

Facility Name: **Chesser Island Road Landfill**
 City: Folkston
 County: Charlton
 AIRS #: 04-13-04900008

Application #: TV-19000
 Date Application Received: June 8, 2009
 Permit No: 4953-049-0008-V-02-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Chesser Island Road Landfill** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Chesser Island Road Landfill
2. Parent/Holding Company Name: Chesser Island Road Landfill, Inc.
3. Previous and/or Other Name(s): None
4. Facility Location

Hwy 121 South/Chesser Island Road
Folkston, Georgia 31537, Charlton County
5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

Waste Management (WM) owns a large tract of land that contains, essentially, two landfills. One is active and the other, located a mile from it, across some woods, is their old inactive landfill. The two landfilling areas, including the land between the two areas, are on one parcel of land that is owned by Waste Management. Based on previous decisions, and since these two landfills are under common control, EPD has determined that the landfills are one site for Title V. WM also believes them to be one site.

There are no other site determination issues regarding this facility.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
4953-049-0008-V-01-0	December 8, 2004	Initial Title V Permit
Off-Permit Change	March 6, 2008	To replace an open flare
Off-Permit Change	August 22, 2008	Use of pug mill for solidification process

D. Process Description

1. SIC Codes(s): 4953

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

Chesser Island Road Landfill processes Municipal Solid Waste (MSW) and other wastes; the processed waste is deposited into the landfill. Through anaerobic activity, the landfill produces landfill gas (LFG).

3. Overall Facility Process Description

Chesser Island Road Landfill receives, manages, and disposes of municipal solid waste, including construction & demolition (C & D) waste, and soil. The waste is dumped directly on an active cell of the landfill and spread out; soil cover is applied and then waste and soil is compacted.

The facility also has a solidification process, which it uses to treat liquid waste prior to deposition in the landfill, by mixing it with fly ash (solidification agent) in a pug mill. The solidified material is transported to an active cell for disposal.

Chesser Island Road Landfill has two separate landfilling areas:

1. Phase 1 & 2 "the closed site." This area no longer receives waste and was completely capped as of July 15, 2003.
2. Phase 3 "the active site," which is currently receiving municipal solid waste.

The waste deposited in the landfill decomposes over time and produces gases termed "landfill gas" (LFG). The LFG is composed primarily of methane and carbon dioxide with small amounts of Nonmethane Organic Compounds (NMOC) and inorganic compounds. Because the NMOC emitted from the landfill is currently calculated to be less than 50 megagrams per year, based upon Tier 2 calculations, the facility is not required to have a gas collection and control system (GCCS) per NSPS. When the NMOC emissions exceed 50 Mg/yr, calculated in accordance with federal rules, the

facility will be required to install a GCCS that meets the requirements of NSPS Subpart WWW and the MACT (Subpart AAAA).

The facility does have a system to collect and destroy some of the landfill gas (LFG) in order to minimize odorous. This includes a collection system on the closed landfill site. The facility had been using an open flare to control LFG emissions, but it was shut down in 2009 because of declining gas flows. The facility has 12 passive flares at the active landfill site, which are used from time to time, as needed. All gas collection and control systems have been installed and operated voluntarily.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This facility is a minor source in respect to PSD. Potential emissions of each criteria pollutant are below 250 tons per year. Nonattainment NSR does not apply because the source is located in an area deemed to be in attainment for all pollutants.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓			✓
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The Landfill MACT, 40 CFR Part 63 Subpart AAAA, published in the Federal Register (Vol. 68, No. 11/Thursday, January 16, 2003), indicates that the MACT is applicable to

each area source MSW landfill with a design capacity greater than or equal to 2.5 million Mg and 2.5 million m³ and that has estimated uncontrolled NMOC emissions exceeding 50 Mg/yr.

Per a semiannual report dated January 30, 2009, the estimated NMOC emissions, using the Tier 2 equation, are 47.3 Mg for 2008. Therefore, the MACT standard is not applicable to this landfill facility at present. Although the design capacity is more than the Subpart WWW applicability threshold, the NMOC emissions are less than the threshold which would require a GCCS.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Applicable rules and regulations specified in Permit No. 4953-049-0008-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

C. Compliance Status

The facility did not submit a form F.2, Compliance Plan for Non-Compliant Emission Unit or Group with the renewal Title V application or application update. This indicates that the source believes itself to be in compliance with all Air Quality Rules as of the application dates.

