

Facility Name: **Pine Ridge Municipal Solid Waste Landfill**
 City: Griffin
 County: Butts
 AIRS #: 04-13-035-00010

Application #: TV-15969
 Date Application Received: January 18, 2005
 Permit No: 4953-035-0010-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 herein 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 **Pine Ridge MSW 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: 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, GA 30223
5. Attainment, Non-attainment Area Location, or Contributing Area
The facility is located in an attainment area.
6. Class I Area Impacts
The facility is located within 200 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 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
4953-035-0010-V-01-0	July 17, 2000	Initial Title V permit.
4953-035-0010-V-01-1	April 12, 2004	Amendment to incorporate the control requirements of 40 CFR 60 Subpart WWW

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)

This facility does not have a final product. Pine Ridge MSW Landfill processes general waste.

3. Overall Facility Process Description

Pine Ridge MSW Landfill receives, manages, and disposes of municipal and industrial solid waste. The waste is deposited directly into the landfill and then covered with fill dirt.

The landfill has installed a required gas collection and control system (GCCS) and an open flare.

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 landfill is now a major source under the PSD regulations of 40 CFR 52.21. Potential emissions of carbon monoxide (CO) exceed the 250 ton per year PSD major source threshold. Potential emissions of all other pollutants are below 250 tons per year. The landfill is not one of the 28 listed source categories that have a 100 tpy PSD major source threshold as per 52.21.

Nonattainment NSR does not apply because this landfill is located in a county 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	yes			✓
PM ₁₀	yes			✓
SO ₂	yes			✓
VOC	yes			✓
NO _x	yes			✓
CO	yes	✓		
TRS	yes			✓
H ₂ S	yes			✓
Individual HAP	yes			✓
Total HAPs	yes			✓

3. MACT Standards

The facility is subject to 40 CFR Part 63 Subpart AAAA - "Municipal Solid Waste Landfills." This NESHAP requires landfills to abide by the requirements of 40 CFR Part 60 Subpart WWW, and also requires the development of a Startup, Shutdown, and Malfunction Plan for the GCCS. The landfill is also subject to 40 CFR Part 61 Subpart M – NESHAP for Asbestos because the landfill may dispose of asbestos-containing materials.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	Yes
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
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. 4953-035-0010-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to that narrative.

The facility is subject to 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills. In 1999 the Tier 1 calculations for Pine Ridge Landfill exceeded the 50 Mg/yr threshold. On 8/21/00, the landfill submitted Tier 2 calculations that showed an NMOC emission rate of 126.5 Mg/yr. The facility chose to install a GCCS rather than conduct testing which would have allowed a Tier 3 calculation.

40 CFR 63 Subpart AAAA

40 CFR Part 63 Subpart AAAA – “National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.” This rule applies to each landfill that received waste after 11/6/87 that is a major source, is co-located with a major source, or is subject to the control requirements of 40 CFR 60 Subpart WWW. Pine Ridge MSW Landfill meets these criteria so it is subject to Subpart AAAA. It has a permitted capacity of over 3.3 million cubic yards; using Tier 2, its emissions have been previously calculated to exceed 50 Mg per year of NMOCs and the landfill elected to comply with the GCCS requirements of the rules rather than conduct testing which would have allowed a Tier 3 calculation.

There are not many requirements in Subpart AAAA, since EPA determined that the NSPS and EG already required a MACT level of controls. The only additional requirement is that the site must develop and implement a written SSM (startup, shutdown and malfunction) plan in accordance with § 63.6(e)(3) and maintain a copy of its SSM plan on site. Subpart AAAA also specifies the requirements for landfills that own or operate a bioreactor.

40 CFR 63 Subpart A

The NESHAP general provisions apply because Subpart AAAA applies.

C. Compliance Status

The permit application contained no indication of any non-compliance known by the company.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Permit Conditions from the initial Title V permit have been carried over into the Title V renewal permit as follows:

Condition 2.2.1 establishes 40 CFR 60 Subpart A as applicable to the landfill.

