

TITLE V APPLICATION REVIEW

Facility Name: Pine Ridge Municipal Solid Waste Landfill

City: Griffin

County: Butts

AIRS #: 04-13-035-00010

Application #: TV- 10638

Date Application Received: May 1, 1998

Date Application Deemed

Administratively Complete: July 28, 1998

Date of Draft Permit:

Permit No: 4952-035-0010-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Kevin White	John Yntema
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ISMP	Bradley Belflower	Larry Webber
TOXICS	N/A	N/A

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V operating permit. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being proposed pursuant to: (1) Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to the Pine Ridge Municipal Solid Waste 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Pine Ridge Municipal Solid Waste Landfill
2. Parent/Holding Company Name: Republic Services of Georgia Limited Partnership
3. Previous and/or Other Name(s): None Known
4. Facility Location: 105 Bailey Jester Road
Griffin, Georgia 30223 (Butts County)
5. Attainment or Non-attainment Area Location

Area is designated as an attainment area for all criteria pollutants.

6. Class I Area Impacts

This facility is not located within 100 km of a Class I Area.

B. Site Determination

There are no applicable issues with regard to the site determination. There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
N/A	N/A	N/A	N/A

Table 2: Comments on Specific Permits

Permit Number	Comments
N/A	N/A

D. Process Description

1. SIC Code(s)

Major - 4953 (Operation of a municipal solid waste landfill)
Other - None

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2. Description of Product(s): This facility does not have final products. The Pine Ridge Landfill processes general waste.
3. Overall Facility Process Description

The Pine Ridge Landfill receives solid waste. The waste is deposited directly into a landfill cell, compacted and then covered with fill dirt or an alternative cover on a daily basis.

4. Overall Process Flow Diagram (optional)

A landfill process flow diagram was not provided in the Pine Ridge Landfill’s Title V application.

E. Regulatory Status

1. PSD/NSR: The facility is considered a minor source with respect to PSD rules.
2. Title V Major Source Status by Pollutant

Table 3: 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	yes			T
PM ₁₀	yes			T
SO ₂	yes			T
VOC	yes			T
NO _x	yes			T
CO	yes			T
TRS	yes			T
H ₂ S	yes			T
Individual HAP	yes			T
Total HAPs	yes			T

* year of maximum anticipated emissions is 2016 based on EPA Landfill Gas Model output (provided in Title V Permit application)

3. MACT Standards

The Pine Ridge Landfill is not currently subject to any MACT standards.

4. Program Applicability

Program Code	Applicable (Yes/No)
Program Code 6 - PSD	No

Program Code	Applicable (Yes/No)
Program Code 8 - Part 61 NESHAP	Yes
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:

This facility currently does not have any emission or operating limits.

B. Applicable Rules and Regulations

! Rules and Regulations Assessment - The facility is currently subject to 40 CFR Part 60, Subpart WWWW NSPS for Municipal Solid Waste Landfills. This is because the Pine Ridge Landfill has a design capacity of 13.0 MMyrd³, which exceeds the Subpart WWWW applicability threshold of 3.2 MMyrd³, and the landfill was modified after the May 30, 1991 Subpart WWWW effective date. Using Tier 1, the calculated facility NMOC emission rate was 31.8 Mg per year (1998). The Tier 1 calculated value is below Subpart WWWW's threshold and therefore a landfill gas collection and control system (GCCS) is not required to be installed at this time. To comply with Subpart WWWW, the Pine Ridge Landfill must submit an annual estimate emission rate report.

Once the facility is required by the NSPS to install a GCCS, then the facility must submit a new Title V application. At that point, a Title V Permit will be issued with conditions that ensure the collection system can meet the requirements of the NSPS and that it is operating in accordance with Subpart WWWW's requirements.

Because the Pine Ridge Landfill Title V application denotes that they accept asbestos, the facility is subject to 40 CFR Part 61, Subpart M, NESHAP. As long as the Pine Ridge Landfill remains active it is required to comply with the provision of 40 CFR 61.154 - "Standards for Active Waste Disposal Sites" including all reporting and record keeping requirements if asbestos waste has been accepted. Upon closure, the facility will be required to comply with 40 CFR 61.151 - "Standards for Inactive Waste Disposal Sites for Asbestos Mills and Manufacturing and Fabricating Operations," if asbestos waste has been accepted.

The facility's leachate storage tank may be subject to 40 CFR Part 60, Subpart Kb for Volatile Organic Liquid Storage Vessels. The tank cannot be subject to the entire rule due to the low vapor pressure of leachate; however, if the tank is greater than 40 m³ (1,413 ft³) and was constructed, reconstructed, or modified after July 23, 1984, it is subject to 60.116b (a) and (b). 60.116b (a) and (b) require the Permittee to keep readily accessible records showing the dimensions and an analysis showing the capacity of the tank. The Permit contains the above mentioned record keeping requirements associated with Subpart Kb.

