized by the monitoring system shall be calibrated annually, at a minimum. Each device shall be installed, maintained, calibrated, and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements and/or recommendations and be provided with adequate access for inspection, and be in operation when the thermal oxidizer is operating.  
(9VAC5-80-110, 9VAC5-40-5965, 40 CFR 63.1961(b)(1), and Condition 8 of 01/26/2021 Permit)
20. **Process Equipment Requirements - (BF)** - The back-up candlestick flare (Ref. No. BF) shall be equipped with a device to measure the main flame temperature (in °F) of the emissions control device. The monitoring system shall be capable of performing temperature measurements at 15-minute intervals and generating three-hour temperature averages during periods when the back-up candlestick flare is operating. The monitoring



device shall be installed, maintained, calibrated, and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation whenever the flare is operating.  
(9VAC5-80-110 and Condition 9 of 01/26/2021 Permit)

21. **Process Equipment Requirements - (BF)** - The recording device used to measure the main flame temperature for the back-up candlestick flare (Ref. No. BF) shall be observed by the permittee at a frequency of not less than once per operating day, or at another unit-specific frequency as recommended by the flare equipment manufacturer. The permittee shall keep a record log of the observations of the flame temperature. The record log should include the flame temperature reading (in °F) at the time of the observation, the date, time, the observer's name, and any corrective actions taken when the flare temperature is outside the acceptable range. Alternatively, the flame temperature may be monitored electronically if equipped with an automatic alarm to indicate to the permittee that the flare flame temperature is outside the acceptable range and corrective action is needed.  
(9VAC5-80-110 and Condition 10 of 01/26/2021 Permit)
22. **Process Equipment Requirements - (TOx and BF)** - In order to comply with the requirements of 40 CFR 63.1959(b)(2)(iii)(A) and (B), the equipment in 40 CFR 63.1961(b) and (c) must be installed, calibrated, maintained, and operated according to the manufacturer's specifications and 40 CFR 63.1961(b) and (c).  
(9VAC5-80-110, 9VAC5-40-5965, and 40 CFR 63.1961(b) and (c))
23. **Process Equipment Requirements - (RNG)** - The permittee must prepare, maintain and operate in accordance with a site-specific treatment system monitoring plan as specified in 40 CFR 63.1983(b)(5). Monitoring device installation, calibration, maintenance, and operation must be in accordance with 40 CFR 63.1961(g) at a minimum.  
(9VAC5-80-110, 9VAC5-40-5965, and 40 CFR 63.1961(g))
24. **Process Equipment Requirements - (RNG, TOx, and BF)** - The monitoring requirements in Conditions 18, 19, 22, and 23 apply at all times except as provided in 40 CFR 63.1961(h).  
(9VAC5-80-110, 9VAC5-40-5965, and 40 CFR 63.1961(h))
25. **Process Equipment Requirements - (RNG, TOx, and BF)** - The permittee shall demonstrate compliance using performance testing, continuous parameter monitoring, and other credible evidence. Continuous parameter monitoring data collected under 40 CFR 63.1961(b)(1), (c)(1), and (d) are used to demonstrate compliance with the operating standards for control systems. If a deviation occurs, the permittee has failed to meet the control device operating standards described in this subpart and have deviated from the requirements of this subpart.  
(9VAC5-80-110, 9VAC5-40-5955, and 40 CFR 63.1964)