Condition 2.2.2 establishes 40 CFR 60 Subpart WWW as applicable to the landfill.

Condition 2.2.4, which has been renumbered as Condition 2.2.3 in the Title V renewal permit, establishes 40 CFR 61 Subpart A as applicable to the landfill.

Condition 2.2.5, which has been renumbered as Condition 2.2.4 in the Title V renewal permit, establishes 40 CFR 61 Subpart M as applicable to the landfill.

Permit Amendment No. 4953-035-0010-V-01-1 added Conditions 2.2.6 and 2.2.7, establishing 40 CFR 63 Subparts A and AAAA as applicable to the landfill. These conditions have been renumbered as Conditions 2.2.5 and 2.2.6 in the Title V renewal permit.

Federal Rule 40 CFR Part 60 Subpart Kb – “NSPS for Volatile Organic Liquid Storage Vessels” has been removed because this rule has been amended. As per the amended rule, this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with maximum true vapor pressure less than 15.0 kPa. The leachate vapor pressure is normally less than the threshold of 3.5 kPa (equivalent to 0.5076 psi); therefore, NSPS 40 CFR 60 Subpart Kb is no longer applicable.

Condition 2.3.1, Georgia Rule 391-3-1-.02(2)(a)1, a standard template condition regarding operational practices, has been moved and renumbered as Condition 8.17.2.

III. Regulated Equipment Requirements

A. Brief Process Description

Pine Ridge MSW Landfill accepts and disposes of municipal solid waste. An active landfill gas collection and control system (GCCS) extracts the gas created by decaying waste. The GCCS uses extraction wells, header pipes, and a fan system to pull the gas and route it to an open flare where the gas is combusted.

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-01	Landfill	40 CFR 60 Subpart A 40 CFR 60 Subpart WWW 40 CFR 61 Subpart A 40 CFR 61 Subpart M 40 CFR 63 Subpart A 40 CFR 63 Subpart AAAA 391-3-1-.02(2)(n)	2.2.1 through 2.2.6, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 5.2.1 through 5.2.9, 6.1.7, 6.2.1 through 6.2.17	FL01	Landfill Gas Collection and Control System (GCCS) and flare

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

Note that the leachate storage tank has been removed from the equipment list. This tank is no longer subject to 40 CFR Part 60 Subpart Kb.

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 4953-035-0010-V-01-0 is discussed in the initial Title V permit narrative for that permit. Please refer to that narrative.

Emission and Operating Caps: None applicable

Rules and Regulations Assessment:

40 CFR 60 Subpart WWW

The initial Title V permit contained the Subpart WWW NMOC testing and reporting requirements for landfills that were not yet subject to the landfill gas control requirements, but no standards were listed in Section 3 of the initial Title V Permit. When the initial Title V Permit was issued, the facility was not required to operate a GCCS.

The facility installed a GCCS and the landfill is subject to the control requirements of Subpart WWW. Landfill gas must be collected from areas where waste has been in place for 5 years or more if active or 2 years or more if closed. Each GCCS wellhead must be operated at negative pressure. The GCCS must be maintained such that the landfill gas temperature is less than 55°C, and have either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The

surface methane concentration must be less than 500 ppm above background. The open flare must be operated in accordance with 40 CFR 60.18.

Georgia Rule (n)

The landfill is subject to Georgia Rule (n), which governs fugitive dust emissions. The landfill must take the steps necessary to minimize fugitive dust. The opacity of fugitive dust shall not exceed 20 percent.

40 CFR 63 Subpart AAAA

In order to avoid the Subpart AAAA requirements for bioreactors, any landfill that adds liquids other than leachate into any area of the landfill must demonstrate that the moisture content of the waste mass is less than 40% by weight. The Subpart AAAA requirements for bioreactors are the same as the control requirements of 40 CFR 60 Subpart WWW, except that the deadline to install a GCCS is different.