Also, the facility is subject to the following Georgia Air Quality Rules:

Georgia Rule 391-3-1-.02(2)(n) Fugitive Emissions

Georgia Rule 391-3-1-.02(3) Sampling

Georgia Rule 391-3-1-.02(5) Open Burning

Georgia Rule 391-3-1-.02(6) Source Monitoring

Georgia Rule 391-3-1-.02(8) New Source Performance Standards

Georgia Rule 391-3-1-.02(9) Emission Standards for Hazardous Air Pollutants

! Emission and Operating Standards -

Georgia Rule 391-3-1-.02(2)(n) Fugitive Emissions

This rule requires the facility to minimize fugitive dust from the facility. This includes using water chemicals for controlling dust on construction operations, grading of roads, and the clearing of land; covering at all times, when in motion, open bodied trucks transporting material likely to give rise to airborne dust; application of suitable material to dirt roads, materials, stockpiles, and other similar surfaces.

Georgia Rule 391-3-1-.02(3) Sampling

Any sampling, computation, and analysis to determine the compliance of any of the emission limits or standards must be in accordance to the Georgia-DNR, Procedures for Testing and Monitoring Sources of Air Pollutants, or by method or procedure approved by the Director. The facility must provide safe and adequate sampling ports, and the facility must operate at maximum capacity during test periods.

Georgia Rule 391-3-1-.02(5) Open Burning

This regulation sets the requirements for open burning of vegetative matter that is generated from the site and defines the rules necessary for any ground clearing operations. This operation must still be conducted in accordance with any local regulations.

Georgia Rule 391-3-1-.02(6) Source Monitoring

The facility must meet monitoring and related requirements specified in the applicable standard, unless the Director specifies additional or more stringent requirements, in which case all requirements must be met. Also, this section gives EPD the authority to require a company to install, maintain, and use emission monitoring devices to sample emissions.

Georgia Rule 391-3-1-.02(8) New Source Performance Standards

The facility is subject to the following NSPS that the State of Georgia adopted, by reference: 40 CFR, Part 60, Subpart WWW-Municipal Solid Waste Landfills.

Georgia Rule 391-3-1-.02(9) Emission Standards for Hazardous Air Pollutants

The facility is subject to the following NESHAP that the State of Georgia, by reference: 40 CFR, Part 61, Subpart M-Emission Standard for Asbestos (inc. work practices).

C. Compliance Status

The facility did not submit a Section 11.10 form with the initial Title V application, dated April 22, 1998. This indicates that the source believes itself to be in compliance with all Air Quality Rules as of the application date.

D. Operational Flexibility

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

E. Permit Conditions

All of the permit conditions for the facility will be facility wide conditions.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility accepts municipal solid waste from the local area and deposits it into the ground. This waste is then compacted and covered daily with a medium to reduce the chance of any particulates becoming airborne. Once the waste is covered, the material starts a natural process of decomposing. The emissions generated from the decomposing process are regulated by Subpart WWW.

B. Equipment List for the Process

The facility has a landfill that is represented with Emission Unit ID Number LF-01.

C. Equipment & Rule Applicability

! Emission and Operating Caps - The facility is not subject to any emission or operating caps.

! Applicable Rules and Regulations -

Rules and Regulations Assessment: Since the Pine Ridge Landfill is above the 3.2 MMyrd³ capacity threshold, it is subject to the NSPS Subpart WWW. This regulation requires that the facility calculate and report an annual emissions estimate; once the emission estimate exceeds 50 Mg of NMOC per year, then a control and collection system is required. Based on the results of the calculated Tier 1 NMOC emissions (31.8 Mg/year), the facility is required to continue submitting an annual estimate of the emission rate report as provided in 40 CFR 60.757(b)(1).

Emission and Operating Standards: The facility is subject to the Asbestos NESHAP because they accept this type of waste at the landfill. The Asbestos NESHAP is a work practice standard that contains reporting and record keeping requirements. The NESHAP also denotes how areas that accept asbestos must not emit visible emissions or must be covered by the end of the day, and what kind of signage and barriers must be placed around the area.

The facility may also be subject to NSPS Subpart Kb for storage vessels containing volatile organic liquids (VOL). If subject, a tank would be exempt from all parts of this rule except 60.116b(a) and (b) which require record keeping of the dimensions and capacity of the storage vessel.

D. Compliance Status

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

E. Operational Flexibility

Not Applicable

F. Permit Conditions

The permit conditions that were incorporated in Section 3 of the Title V application have been developed to meet all of the requirements of the NSPS. There is not an existing permit to incorporate into this section.