## Recordkeeping

26. **Process Equipment Requirements - (TOx and BF)** - The permittee shall keep a record log documenting all occurrences when there was a flame malfunction to the thermal oxidizer (Ref. No. TOx) and/or back-up candlestick flare (Ref. No. BF) during operation of the associated emissions control device. The record log should include the name of the person reporting the occurrence, date, time, and duration of the occurrence, and a description of corrective actions taken, including date and time the repairs were completed. The logbook shall be made available for inspection by DEQ and be current for the most recent five years.  
(9VAC5-80-110, and Condition 11 of 01/26/2021 Permit)
27. **Process Equipment Requirements - (RNG, Tox, and BF)** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the DEQ Tidewater Regional Office. These records shall include, but are not limited to:
- a. Annual hours of operation for the back-up candlestick flare (Ref. No. BF), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;
  - b. Monitoring records of the recorded three-hour combustion chamber temperature averages for the thermal oxidizer (Ref. No. TOx) as required by Condition 19 of the permit;
  - c. The record logbook documentation (or electronic monitoring records) for the observations of the temperature readings (in °F) for main flame of the back-up candlestick flare (Ref. No. BF) as required by Condition 21 of the permit;
  - d. The record logbook documentation (or electronic monitoring records) for all malfunction episodes to the thermal oxidizer (Ref. No. TOx) and/or back-up candlestick flare (Ref. No. BF) as required by Condition 26 of the permit;
  - e. Results of all performance tests, visible emissions observations (VEO), and visible emissions evaluations (VEE) performed using EPA Method 9 or Method 22 (40 CFR 60, Appendix A) as required by this permit;
  - f. Scheduled and unscheduled maintenance and operator training; and



- g. The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9VAC5-80-110 and Conditions 25 and 32 of 01/26/2021 Permit)

28. **Process Equipment Requirements - (RNG, Tox, and BF)** - Unless specifically stated otherwise, records in this condition shall be kept for at least 5 years up-to-date and shall be readily accessible. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. Alternative records shall be kept for this timeline as provided in 40 CFR 63.1981(d)(2).

- a. The following records shall be kept for the life of the control system equipment as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring must be maintained for a minimum of 5 years. Records of the control device vendor specifications must be maintained until removal.
  - i. The flare type (i.e., steam-assisted, air-assisted, or non-assisted), all visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations of the back-up flare (Ref. No. BF) made during the performance test as specified in 40 CFR 63.11.
  - ii. Continuous records of the flare pilot flame or flare flame monitoring of the back-up flare (Ref. No. BF) specified under 40 CFR 63.1961(c).
  - iii. Records of all periods of operations during which the pilot flame of the back-up flare (Ref. No. BF) flame is absent.
  - iv. The average temperature of the thermal oxidizer (Ref. No. TOx) measured at least every 15 minutes and averaged over the same time period of the performance test.
  - v. The percent reduction of NMOC determined as specified in 40 CFR 63.1959(b)(2)(iii)(B) achieved by the thermal oxidizer (Ref. No. TOx).
- b. Records of the equipment operating parameters monitoring at the frequency specified in the approved site-specific treatment system monitoring plan as specified in 40 CFR 63.1983(b)(5)(ii).



- c. Records of the equipment operating parameters specified to be monitored in 40 CFR 63.1961.
- d. Records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.
- e. Continuous records of the indication of flow to the treatment system and control system and the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under 40 CFR 63.1961.
- f. Records of periods when the control device or treatment system is not operating.
- g. Records of the date, time, and duration of each startup and/or shutdown period, recording the periods when the affected source was subject to the standard applicable to startup and shutdown. In the event that an affected unit fails to meet an applicable standard, the records of the information in 40 CFR 63.1983(c)(7)(i)-(iii) shall be maintained.
- h. Records of the written procedures required by 40 CFR 63.8(d)(2), in lieu of the requirements specified in 40 CFR 63.8(d)(3), for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR 63. If the performance evaluation plan is revised, previous (i.e., superseded) versions of the performance evaluation plan shall be maintained to be made available for inspection upon request for a period of 5 years after each revision to the plan. The program of corrective action shall be included in the plan required under 40 CFR 63.8(d)(2).
- i. All control system exceedances of the operational standards in 40 CFR 63.1958, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.

(9VAC5-80-110, 9VAC5-40-5970, and 40 CFR 63.1983)

## Testing

- 29. **Process Equipment Requirements - (RNG, TOx, and BF)** - Upon reasonable request by the DEQ, the permittee shall conduct additional performance tests and visible emission evaluations on the emissions control devices to demonstrate compliance with the visible emission limits contained in the permit. Details of the tests shall be arranged with the DEQ Tidewater Regional Office.  
(9VAC5-80-110 and Condition 24 of 01/26/2021 Permit)
- 30. **Process Equipment Requirements - (TOx and BF)** - The thermal oxidizer (Ref. No. TOx) and back-up flare (Ref. No. BF) shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. This includes



constructing the equipment such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and providing a stack or duct that is free from cyclonic flow. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided. (9VAC5-80-110, 9VAC5-40-5965, 40 CFR 60.8(e), 40 CFR 63.7(d), and Condition 26 of 01/26/2021 Permit)