D. Compliance Status

See Section II.C. above.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Section 3.1, the Emission Units table, was updated in Permit Amendment No. 4953-035-0010-V-01-1 to include 40 CFR 63 Subpart A and 40 CFR 63 Subpart AAAA, and the corresponding permit conditions. The leachate storage tank was removed from the equipment list because this tank was no longer subject to 40 CFR Part 60 Subpart Kb. The Condition is unchanged in the Title V renewal permit.

Condition 3.3.1 was included in Permit Amendment No. 4953-035-0010-V-01-1 to establish the control requirements and operating standards of 40 CFR 60 Subpart WWW for the GCCS. The Condition is unchanged in the Title V renewal permit.

Condition 3.3.2 was included in Permit Amendment No. 4953-035-0010-V-01-1 to require that the flare be designed and operated in accordance with 40 CFR 60.18. This is a requirement of Subpart WWW for open flares. The Condition is unchanged in the Title V renewal permit.

Condition 3.3.3, establishing the bioreactor avoidance requirements of 40 CFR 63 Subpart AAAA, is a new condition that has been added in the Title V renewal permit.

Condition 3.4.1 was included in Permit Amendment No. 4953-035-0010-V-01-1 to establish the fugitive dust reduction measures required by Georgia Rule (n). The Condition is unchanged in the Title V renewal permit.

Condition 3.4.2 was included in Permit Amendment No. 4953-035-0010-V-01-1 to establish the Georgia Rule (n) 20% opacity limit for fugitive dust. The Condition is unchanged in the Title V renewal permit.

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 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

1. Individual Equipment

Testing requirements specified in Permit No. 4953-035-0010-V-01-0 and Permit Amendment No. 4953-035-0010-V-01-1 are discussed in the initial Title V permit narrative and the Amendment narrative. Please refer to those narratives.

Condition 4.1.3, which lists the applicable test methods, was modified in Permit Amendment No. 4953-035-0010-V-01-1 to include the test methods applicable to the active GCCS, the open flare(s), and the surface monitoring as required by 40 CFR 60 Subpart WWW. This Condition is unchanged in the Title V renewal permit.

Conditions 4.2.1 through 4.2.4, which established the tier NMOC estimating procedures, were deleted by Amendment No. 4953-035-0010-V-01-1 because they were no longer applicable. Subpart WWW states that once a landfill has installed a GCCS and is subject to the control requirements, the NMOC reports are no longer required.

Condition 4.2.5 was added in Amendment No. 4953-035-0010-V-01-1 to require the landfill to use testing and calculation methods specified in Subpart WWW for the purposes of determining when the GCCS can be removed after landfill closure. This requirement has been renumbered as Condition 4.2.1 in the Title V renewal permit.

2. Equipment Groups (all subject to the same test requirements):

None applicable.

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

1. Individual Equipment:

Subpart WWW details specific monitoring of the landfill, GCCS, and control device (flare) to ensure compliance with the standards of the subpart. Conditions in Section 5.2 of the Title V permit contain the monitoring requirements of Subpart WWW. All these conditions were added in Permit Amendment No. 4953-035-0010-V-01-1 and fully incorporated into the Title V renewal permit.

Condition 5.2.1 requires the use of a device to continuously measure and record the presence of flame from the flare, and the use of a device that measures gas flow rate to the flare at least once every 15 minutes. In lieu of a flow rate monitor, the flare bypass line may be closed with a car-seal or lock-and-key (monthly inspections of the bypass seal are required if a seal is used).

Condition 5.2.2 requires sampling or access ports on each wellhead in order to perform required monthly wellhead monitoring.

Condition 5.2.3 requires monthly monitoring and recording of the gas pressure in each GCCS wellhead to ensure that the pressure is negative. This does not apply to wellheads that are attached only to passive flares because passive flares, by nature, operate under positive pressure. Excessive pressure must be reported as an exceedance as per Condition 6.1.7.