D. Operational Flexibility

There were no operational flexibility requests in the Title V renewal application.

E. Permit Conditions

Facility wide Condition 2.2.1, included in Section 2.2 of the initial Title V permit, indicated the facility's subjection to Subpart A-“General Provisions” of the Federal Rule Standards of 40 CFR 60, 40 CFR 61 and 60 CFR 63. Also, the facility is subject to the provisions of 40 CFR 60 Subpart WWW- the NSPS for Municipal Solid Waste Landfills; 40 CFR 61 Subpart M- the NESHAP for Asbestos; and 40 CFR 63 Subpart AAAA - the NESHAP for Municipal Solid Waste Landfills. This condition is replaced by Conditions No. 2.2.1, 2.2.2 and 2.2.3 in the renewal permit, which subjects the facility to the same rules and regulations, but with a separate condition for each federal rule, as indicated below. [This is now the way these conditions are found in most landfill permits.]

New Condition 2.2.1 establishes the applicability to the facility of the Federal Rule Standards of 40 CFR 60 Subpart A, General Provisions, and Subpart WWW, the NSPS for Municipal Solid Waste Landfills. This replaces Conditions 2.2.1a and 2.2.1b in the initial Title V permit.

New Condition 2.2.2 establishes the applicability to the facility of the Federal Rule Standards of 40 CFR 61 Subpart A, General Provisions, and Subpart M, the NESHAP for Asbestos. This replaces Conditions 2.2.1c and 2.2.1d in the initial Title V permit.

New Condition No. 2.2.3 establishes the potential applicability to the facility of 40 CFR Part 63 Subpart A and Subpart AAAA. These rules will only be applicable to the facility if it operates as a bioreactor or is required by the NSPS to install a GCCS. This replaces Conditions 2.2.1d and 2.2.1e in the initial Title V permit.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility accepts municipal solid waste and other waste streams, which are deposited into the landfill, compacted and covered with soil or another medium to minimize emissions of odors and PM. Once the waste is covered, the material begins to decompose. Once the oxygen is used up, the decomposition becomes mainly anaerobic; landfill gas (LFG) is generated from then on. LFG is mostly made up of methane and CO₂ but also contains small concentrations of many different “nonmethane” organic gaseous compounds (NMOC), as well as some inorganic compounds. Subpart WWW regulates the NMOC emissions generated from this decomposing process.

The facility has installed a non-regulated gas collection and control system (GCCS) to collect and destroy methane and other compounds, and to control odor, using one open flare. There are also 12 passive flares on site.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements*		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
LF	Landfill [Phase 1 & 2: Closed site] And [Phase 3: Active site]	40 CFR Part 60, Subpart A 40 CFR Part 60, Subpart WWW 40 CFR Part 61, Subpart A 40 CFR Part 61, Subpart M 40 CFR Part 63, Subpart A** 40 CFR Part 63, Subpart AAAA** GA 391-3-1-.02(2)(n)	3.3.1, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 6.1.7, 6.2.1 through 6.2.15	None OF1/PF2	Gas collection and control System(s) [GCCS(s)] with: One Open Flare (for closed site) and 12 Passive Flares (for active site)*** [All Installed and operated voluntarily]
SP	Solidification Process	GA 391-3-1-.02(2)(b) GA 391-3-1-.02(2)(e) GA 391-3-1-.02(2)(n)	3.4.2, 3.4.3, 3.4.4, 3.5.1, 3.5.2	BH	Silo Baghouse

*Generally applicable requirements contained in this permit may also apply to emission units listed above.

** 40 CFR Part 63 requirements are not currently applicable, but could become applicable during the permit term if the facility is required by Subpart WWW to install a GCCS or if it becomes a bioreactor.

*** The facility had operated the open flare to burn emissions from the GCCS of the closed landfill site, but it was shut down in 2009.

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 4953-049-0008-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Note that Chesser Island Road Landfill has a design capacity greater than 2.5 million cubic meters (m³) or 3.27 million cubic yards (yrd³), so the facility is currently subject to NSPS, 40

CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills. The facility has completed a Tier 1 NMOC Emission Rate Report each year, calculating the NMOC emission rate to be less than 50 Mg per year, based on default parameters and waste disposal rates, until 2003. However, for the year 2004 the NMOC emission rate exceeded the 50 Mg per year threshold using Tier 1 (95.81 Mg/yr). Tier 2 testing was conducted in June 2004, which found that the site-specific NMOC concentration was 642 parts per million by volume as hexane. Using the Tier 2 equation, the facility estimated NMOC emissions to be 11.4 Mg for the year 2005, less than the 50 Mg/yr threshold. Therefore, the facility was not yet required to install and operate an NSPS GCCS.

