

# TECHNICAL REVIEW: MUNICIPAL SOLID WASTE LANDFILLS (MSWLF) and TRANSFER STATIONS (TS)

|                        |        |                        |                                        |                      |                                  |
|------------------------|--------|------------------------|----------------------------------------|----------------------|----------------------------------|
| <b>SP Permit No.:</b>  | 81883  | <b>Company Name:</b>   | City of Brownsville                    | <b>APD Reviewer:</b> | Clare Hubbell                    |
| <b>SP Project No.:</b> | 394540 | <b>Site/Area Name:</b> | City Of Brownsville Municipal Landfill | <b>SP Rule:</b>      | Chapter §330, Subchapter U / MSW |

| GENERAL INFORMATION     |                           |                            |               |
|-------------------------|---------------------------|----------------------------|---------------|
| Regulated Entity No.:   | RN102975026               | Project Type:              | Amend         |
| Customer Reference No.: | CN600243448               | Date Received by TCEQ:     | June 23, 2025 |
| City/County:            | Brownsville, Cameron      | Date Received by Reviewer: | June 24, 2025 |
| Physical Location:      | 9000 Ruben Torres Sr Blvd |                            |               |

| CONTACT INFORMATION                                          |                                                          |                   |                |               |                                    |
|--------------------------------------------------------------|----------------------------------------------------------|-------------------|----------------|---------------|------------------------------------|
| <b>Responsible Official/ Primary Contact Name and Title:</b> | Helen Ramirez<br>Interim City Manager                    | <b>Phone No.:</b> | (956) 548-6007 | <b>Email:</b> | HELEN.RAMIREZ@BROWNsville.GOV      |
| <b>Technical Contact/ Consultant Name and Title:</b>         | Jose Roberto Maldonado<br>Landfill & Storm Water Manager | <b>Fax No.:</b>   | (956) 546-4021 | <b>Email:</b> | JOSE.R.MALDONADO@BROWNSVILLETX.GOV |
|                                                              |                                                          | <b>Phone No.:</b> | (956) 243-7097 |               |                                    |
|                                                              |                                                          | <b>Fax No.:</b>   | (956) 831-0180 |               |                                    |

| DESCRIBE OVERALL PROCESS AT THE SITE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The City of Brownsville landfill site is a Type I Category 3 landfill and has submitted an application for a Subchapter U (30 TAC § 330, Subchapter U) Municipal Solid Waste Landfill.</p> <p>This site is authorized under Municipal Solid Waste Landfill Standard Chapter §330, Subchapter U Permit No. 81883, as well as General Operating Permit (GOP) 517 No. O-2305 and MSW Landfills Authorization No. 1273A.</p> <p>The amendment application is being processed to include the following:</p> <ul style="list-style-type: none"> <li>To add particulate emissions from recycling operations taking place at the Site (RECYCLING).</li> <li>To provide a new LandGEM Version 3.03 Model since it has been updated from Version 3.02, and to update the last few years with actual waste intake.</li> </ul> <p>Total emission sources at the site are as follows:</p> <ul style="list-style-type: none"> <li>Landfill (waste mass);</li> <li>One 2,000-scfm open flare;</li> <li>One 3,000-gallon capacity diesel storage tank;</li> <li>Leachate management (via leachate ponds);</li> <li>Tire processing operations;</li> <li>Pavement recycling;</li> <li>Mulching operations; and</li> <li>Fugitive particulate emissions from landfill operations.</li> </ul> |

| COMPLIANCE HISTORY EVALUATION                |               |
|----------------------------------------------|---------------|
| A compliance history report was reviewed on: | June 30, 2025 |
| Site rating & classification:                | 0.00 / High   |
| Company rating & classification:             | 0.00 / High   |

| COMPLETE EACH SECTION AS APPROPRIATE FOR THE AIR AUTHORIZATIONS AFFECTED BY THIS REVIEW                                                                                                                                                                   |     |    |                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|--------------------------------------|
| GENERAL INFORMATION                                                                                                                                                                                                                                       | YES | NO | COMMENTS                             |
| Is confidential information included in the application?                                                                                                                                                                                                  |     | X  |                                      |
| MSW permit number                                                                                                                                                                                                                                         |     |    | 1273A                                |
| What air authorization is currently being used for the site?<br>Old Standard Exemption (registered or unregistered)<br>PBR (registered or unregistered)<br>Standard Permit<br>New Source Review (NSR) permit under §116.110<br>Title V GOP<br>Title V SOP |     |    | Subchapter U 81883<br>Title V O-2305 |
| Are there any Permits by Rule, Standard Exemptions, Standard Permits, NSR permits, or Title V permits to be voided in the IMS database as a result of this Standard Permit Certification?                                                                 |     | X  |                                      |
| Are all related projects included in this review?                                                                                                                                                                                                         | X   |    |                                      |
| Is this registration for a MSWLF (landfill) only?                                                                                                                                                                                                         | X   |    |                                      |
| Is this registration for a TS (transfer station) MSW type V only?                                                                                                                                                                                         |     | X  |                                      |