31. **Process Equipment Requirements - (RNG, TOx, and BF)** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ. (9VAC5-80-110)

### Reporting

32. **Process Equipment Requirements – (RNG, TOx, and BF)** - The following reports shall be submitted:
- Semi-annual reports shall be submitted that contain the information required in 40 CFR 63.1981(h). This information includes, but is not limited to, the information in 40 CFR 63.1981(h)(1)(iii), (h)(2), and (h)(3), as well as reportable exceedances as specified in 40 CFR 63.1983(c)(1)(i).
  - Performance test reports as required under 40 CFR 63.7 for the RNG thermal oxidizer (Ref. No. TOx) and back-up flare (Ref. No. BF) shall be submitted and shall include all the information required in 40 CFR 63.1981(i).

Each report shall be submitted to the Tidewater Regional Office. Reports shall be submitted in accordance with 40 CFR 63.1981(l) except as provided in 40 CFR 63.1981(m) and (n). A copy of each report shall be submitted also to EPA Region 3 ([Email: R3\\_APD\\_Permits@epa.gov](mailto:R3_APD_Permits@epa.gov)) except for reports submitted electronically in accordance with 40 CFR 63.1981(l). (9VAC5-80-110, 9VAC5-40-5970, and 40 CFR 63.1981)

### Insignificant Emission Units

33. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9VAC5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
-	None	-	-	-



These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9VAC5-80-110. (9VAC5-80-110)

## Permit Shield & Inapplicable Requirements

34. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart WWW	New Source Performance Standards for Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification on or After May 30, 1991, but Before July 18, 2014	This regulation became obsolete on July 23, 2020, as the landfill became subject to the more stringent requirements in the approved state plan that implemented NSPS Cf (Rule 4-43.1)
40 CFR 60 Subpart XXX	New Source Performance Standards for MSW Landfills that Commenced Construction After July 17, 2014	The landfill has not expanded in volume after 7/7/2014. The landfill is currently subject to Virginia State Plan 9VAC5 Chapter 40 Article 43.1

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act or (ii) the DEQ pursuant to §10.1-1307.3 or §10.1-1315 of the Virginia Air Pollution Control Law. (9VAC5-80-110 and 9VAC5-80-140)

## General Conditions

35. **General Conditions** - Federal Enforceability - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable. (9VAC5-80-110)
36. **General Conditions** - Permit Expiration -
- This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete



application for renewal to the Department consistent with the requirements of 9VAC5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

- b. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- c. If an applicant submits a timely and complete application for an initial permit or renewal under 9VAC5-80-80 F, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9VAC5 Chapter 80, until the DEQ takes final action on the application under 9VAC5-80-150.
- d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9VAC5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9VAC5 Chapter 80.
- e. If an applicant submits a timely and complete application under section 9VAC5-80-80 for a permit renewal but the DEQ fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9VAC5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- f. The protection under subsections F 1 and F 5 (ii) of section 9VAC5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9VAC5-80-80 D, the applicant fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(9VAC5-80-80, 9VAC5-80-110, and 9VAC5-80-170)

37. **General Conditions** - Recordkeeping and Reporting - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;



- e. The results of such analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

(9VAC5-80-110)

38. **General Conditions** - Recordkeeping and Reporting - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9VAC5-80-110)

39. **General Conditions** - Recordkeeping and Reporting - The permittee shall submit the results of monitoring contained in any applicable requirement to the DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
  - i. Exceedances of emissions limitations or operational restrictions;
  - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring or periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
  - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semiannual reporting period."