The facility is required to recalculate the NMOC emission rate annually, per § 60.752(b)(1), using the procedure specified in § 60.754(a)(3), until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, or the landfill is closed. Using the Tier 2 equation, the facility estimated NMOC emissions to be 30.7 Mg for 2007 and 47.3 Mg for 2008. Since Tier 2 testing is valid for only five years, a new test had to be done by June 20, 2010.

The facility conducted Tier 2 testing on November 18, 2009, the site-specific NMOC concentration was 473.2 parts per million by volume as hexane. Using this value, the facility estimated the NMOC emission to be 45.4 Mg for the year 2009, per a report received on April 28, 2010. While there was some question about the emissions for the year 2009. As stated in a Division letter dated May 05, 2010, the Division now agrees that the facility has demonstrated that its NMOC emissions rate is below 50 megagrams in 2009. Therefore, the facility is not required to submit a GCCS design plan or conduct Tier 3 testing, at this time. The next NMOC report is due January 30, 2011.

Once the calculated annual emission rate is equal to or greater than 50 megagrams per year, using the NMOC concentration determined by Tier 2 testing, the facility has the option to conduct Tier 3 testing to determine a site-specific methane generation constant (k) and recalculate the NMOC emission rate. If recalculation of the NMOC emission rate using Tier 3 values shows the NMOC emission rate is less than 50 megagrams/year, annual reporting must be resumed. However, if it is equal to or greater than 50 megagrams/year, Subpart WWW requires that a GCCS must be put into place. [Note: the Tier 3 testing has never been done in Georgia and is not expected to be done here.]

Geosyntec Consultants, representing the facility, has submitted the following information, by their email dated February 2, 2010, regarding the operation of flares at this landfill.

“Gas System (active and passive): Since Chesser Island is not yet subject to the control requirements of Subpart WWW, all gas systems to date have been voluntary systems. At the time of the Title V renewal application, an active gas system, including an open flare, was in place in the closed site. The active site had 12 passive flares connected to the leachate collection system (at riser pipes) to control odors; however, only five of these flares have sufficient gas to burn. Both the active open flare and the passive flares described above are included in the renewal Title V application in section D10. The emissions included in the application take into account both the open flare and passive flares. The total flow to the open/passive flares was calculated based on what was projected from a Land GEM model for the site along with assumed

75% collection efficiency. As expected, the closed site began experiencing declining gas flows. Once the flow dropped to the low end of the flare operating range, it became problematic to keep using the voluntary active GCCS and open flare, so it was shut down in 2009. WM is currently in the process of installing four additional passive flares at the closed site to mitigate odors from any remaining gas and minimize pressure on the cap. These four additional passive flares were not included in the renewal application.

The passive flares at the site are Solar Spark Vent Flares, Model CF5, which are manufactured by Landfill Services Corporation. The flares have a range of 2 to 90 scfm, although the flares normally require modifications to reach the upper end of the range. There is no blower or gas moving equipment on the flares. Landfill gas is moved through the flare because of the positive pressure from the landfill. They operate as long as there is landfill gas flowing. The flares are not equipped with flow meters, so actual flows can only be approximated. The flares do not have any pilot, instead they rely on a sparking mechanism powered by a solar charged battery that continuously sparks every 1 to 2 seconds. Additional information about the passive flares is available on the manufacturer's web site at: <http://www.landfill.com/description.htm>.

Once the decision is made to install a GCCS, the facility must submit a GCCS design plan prepared by a professional engineer to the Division within one (1) year after the first annual report in which the emission rate equals or exceeds 50 Mg per year. The Permittee is required to install a GCCS within 30 months after that report. Since the application does not indicate that the facility will opt to perform Tier 3 NMOC emission testing, it is expected that a NSPS GCCS will be required in the near future.

The Permittee will be required to submit an application for a permit amendment for installation of that GCCS. After the application is reviewed, an amended Title V permit will be issued with conditions designed to ensure the collection system meets the requirements of the NSPS and that it operates optimally.