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

A. General Testing Requirements

This permit specifies that a performance test may be required to determine compliance with the emission limits in Part 4.0, and the test methods to be used to determine compliance are listed. A general condition to require notification of any test and for the submission of a test plan is included.

B. Specific Testing Requirements

The Pine Ridge Landfill is subject to 40 CFR 60 Subpart WWW. Subpart WWW requires that uncontrolled landfills submit annual Nonmethane Organic Compounds (NMOC) emission rate estimate reports. The landfill is not required to submit the annual emission rate estimate if the landfill is controlled and the control system is operating properly. Conditions 4.2.1 through 4.2.4 of this permit contain the procedures for calculating the NMOC emission rate. These procedures are identical to the procedures in Subpart WWW.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)

A. General Monitoring Requirements

This permit specifies that any monitoring systems installed should be in continuous operation and that downtime due to maintenance should be minimized.

B. Specific Monitoring Requirements

The Pine Ridge Landfill is uncontrolled and is subject to Subpart WWW. Subpart WWW and this permit do not contain any specific monitoring requirements for an uncontrolled landfill.

C. Record Keeping and Reporting Requirements:

As per Title V requirements, records, including identification of any deviations from applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee. This permit does not require a periodic report of deviations since the landfill is uncontrolled and monitoring is necessary.

VI. Other 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 related information to deviations from applicable requirements.

B. Specific Record Keeping and Reporting Requirements

As stated above, the landfill is uncontrolled and subject to Subpart WWW. Subpart WWW requires that landfills submit an annual NMOC emissions rate estimate. If the landfill was controlled and the control system was operating properly the landfill would not be required to submit the annual emission rate estimate. The permit requires that this emission rate estimate be submitted by January 31 of each year unless a collection and control system is installed and operating properly.

If the emission rate estimate submitted to the Division is greater than or equal to 50 megagrams per year, a Collection and Control Plan is required to be submitted within one year. There are two exceptions where the landfill is not required to submit the Collection and Control Plan. (1) If the emission rate calculated using Tier 1 and the landfill chooses to recalculate the emission rate using Tier 2. (2) If the emission was calculated using Tier 2 and the landfill chooses to recalculate the emission rate using Tier 3. If the landfill chooses either of these options and the recalculated emission rate is less than 50 megagrams per year, the landfill will resume submitting annual emission rate estimates. The deadlines for submitting the recalculated emission rate estimates are 180 days for the first exception and one year for the second exception. Regardless of the option used to recalculate the emission rate, if the recalculated emission rate is greater than or equal to 50 megagrams per year, the landfill must submit a Collection and Control Plan within one year of the original emission rate calculation (Section 4.10(1)).

Based on the Pine Ridge Landfill's calculated Tier 1 emission rate, the facility is not required to install a GCCS. However, the facility is required to continue submitting a annual emission estimate report.

The Asbestos NESHAP has several record keeping and recording requirements. These require that the facility maintain waste records from the generators and transporters. The landfill facility must also maintain records containing the quantity and location of all the asbestos placed in the landfill. The landfill is responsible for reporting any discrepancies in quantity of waste received. The Pine Ridge Landfill is responsible for maintaining these records for two years. Once the facility is closed, the records should be submitted to the administrator of the asbestos NESHAP program.

If any facility VOL Storage Vessel has capacity greater than 40 m³ and was constructed, reconstructed, or modified after July 23, 1984, the vessel has two record keeping requirements. These require the facility to maintain a record containing each vessel's dimensions and an analysis of the vessel's capacity. These records shall be maintained for the life of the vessel.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable

B. Alternative Requirements

Application did not specify any alternative operating scenarios.

C. Insignificant Activities

The Pine Ridge Landfill has included three insignificant sources of air pollutants noted in Section 4.10 of the Title V application. These included "Mobile Sources", "Pollution Control", and "Storage Tanks and Equipment." The Pine Ridge Landfill is subject to requirements under Section 111 or 112 of the Federal Act and therefore, should not be on the list of landfill pollution control insignificant activities/units. The other activities/units appear to be appropriate for the insignificant list.

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D. Temporary Sources

Not Applicable

E. Short-Term Activities

Not Applicable

F. Compliance Schedule/Progress Reports

Not Applicable

G. Emissions Trading

Not Applicable

H. Acid Rain Requirements

Not Applicable

I. Prevention of Accidental Releases

Not Applicable

J. Stratospheric Ozone Protection Requirements

Not Applicable

K. Pollution Prevention

Not Applicable

L. Specific Conditions

Not 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.

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Closing Block: We have reviewed and recommend issuance of draft Permit No. 4952-035-0010-V-01-0

Program	Review Engineers	Dates	Review Managers	Dates
SSPP/ASU				
SSCP/ASU				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager

Date