| FEDERAL RULE COMPLIANCE CHECK | YES | NO | COMMENTS |
|-------------------------------|-----|----|----------|
|-------------------------------|-----|----|----------|

# **TECHNICAL REVIEW: MUNICIPAL SOLID WASTE LANDFILLS (MSWLF) and TRANSFER STATIONS (TS)**

|                        |        |                        |                                        |                      |                                  |
|------------------------|--------|------------------------|----------------------------------------|----------------------|----------------------------------|
| <b>SP Permit No.:</b>  | 81883  | <b>Company Name:</b>   | City of Brownsville                    | <b>APD Reviewer:</b> | Clare Hubbell                    |
| <b>SP Project No.:</b> | 394540 | <b>Site/Area Name:</b> | City Of Brownsville Municipal Landfill | <b>SP Rule:</b>      | Chapter §330, Subchapter U / MSW |

|                                                                                                                                       |   |   |                                                                             |
|---------------------------------------------------------------------------------------------------------------------------------------|---|---|-----------------------------------------------------------------------------|
| Check the applicable federal rule.<br>Note: The following three questions must be answered first                                      | X |   | * 40 CFR 62.000                                                             |
| MSWLF or TS capacity                                                                                                                  |   |   | > 2.5 MMg                                                                   |
| What are the uncontrolled NMOC emissions from the site?                                                                               |   |   | > 50 Mg/yr                                                                  |
| Has the landfill been constructed, reconstructed, or modified after May 30, 1991?                                                     | X |   |                                                                             |
| Is the LF design capacity > 2.5 MMg or Mm <sup>3</sup> ?                                                                              | X |   |                                                                             |
| Is the MSWLF site an "existing" landfill subject to § 113, Subchapter D (constructed, modified or reconstructed before May 30, 1991)? |   | X |                                                                             |
| Is the 40 CFR NSPS § 60, Subpart XXX checklist included in the application?                                                           |   | X | Landfill is subject and operates in compliance with 40 CFR 62, Subpart 000. |
| Has Tier 2 testing been performed at the site?                                                                                        | X |   |                                                                             |
| Does the landfill have a gas collection and control system (GCCS)?                                                                    | X |   | *Required by NSPS                                                           |
| Has the TCEQ approved the design for the GCCS?                                                                                        | X |   | Date approved: 6/10/2021                                                    |

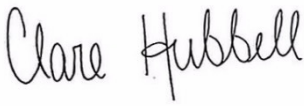
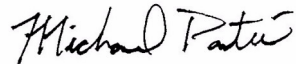
| <b>STANDARD PERMIT 30 TAC § 330.981-995 CHECKLIST</b>                                                         | <b>YES</b> | <b>NO</b> | <b>COMMENTS</b>             |
|---------------------------------------------------------------------------------------------------------------|------------|-----------|-----------------------------|
| Is the Certification filled out correctly and signed?                                                         | X          |           |                             |
| Is the Standard Permit Checklist filled out and attached to the Certification?                                | X          |           |                             |
| Is the site a Type IV or Type IV-AE MSWLF?                                                                    |            | X         |                             |
| Is the site located in a non-attainment county?                                                               |            | X         |                             |
| Is this checklist for a stand alone transfer station (Type V) not located at a landfill?                      |            | X         |                             |
| Does the site have any combustion devices (e.g. flares, stationary engines or turbines, boilers, or heaters)? | X          |           | If YES, list devices: Flare |