Condition 5.2.4 details the procedures (as per Subpart WWW) that must be followed if the GCCS wellhead gas pressure is not negative.

Condition 5.2.5 requires monthly monitoring and recording of each GCCS wellhead temperature and nitrogen or oxygen level. Excessive temperature and oxygen or nitrogen levels must be reported as an exceedance as per Condition 6.1.7.

Condition 5.2.6 details the procedures (as per Subpart WWW) that must be followed if the GCCS wellhead gas temperature, nitrogen content, or oxygen content exceeds the allowable values.

Condition 5.2.7 requires quarterly surface methane concentration monitoring on the landfill, and describes the procedures that must be followed if any methane concentrations

exceed the allowable values. Excessive methane concentrations must be reported as an exceedance as per Condition 6.1.7.

Condition 5.2.8 details the methods for conducting the surface methane concentration monitoring.

Condition 5.2.9 requires the landfill to develop a program for monthly inspections of the landfill cover integrity, and to keep a record of the inspection findings.

The initial Title V permit and the Amendment include Conditions 5.3.1 through 5.3.5. Section 5.3 is not included in Title V permits anymore. Please see explanations in the next section, which indicate where the Conditions can be found in Sections 6.1 or 6.2.

Condition 5.3.4 required that all recorded data required by Conditions 5.2.1 through 5.2.9 be maintained as per Conditions 5.3.2 and 6.1.1. The record keeping requirements are incorporated into other permit conditions, so this condition is no longer applicable and so was not put into the Title V renewal permit.

2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

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. 4953-035-0010-V-01-0 and Amendment No. 4953-035-0010-V-01-1 are discussed in the permit narratives for those permits. Please refer to those narratives.

Conditions 6.1.1 through 6.1.3 that specify the general record keeping and reporting requirements have been carried over from the initial Title V Permit.

Condition 6.1.4, requiring semiannual reports of excess emissions, exceedances, and excursions, was added in Permit Amendment No. 4953-035-0010-V-01-1 and carried over into the Title V renewal permit.

Conditions 6.1.5 and 6.1.6, for standard record keeping requirements, are Conditions 5.3.1 and 5.3.2 from the initial Title V Permit. They have been moved to Section 6 and renumbered as part of the Title V renewal permit.

New Condition 6.1.7 details the excess emissions, exceedances, excursions, and other information that must be reported for each period. The following exceedances must be reported: exceedances of the allowable wellhead pressure, temperature, nitrogen or oxygen level; exceedances of the allowable surface methane concentration; and failure to develop, implement and maintain on site the Startup, Shutdown, and Malfunction Plan under 40 CFR 63 Subpart AAAA. Any failure to follow the dust suppression plan is defined as an excursion. This was originally Condition 6.1.5 in Permit Amendment No. 4953-035-0010-V-01-1.

Condition 6.2.1 from the initial Title V permit requires annual NMOC emission rate reporting as a requirement for uncontrolled landfills. Since the landfill is controlled by a GCCS and subject to the control requirements of Subpart WWW, this emission rate reporting is no longer required. There is no need to delete Condition 6.2.1 because Condition 6.2.4 states that landfills are exempt from this requirement after the GCCS is installed and operating in accordance with Subpart WWW. However the subparagraphs are removed.

Condition 6.2.2 from the initial Title V Permit was deleted in Permit Amendment No. 4953-035-0010-V-01-1. This condition required that the landfill submit a GCCS Plan within one year after NMOC calculations show that the NMOC generation rate at the landfill exceeds 50

megagrams/yr. Pine Ridge MSW Landfill has already submitted a GCCS plan and installed the system. Because this one-time requirement has been satisfied, the Condition is deleted.