(9VAC5-80-110)

40. **General Conditions** - Annual Compliance Certification - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to the Environmental Protection Agency (EPA) and the DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including



emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a) (3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9VAC5-80-110, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to the EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

[R3-APD-Permits@epa.gov](mailto:R3-APD-Permits@epa.gov)

(9VAC5-80-110)

41. **General Conditions** - Permit Deviation Reporting - The permittee shall notify the Tidewater Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semiannual compliance monitoring report pursuant to Condition 39 of this permit.  
(9VAC5-80-110 F. 2)



42. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Tidewater Regional Office of such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Tidewater Regional Office.  
(9VAC5-80-110 and 9VAC5-20-180)
43. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.  
(9VAC5-80-110)
44. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.  
(9VAC5-80-110)
45. **General Conditions - Need to Halt or Reduce Activity not a Defense** - 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.  
(9VAC5-80-110)
46. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9VAC5-80-50, 9VAC5-80-1100, 9VAC5-80-1605, or 9VAC5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.  
(9VAC5-80-110, 9VAC5-80-190, and 9VAC5-80-260)
47. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.  
(9VAC5-80-110)
48. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the DEQ, within a reasonable time, any information that the DEQ 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 DEQ copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality.  
(9VAC5-80-110)

49. **General Conditions** - Duty to Submit Information - Any document (including reports) required in a permit condition to be submitted to the DEQ shall contain a certification by a responsible official that meets the requirements of 9VAC5-80-80 G.  
(9VAC5-80-110)
50. **General Conditions** - Duty to Pay Permit Fees - The owner of any source for which a permit was issued under 9VAC5-80-50 through 9VAC5-80-300 shall pay annual emissions fees, as applicable, consistent with the requirements of 9VAC5-80-310 through 9VAC5-80-350 and annual maintenance fees, as applicable, consistent with the requirements of 9VAC5-80-2310 through 9VAC5-80-2350.  
(9VAC5-80-110, 9VAC5-80-310 et seq., and 9VAC5-80-2310 et seq.)
51. **General Conditions** - Fugitive Dust Emission Standards - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
  - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
  - e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9VAC5-80-110 and 9VAC5-50-90)



52. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the DEQ, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.  
(9VAC5-80-110 and 9VAC5-50-20 E)
53. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9VAC5 Chapter 80, Article 1.  
(9VAC5-80-110)
54. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow the DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
  - d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (9VAC5-80-110)
55. **General Conditions - Reopening for Cause** - The permit shall be reopened by the DEQ if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such 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 has been extended pursuant to 9VAC5-80-80 F. The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the DEQ or the administrator 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.
- b. The permit shall be reopened if the administrator or the DEQ determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the DEQ if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9VAC5-80-110 D.

(9VAC5-80-110)

56. **General Conditions** - Permit Availability - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to the DEQ upon request. (9VAC5-80-110 and 9VAC5-80-150)

57. **General Conditions** - Transfer of Permits

- a. No person shall transfer a permit from one location to another, unless authorized under 9VAC5-80-130, or from one piece of equipment to another.
- b. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the DEQ of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9VAC5-80-200.
- c. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the DEQ of the change in source name within 30 days of the name change and shall comply with the requirements of 9VAC5-80-200.

(9VAC5-80-110 and 9VAC5-80-160)

58. **General Conditions** - Permit Revocation or Termination for Cause - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9VAC5 Chapter 80 Article 1. The DEQ may suspend, under such conditions and for such period of time as the DEQ may



prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.

(9VAC5-80-110, 9VAC5-80-190 C, and 9VAC5-80-260)

59. **General Conditions** - Duty to Supplement or Correct Application - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.  
(9VAC5-80-110 and 9VAC5-80-80 E)
60. **General Conditions** - Stratospheric Ozone Protection - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.  
(9VAC5-80-110 and 40 CFR Part 82)
61. **General Conditions** - Asbestos Requirements - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).  
(9VAC5-60-70 and 9VAC5-80-110)
62. **General Conditions** - Accidental Release Prevention - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.  
(9VAC5-80-110 and 40 CFR Part 68)
63. **General Conditions** - Changes to Permits for Emissions Trading - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.  
(9VAC5-80-110)
64. **General Conditions** - Emissions Trading - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
  - a. All terms and conditions required under 9VAC5-80-110, except subsection N, shall be included to determine compliance.



- b. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- c. The owner shall meet all applicable requirements including the requirements of 9VAC5-80-50 through 9VAC5-80-300.

(9VAC5-80-110)