Geosyntec Consultants has also submitted the following information, by their email dated February 2, 2010, regarding the operation of the solidification process:

“Solidification Process: Chesser Island accepts some non hazardous special waste that does not pass the paint filter test. This liquid waste is solidified before placement in the landfill by mixing with fly ash, which itself must be hydrated before placement in the landfill. This information was included in the 2003 applications for the initial Title V Permit issued December 8, 2004. In August 2008, Chesser Island submitted a notification letter for an off permit change for the solidification process. The process was improved by having the solidification process done in a pug mill instead of using open basins. The process can be described as follows:

The process uses a solidification agent (SA), namely waste fly ash, to be combined with liquid waste or other liquids such as water or leachate, to both hydrate the fly ash and to thicken up the liquid waste to allow it to pass the paint filter test and be placed in the landfill. The SA is trucked in and transferred pneumatically to a silo with the transfer process being controlled with a baghouse on the silo. The loading of the SA into the pug mill and the solidification mixing process are both done in the enclosed pug mill virtually eliminating particulate matter emissions from this part of the process. The pug mill hopper is located directly beneath a silo to facilitate

gravity feed of the solidification agent. Electric transfer pumps are utilized to convey leachate or liquid wastes from above ground storage tanks and/or solidification basins via dual contained HDPE piping into the mixing hopper of the pug mill. The solidified but moist material from the pug mill goes directly into dump trucks, which in turn, transport the material to the lined area of the landfill for disposal.

Occasionally, a pump is used to transfer the liquid waste from incoming trucks to the above ground storage tank. This Grainger model number 3P712 trash pump is powered by an eight horsepower gasoline fired engine. The pump, ordered in 2006, is portable and moved to indoor storage at the end of any day in which is used.

With the revision of the solidification process, emissions have been significantly reduced. In the notification letter, particulate matter emissions were documented as 0.052 tons per year (actual) and 0.078 tons per year (potential). With most of the process being enclosed, the only emissions are from the baghouse on the SA silo. The solidification process was included in the renewal application in section D8.”

The emissions from the solidification process are not significant as compared to landfilling operations. PM is emitted from this process from the handling of the solidification agent, the mixing of the wet waste and the solidification agent, and from the solidification agent silo baghouse. The solidification process (Emission unit ID No. SP) is subject to Georgia Rule (e) and visible emission Rule (b). The application indicates that the maximum actual emissions in units of standard are 0.06 lb/hour as compared to the emission limit of 55 lb/hr, based on the Rule (e) input rate. The application also indicates that the actual emissions are only 0.08 tpy, which are insignificant. Under Georgia Rule 391-3-1-.02(2)(b) “Visible Emissions,” the facility is not allowed to emit gases, from any air contaminant source, the opacity of which is equal to or greater than forty (40) percent. This rule is also applicable to the silo baghouse with APCD ID. No. BH. Since this process emits fugitive emissions, it is also covered by Rule (n).

Also, all fugitive emissions from the land filling operations and solidification process are subject to Georgia Rule 391-3-1-.02(2)(n) “Fugitive Dust.” Per this rule, the Permittee must not emit any fugitive emissions, which exhibit opacity equal to or exceeding 20 percent.

Emission and Operating Caps:

The facility is not subject to any emission or operating caps.

D. Compliance Status

According to their Title V application, the facility is currently operating in compliance.

E. Operational Flexibility

None applicable.

F. Permit Conditions

The permit conditions that were incorporated in Section 3 of the initial Title V Permit had been developed out of the requirements of the provisions found in the Federal Rule Standards and Georgia Rules for Air Quality Control. The new permit conditions that are incorporated into Section 3.3 of the Title V Renewal Permit have also been developed out of the requirements of the provisions found in the federal and state rules.

New Condition 3.3.1 establishes the bioreactor avoidance requirements, per 40 CFR 63 Subpart AAAA. This is the same as existing permit Condition 3.3.2. Note that existing Condition 3.3.1 has been revised and moved to Section 6.2, as Condition No. 6.2.1.

Conditions No. 3.4.1 and 3.4.2 re-state the Rule (n) fugitive dust rule, to assure that the facility operators understand that they must take all reasonable precautions when moving dirt, and also not exceed the 20% opacity limit for fugitive dust. These are the same as existing Conditions 3.4.1 and 3.4.2 in the initial Title V permit.