New Condition 6.2.2 concerning the Dust Suppression Plan is Condition 5.3.3 in the initial Title V Permit. It was modified in Permit Amendment No. 4953-035-0010-V-01-1. This condition has been moved to Section 6 and renumbered as part of the Title V renewal permit. It is identical to the Condition in the Amendment.

Condition 6.2.3, from the initial Title V permit, requires keeping on-site records of the design capacity report, amount of solid waste in place, and the year by year acceptance rate. It has been carried over into the Title V renewal permit.

Condition 6.2.5, from the initial Title V permit, authorizes the facility to exclude any areas of deposited asbestos or other nondegradable waste from being part of a required 40 CFR 60 Subpart WWW GCCS. It has been carried over into the Title V renewal permit.

Conditions 6.2.6 and 6.2.7, from the initial Title V permit, detail the asbestos requirements of 40 CFR 61 Subpart M as they apply to the landfill. These conditions have been carried over into the Title V renewal permit.

Condition 6.2.8, from the initial Title V permit, was deleted by Amendment No. 4953-035-0010-V-01-1. This condition required record keeping for the leachate storage vessel per 40 CFR 60 Subpart Kb. Subpart Kb is no longer applicable.

New Condition 6.2.8 details the reporting requirements of Subpart WWW that must be followed if any monitoring reveals an exceedance of the allowable under the rule. This is Condition 5.3.5 in the initial Title V Permit. This condition has been moved to Section 6 and renumbered as part of the Title V renewal permit.

Condition 6.2.9 was included in Permit Amendment No. 4953-035-0010-V-01-1 to require submittal of a landfill closure report as per Subpart WWW. The Condition is unchanged in the Title V renewal permit.

Condition 6.2.10 was included in Permit Amendment No. 4953-035-0010-V-01-1 to require submittal of a GCCS equipment removal report, when appropriate, as per Subpart WWW. The Condition is unchanged in the Title V renewal permit.

Condition 6.2.11 was included in Permit Amendment No. 4953-035-0010-V-01-1 to require that all records made during performance testing be kept on site for a minimum of 5 years as per Subpart WWW. The Condition is unchanged in the Title V renewal permit.

Condition 6.2.12 was included in Permit Amendment No. 4953-035-0010-V-01-1 to require that records and maps of the GCCS system be kept on site for the lifetime of the system as per Subpart WWW. The Condition is unchanged in the Title V renewal permit.

Condition 6.2.13 was included in Permit Amendment No. 4953-035-0010-V-01-1 to require that records of all exceedances be kept on site as per Subpart WWW. The Condition is unchanged in the Title V renewal permit.

Condition 6.2.14 was included in Permit Amendment No. 4953-035-0010-V-01-1 to require that the landfill develop, implement, and maintain on site a Startup, Shutdown, and Malfunction Plan in accordance with 40 CFR Part 63 Subparts A and AAAA. The Condition is unchanged in the Title V renewal permit.

New Condition 6.2.15 requires that the landfill keep calculations of the waste mass moisture content if the landfill adds liquids other than leachate to the landfill. These calculations are 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 the condition, to update the calculations quarterly was added by EPD since Subpart AAAA did not provide guidance on how often this should be updated.

New Condition 6.2.16 requires that the landfill notify the Division if the moisture content of the waste mass exceeds 40 percent by weight. If the moisture content exceeds 40%, the landfill becomes subject to the bioreactor requirements of Subpart AAAA.

New Condition 6.2.17 requires that the landfill notify the Divisions if the landfill begins adding liquids, other than leachate, to the landfill waste mass. This requirement is not part of Subpart AAAA but it will give the Division an indication that the landfill may become a bioreactor at some point.

VII. Specific Requirements

A. Operational Flexibility

- Not applicable

B. Alternative Requirements

- Not 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

- Not applicable

E. Short-Term Activities

When these activities occur, the Permittee is required to maintain records relating to these activities:

a) Construction of Landfill Cell

b) Capping (Closure) of Landfill Cell

This has been included in the permit.

