

Facility Name: **SR 110 MSW Landfill**
City: Woodbine
County: Camden
AIRS #: 04-13-039-00027

Application #: TV-15986
Date Application Received: January 25, 2005
Permit No: 4953-039-0027-V-02-0

Program	Review Engineers	Review Managers
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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 **SR 110 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:

SR 110 MSW Landfill

2. Parent/Holding Company Name

Camden County Board of Commissioners

3. Previous and/or Other Name(s)

None

4. Facility Location

5395 Highway 110
Woodbine, Georgia 31569
Camden County

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, Okefenokee Wildlife Reserve Area, and Wolf Island Wilderness Area.

B. 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
4953-039-0027-V-01-0	July 25, 2000	Initial Title V

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 is a landfill that processes general waste.

3. Overall Facility Process Description

This facility is a landfill that processes general waste.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The facility is not major for PSD/NSR regulations.

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	y			x
PM ₁₀	y			x
SO ₂	y			x
VOC	y			x
NO _x	y			x
CO	y			x
TRS	n			
H ₂ S	n			
Individual HAP	y			x
Total HAPs	y			x

3. MACT Standards

40 CFR 63, Subpart AAAAA – *Municipal Solid Waste Landfills* does not apply to this facility since the calculated NMOC emission rate is not greater than 50 megagrams per year, and is not yet required to install a Gas Collection and Control System (GCCS). However, at a future time, the facility may be subject to this regulation.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	n
Program Code 8 – Part 61 NESHAP	y
Program Code 9 - NSPS	y
Program Code M – Part 63 NESHAP	n
Program Code V – Title V	y

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. 4953-039-0027-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

40 CFR 63, Subpart AAAA – *Municipal Solid Waste Landfills* does not apply to this facility since the calculated NMOC emission rate is not greater than 50 megagrams per year.

40 CFR 60 Subpart WWW – *Standards of Performance for Municipal Solid Waste Landfills*
This regulation applies to this facility since the landfill was constructed after May 30, 1991. The facility is currently accepting waste and the landfill area does not have a capacity larger than 2.5 million cubic meters, and the calculated NMOC emission rate is less than 50 megagrams. The facility is using Tier 1 to calculate NMOC emissions.

C. Compliance Status

The facility's application did not indicate any issues of non-compliance.

D. Operational Flexibility

None applicable.

E. Permit Conditions

The previous Condition 2.2.1 that listed applicable regulations, has been separated into individual new Conditions 2.2.1 – 2.2.4.

New Conditions 3.4.1 and 3.4.2 were added to the Renewal Permit to include the requirements of Georgia Rule (n) – *Fugitive Dust*.

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 4953-039-0027-V-01-0. Please refer to this narrative.

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
1	Landfill	40 CFR Part 60 Subpart WWW; 40 CFR Part 60, Subpart A; 40 CFR Part 61 Subpart M; 40 CFR Part 61, Subpart A; 391-3-1-.02(2)(n)	2.2.1-2.2.4, 3.4.1, 3.4.2, 4.2.1-4.2.5, 6.1.7, 6.2.1- 6.2.10	None	None

Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 4953-039-0027-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

D. Compliance Status

The facility's application did not indicate any issues of non-compliance.

E. Operational Flexibility

None applicable.

F. Permit Conditions

New Conditions 3.4.1 and 3.4.2 were added to the Renewal Permit to include the requirements of Georgia Rule (n) – *Fugitive Dust*.

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. 4953-039-0027-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

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:**

None applicable.

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 Permit No. 4953-039-0027-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Permit No. 4953-039-0027-V-02-0	Permit No. 4953-039-0027-V-01-0
(New) Condition No.	(Previous) Condition No.
6.2.1	New
6.2.2	6.2.1
6.2.3	6.2.2
6.2.4	6.2.3
6.2.5	6.2.4
6.2.6 (updated language)	6.2.6
6.2.7	New
6.2.8	6.2.5
6.2.9	6.2.7
6.2.10	6.2.8

New Condition 6.2.1 requires the facility submit in writing an amended design capacity report when there is any increase in the design capacity of a landfill. This condition was added due to the 40 CFR, Part 60, Subpart WWW.

New Condition 6.2.7 requires the facility shall develop and implement a Dust Suppression Plan and was added due to Georgia Rule (n).

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.

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. Stratospheric Ozone Protection Requirements
Not Applicable.

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 review ended on June 12, 2006. No comments were received by the Division.