| <b>ESTIMATED EMISSIONS</b>                                            |                                                                                           |               |              |              |              |              |              |               |              |               |              |                        |              |                         |              |                       |              |
|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------|--------------|--------------|--------------|--------------|--------------|---------------|--------------|---------------|--------------|------------------------|--------------|-------------------------|--------------|-----------------------|--------------|
| <b>EPN / Emission Source</b>                                          |                                                                                           | <b>VOC</b>    |              | <b>HAPs</b>  |              | <b>NOx</b>   |              | <b>CO</b>     |              | <b>PM</b>     |              | <b>PM<sub>10</sub></b> |              | <b>PM<sub>2.5</sub></b> |              | <b>SO<sub>2</sub></b> |              |
|                                                                       |                                                                                           | <b>lbs/hr</b> | <b>tpy</b>   | <b>lb/hr</b> | <b>tpy</b>   | <b>lb/hr</b> | <b>tpy</b>   | <b>lbs/hr</b> | <b>tpy</b>   | <b>lbs/hr</b> | <b>tpy</b>   | <b>lbs/hr</b>          | <b>tpy</b>   | <b>lbs/hr</b>           | <b>tpy</b>   | <b>lbs/hr</b>         | <b>tpy</b>   |
| <b>New Emissions</b>                                                  |                                                                                           |               |              |              |              |              |              |               |              |               |              |                        |              |                         |              |                       |              |
| RECYCLING / Pavement Recycling                                        |                                                                                           |               |              |              |              |              |              |               |              | 0.12          | 0.51         | 0.12                   | 0.51         | 0.12                    | 0.51         |                       |              |
| <b>Revised Emissions</b>                                              |                                                                                           |               |              |              |              |              |              |               |              |               |              |                        |              |                         |              |                       |              |
| LANDFILL                                                              | Landfill Gas Surface Emissions, Particulates From Equipment, And Earth Moving (Fugitives) | 2.27          | 9.96         | 0.80         | 3.51         |              |              |               |              | 13.49         | 34.29        | 4.25                   | 7.20         | 0.24                    | 0.63         |                       |              |
|                                                                       | Landfill Gas Surface Emissions (Non-Fugitives)                                            | 6.82          | 29.88        | 2.40         | 10.53        |              |              |               |              |               |              |                        |              |                         |              |                       |              |
| LFGFLARE / Open Flare                                                 |                                                                                           | 0.05          | 0.22         | 0.49         | 2.14         | 4.08         | 17.87        | 18.60         | 81.47        | 1.02          | 4.46         | 1.02                   | 4.46         | 1.02                    | 4.46         | 7.99                  | 34.98        |
| <b>Existing/Unchanged Emissions</b>                                   |                                                                                           |               |              |              |              |              |              |               |              |               |              |                        |              |                         |              |                       |              |
| TANKS / Summary of Tanks                                              |                                                                                           | <0.01         | <0.01        | <0.01        | <0.01        |              |              |               |              |               |              |                        |              |                         |              |                       |              |
| LEACHPOND / Leachate Pond(s)                                          |                                                                                           | <0.01         | <0.01        | <0.01        | <0.01        |              |              |               |              |               |              |                        |              |                         |              |                       |              |
| TIRE SHREDDING / Particulate Emissions From Tire Shredding Operations |                                                                                           |               |              |              |              |              |              |               |              | 1.35          | 5.06         | 1.35                   | 5.06         | 1.35                    | 5.06         |                       |              |
| MULCHING / Particulates From Mulching Operations                      |                                                                                           |               |              |              |              |              |              |               |              | 0.08          | 0.35         | 0.08                   | 0.35         | 0.08                    | 0.35         |                       |              |
| <b>TOTAL EMISSIONS (TPY):</b>                                         |                                                                                           |               | <b>40.07</b> |              | <b>16.18</b> |              | <b>17.87</b> |               | <b>81.47</b> |               | <b>44.67</b> |                        | <b>17.58</b> |                         | <b>11.01</b> |                       | <b>34.98</b> |
| <b>MAXIMUM OPERATING SCHEDULE: Hours/Year</b>                         |                                                                                           |               |              |              |              |              |              |               |              |               |              |                        |              |                         |              |                       | 8,760        |

Note: Except for hazardous air pollutants, fugitive Emissions are not counted towards major source limits for this site. No single HAP exceeds 10 tpy.

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|                      | TECHNICAL REVIEWER                                                                | PEER REVIEWER                                                                      | FINAL REVIEWER                                                                      |
|----------------------|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| <b>SIGNATURE:</b>    |  |  |  |
| <b>PRINTED NAME:</b> | Ms. Clare Hubbell                                                                 | Ms. Trishia McDonald, Team Leader                                                  | Mr. Michael Partee, Manager                                                         |
| <b>DATE:</b>         | July 8, 2025                                                                      | July 8, 2025                                                                       | July 9, 2025                                                                        |