F. Compliance Schedule/Progress Reports

- There are no non-compliance issues at the facility based on the Title V renewal application and the permit review.

G. Emissions Trading

- Not applicable

H. Acid Rain Requirements

- Not applicable

I. Stratospheric Ozone Protection Requirements

Pine Ridge MSW Landfill has 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.

J. Pollution Prevention

- Not applicable

K. 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.

Addendum to Narrative

The 30-day public comment period started on April 5, 2006 and ended on May 5, 2006. No comments were received from the public, company, and EPA.

The Division has made changes to Permit No. 4953-035-0010-V-02-0 to update the permit language of the startup, shutdown, and malfunction (SSM) requirements of 40 CFR 63 Subpart A. The changes are as follows:

New Condition 3.3.4 requires the Permittee to develop a written startup, shutdown, and malfunction (SSM) plan. The Condition reads:

3.3.4 In accordance with 40 CFR Part 63 Subpart A, the Permittee shall develop a written startup, shutdown, and malfunction (SSM) plan that describes in detail the procedures for operating and maintaining the gas collection and control system and the continuous monitoring system(s) during periods of SSM so as to meet the SSM requirements that are listed in the general provisions to 40 CFR 63.6(e)(3). [391-3-.02(6)(b), and 40 CFR 63 Subpart A]

Condition 6.2.14 has been modified to reflect the reporting requirements of the startup, shutdown, and malfunction (SSM) plan as required by 40 CFR 63 Subpart A. The Condition was:

6.2.14 The Permittee shall develop and implement a written Startup, Shutdown and Malfunction (SSM) Plan as required by 40 CFR 63 Subpart A. The written plan shall be kept on site for the life of the GCCS. Reporting shall be done as follows:
[40 CFR 63.1960, 40 CFR 63.10(b), and 40 CFR 63.6(e)]

- a. When actions taken by the owner or operator during a SSM event are consistent with the procedures specified in the affected source's SSM plan, the Permittee must keep records for that event, which demonstrate that the procedures specified in the plan were followed. The records may take the form of a checklist and include the requirements of 63.10(b).
- b. When actions taken by the owner or operator during a SSM event are inconsistent with the procedures specified in the affected source's SSM plan, and the source exceeds the relevant emission standard, the Permittee shall make an immediate report of the SSM event. The report shall be made to the Division within 2 working days of the event and a follow-up report shall be made in writing within 7 days of the end of the event, as required by 40 CFR 63.6(e).

Condition 6.2.14 now reads:

6.2.14 The written Startup, Shutdown and Malfunction (SSM) Plan as required by 40 CFR 63 Subpart A in Condition 3.3.4, shall be kept on site for the life of the GCCS. Reporting and recordkeeping shall be done as follows:
[40 CFR 63.1960, 40 CFR 63.10(b), and 40 CFR 63.6(e)]

- a. When actions taken by the owner or operator during a startup or shutdown (and the startup or shutdown causes the source to exceed an applicable emission limitation in the relevant emission standard), or malfunction, (including actions taken to correct the malfunction) are consistent with the procedures in the plan, the Permittee must keep records for that event, which demonstrate

that the procedures specified in the plan were followed. The records may take the form of a checklist and include the requirements of 40 CFR 63.10(b).

- b. When actions taken by the owner or operator during a SSM event are inconsistent with the procedures specified in the affected source's SSM plan, and the source exceeds the relevant emission standard, the Permittee shall make an immediate report of the SSM event. The report shall be made to the Division within 2 working days of the event and a follow-up report shall be made in writing within 7 days of the end of the event, in accordance with 40 CFR 63.10(d)(5).
- c. The owner or operator shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual startup, shutdown, and malfunction report required in §63.10(d)(5). This report shall be submitted with the semiannual reports required by Condition 6.1.3, Condition 6.1.4, and Condition 6.2.8 of this Permit.