New Condition 3.4.3 limits the PM emissions from the solidification process (Emission Unit ID No. SP), based on Georgia Rule (e).

New Condition 3.4.4 limits the visible emissions from the solidification process (Emission Unit ID No. SP), to 40 percent opacity based on Georgia Rule (b).

Since the fugitive emissions from the solidification process are also subject to Georgia Rule (n), this process is included in the existing Conditions No. 3.4.1 and 3.4.2, which limit fugitive emissions.

New Conditions No. 3.5.1 and 3.5.2 are included to assure that the facility operators understand that they must take all reasonable precautions when operating the solidification process, so that emissions do not violate Georgia Rule (b).

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Testing requirements specified in Permit No. 4953-313-0131-V-01-0 are discussed in the initial Title V permit narrative for that permit. Please refer to that narrative.

Note that Chesser Island Road Landfill is subject to Subpart WWW, but not yet required to operate the CGGS and flares per NSPS, and thus considered an uncontrolled landfill, per Subpart WWW. Subpart WWW and this permit contain specific requirements to determine NMOC emissions from an uncontrolled landfill. Conditions No. 4.2.1 through 4.2.5 provide the procedures to be followed to calculate the NMOC emissions. Note that Conditions 4.2.1 through 4.2.4 are similar to existing permit Conditions No. 4.2.1 through 4.2.4. Condition No. 4.2.5 is a new condition included in the renewal permit and existing Condition 4.2.5 is deleted since it referred to Condition 3.2.1 which has been revised and moved to Section 6.2.

Existing Condition No. 4.2.3 has been shortened. The facility has already exceeded the 50 Mg per year NMOC emission rate using the Tier 1 procedure and carried out Tier 2 testing to determine the site-specific NMOC concentration. The facility is now estimating NMOC emissions using Tier 2. Therefore, the Tier 1 testing method has been removed from this condition.

Condition No. 4.2.4, which is similar to existing Condition 4.2.4, states the sampling procedure to be followed for collecting samples to determine the NMOC concentration (C_{NMOC}). This condition has been updated.

Existing permit Condition No. 4.2.5 has been revised to include the date by which the facility must conduct retesting to determine the site-specific Non-Methane Organic Compounds (C_{NMOC}) concentration of the landfill gas. This test must be performed every five years, to retain authorization to calculate the NMOC emissions rate using Tier 2 equations. Tier 2 testing has been conducted on June 20, 2005 and November 18, 2009. The 2009 results of the latest testing indicated a NMOC conc. of 473.3 ppm as hexane. Revised Condition 4.2.5 requires the Permittee to conduct a retest to determine C_{NMOC} no later than November 18, 2014.

Note that since the flares installed are voluntary and are not required by Subpart WWW, these will not be subject to any performance specifications or testing requirements of Subpart WWW.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

None applicable.

Note that the flares installed are voluntary and are not required to be operated per Subpart WWW. They therefore will not be subject to any performance specifications or monitoring requirements of Subpart WWW.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Record keeping and reporting requirements specified in initial Title V Permit No. 4953-049-0008-V-01-0 are discussed in the initial Title V permit narrative for this permit. Most of the discussion still applies, so please refer to this narrative. Also, most of these conditions have been carried over from the initial Title V permit.

Condition No. 6.1.7 details the excess emissions, exceedances, excursions, and other information that must be reported for each period. The only excursion defined is failure to follow the dust suppression plan required in Condition No. 6.2.10. This is similar to existing permit Condition 6.1.7.

New Condition No. 6.2.1 requires the Permittee to submit the NMOC emission rate annually by January 30 of each calendar year. If the NMOC emission rate exceeds 50 Mg/yr, the Permittee must either recalculate emissions by using the Tier 3 procedure or submit a GCCS design plan, in accordance with the Subpart WWW requirements. This is similar to existing Condition No. 6.2.2 and existing Condition 3.3.1.

In case a Tier 3 value is determined, New Condition No. 6.2.2 requires the Permittee to submit NMOC emission reports, based on the Tier 3 procedure, until the emissions exceed 50 Mg/yr.

Condition 6.2.3 requires the Permittee to submit a GCCS design plan if and when the annual emission rate exceeds the threshold, based on the Tier 3 procedure.

Condition 6.2.4 exempts the Permittee from needing to submit annual NMOC emission reports, once the landfill is controlled by a GCCS in accordance with Subpart WWW. This is the same as existing permit Condition 6.2.5.

Condition No. 6.2.5 requires keeping on-site records of the maximum design capacity, amount of solid waste in place, and the year-by-year acceptance rates as required by 40 CFR 60.758(a). This is the same as existing permit Condition 6.2.6.

Per Condition No. 6.2.6, the facility must comply with the applicable provisions and reporting requirements in 40 CFR 61 Subpart M, which are found in § 61.154. The facility must also maintain records containing the quantity and location of all the asbestos placed in the landfill. The facility is responsible for reporting any discrepancies in the quantity of waste received and

to maintain these records for two years, per § 61.154. This is the same as existing permit Condition 6.2.8.

Per Condition No. 6.2.7, the Permittee is authorized to exclude any areas of deposited asbestos or other nondegradable waste from being part of a required Subpart WWWW GCCS. This is the same as existing permit Condition 6.2.7.

Per Condition No. 6.2.8, the Permittee is authorized to exclude any nonproductive area of the landfill from being part of a required 40 CFR 60 Subpart WWWW GCCS, provided it contributes less than 1 percent of the total amount of NMOC emissions from the landfill. This is a new condition.

Once the facility is closed, the records must be submitted to the Administrator of the asbestos NESHAP program, per Condition No. 6.2.9. This is the same as existing permit Condition 6.2.9.

Condition No. 6.2.10 requires the Permittee to implement the Dust Suppression Plan, already approved by the Division, to assure compliance with Georgia Air Quality Rule (n) for fugitive dust. Failure to follow the procedures of the Dust Suppression Plan must be reported as an excursion, as required by Condition No. 6.1.7. This is similar to existing Condition 6.2.10.

Condition 6.2.11 requires that the facility notify the Division if the landfill begins adding liquids, other than the leachate, to the landfill waste mass. This requirement is not a part of Subpart AAAA, but it will give the Division an indication that the landfill may become a bioreactor at some point. This is similar to existing Condition 6.2.14.

Condition 6.2.12 requires that the facility keep calculations of the waste mass moisture content if the landfill adds liquids other than leachate to the landfill. These calculations are to be used to demonstrate that the landfill is not a bioreactor. If so, it would be subject to the bioreactor control requirements of Subpart AAAA. The requirement, in this condition, to update the calculations quarterly, was added by EPD since Subpart AAAA did not provide guidance on how often this should be updated. This is same as existing Condition 6.2.12.

Condition 6.2.13 requires that the facility notify the Division if the moisture content of the waste mass exceeds 40 percent by weight. If the moisture content exceeds 40 percent, the facility becomes subject to the bioreactor requirements of Subpart AAAA. This is the same as existing Condition 6.2.13.

Condition 6.2.14 requires the Permittee to notify the Division when there is any increase in the design capacity of the landfill. This requirement is not a part of Subpart WWWW, but it is useful to know when there is an increase in the design capacity of the landfill. This is a new condition.

Condition 6.2.15 requires the Permittee to submit a Landfill Closure Report after it stops accepting waste. This is the same as existing Condition 6.2.11.

VII. Specific Requirements

A. Operational Flexibility

None Applicable.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

None Applicable.

E. Short-Term Activities

The applicant did not include short-term activities in their Title V renewal application. However, Condition 7.6.1, regarding maintenance of records for construction of landfill cell and capping thereof, of the initial Title V permit, has been included in the renewal permit. These short-term activities are normal at a landfill.

F. Compliance Schedule/Progress Reports

None Applicable.

G. Emissions Trading

None Applicable.

H. Acid Rain Requirements

None Applicable.

I. Stratospheric Ozone Protection Requirements

Chesser Island Road Landfill has indicated in their renewal application that the landfill does have air conditioners or refrigeration equipment that uses CFC's, HFC's or other stratospheric ozone depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B. Therefore, the landfill is subject to 40 CFR Part 82, Subpart A-“Production and Consumption Control.”

The Title V permit application also indicates that the facility does not have any air conditioner or piece of refrigeration equipment that contains a refrigerant charge of greater than 50 lbs, but the facility personnel do maintain, service, repair or dispose of any motor vehicle air conditioners (MVAC's) or appliances. Therefore, the facility is also subject to 40 CFR 82, Subpart B-“Servicing of Motor Vehicle Air Conditioners.”

J. Pollution Prevention

None Applicable.

K. Specific Conditions

None Applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.