

Facility Name: **Pine Bluff Landfill**
 City: Ball Ground
 County: Cherokee
 AIRS #: 04-13-057-00040

Application #: TV-16800
 Date Application Received: June 27, 2006
 Permit No: 4953-057-0040-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 Bluff 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 Bluff Landfill

2. Parent/Holding Company Name

Waste Management

3. Previous and/or Other Name(s)

No previous names identified

4. Facility Location

13809 East Cherokee Drive
Ball Ground, GA 30107

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in a non-attainment area for the 8-hour ozone standard and the PM_{2.5} standard.

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
4953-057-0040-V-01-0	December 27, 2001	Initial Title V permit.
4953-057-0040-V-01-1	October 27, 2004	502(b)(10) for replacement of Flare 1
4953-057-0040-V-01-2	January 10, 2005	Amendment added treatment system as compliance option under 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 Bluff Landfill processes general waste.

3. Overall Facility Process Description

The Pine Bluff 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 operates a gas collection and control system (GCCS). Landfill gas is routed to the landfill gas treatment system. The treatment system filters, de-waters, and compresses the landfill gas. The treated gas is piped to a third party user for fuel. Flares are used to destroy landfill gas that is not routed to the treatment system.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Pine Bluff Landfill is 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.

Atlanta Non-Attainment Area (NAA) Standards for ozone and PM_{2.5}

Under the old 1-hour ozone standard the Atlanta NAA consisted of 13 counties, including Cherokee County, where Pine Bluff Landfill is located. The major source threshold for NO_x and VOC was 50 tpy until January 1, 2004, on which date it became 25 tpy. The landfill is a major source for NO_x and a minor source for VOC according to this standard.

As a major source of NO_x the landfill is subject to NO_x RACT under Georgia Rule (yy) – “Emissions of Nitrogen Oxides from Major Sources.” However, the flares are exempt from this rule because Rule (yy) does not apply to secondary emissions from control devices used to comply with an emission standard. Apart from the flares, the only other source of NO_x at the facility is a small diesel-powered engine used to power the truck tipper.

In 2005 the Atlanta NAA met the 1-hour ozone standard. The 1-hour ozone standard no longer exists; it has been replaced with the 8-hour ozone standard. However, the major source threshold for NO_x and VOC for the old 1-hour ozone 13 county NAA remains 25 tpy and major sources remain subject to NO_x and/or VOC RACT.

Under the new 8-hour ozone standard, the Atlanta NAA consists of 20 counties, which includes Cherokee County. The major source threshold for NO_x and VOC for this standard is 100 tpy. Pine Bluff Landfill is a minor source for this standard.

Under the PM_{2.5} standard, Cherokee County is part of the Atlanta NAA where the major source threshold for PM_{2.5} is 100 tpy. Pine Bluff Landfill is a minor source for this standard.

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 Part 63 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.

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 initial Title V Permit No. 4953-057-0040-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to that narrative.

40 CFR 60 Subpart WWW

This facility is subject to 40 CFR Part 60 Subpart WWW "Municipal Solid Waste Landfills." Subpart WWW applies to landfills that were constructed, reconstructed or modified after 5/30/91 and have a design capacity exceeding both 2.75 million tons and 3.3 MMyd³. The landfill has a total design capacity of 30.2 MMyd³. Using Tier 1, the facility calculated their NMOC emissions rate to be 205 Mg/year (calculated using NSPS factors). This exceeds the Subpart WWW 50 Mg NMOC threshold limit. The landfill then performed a Tier 2 test, which showed NMOC emission rates to be 46.4 Mg/year. With their Tier 2 results so close to 50 Mg/yr, Pine Bluff Landfill proceeded with the installation of the landfill gas collection and control system (GCCS). Subpart WWW is a New Source Performance Standard (NSPS).

According to 40 CFR 60 Subpart WWW "NSPS for Municipal Solid Waste Landfills" (in 60.752(b)(2)(iii)), landfills required to collect landfill gas must route the collected gases to either: an open flare, an enclosed combustion device (such as an enclosed flare, boiler, or IC engine), or a landfill gas treatment system that processes the gas prior to sale or use. In the proposed amendment to Subpart WWW, EPA clarifies its position on gas treatment: "Once landfill gas is treated, facilities that buy or use the gas have no further obligation related to the NSPS." Therefore, if a landfill treats the landfill gas prior to selling it for fuel, the equipment which combusts the landfill gas as fuel is not subject to the emission standards or monitoring requirements of Subpart WWW.

In the preamble to the proposed amendment to 40 CFR 60 Subpart WWW, EPA also defines the minimum requirements for landfill gas treatment: "At a minimum, the system must filter landfill gas using a dry filter or similar device...the filter should reduce particulate matter....In addition, the system must de-water landfill gas using chillers or other dehydration equipment.... Finally, the system must compress landfill gas using gas blowers..." EPA also states that the treated landfill gas must still be combusted and may not be released uncontrolled into the atmosphere.

In a letter dated 8/15/03 from Michael Kenyon, EPA Region 1 Air Programs Chief, to Douglas McVay, Rhode Island DEM, EPA clarifies its stance on the use of landfill gas treatment systems in order to comply with Subpart WWW:

"....As you know, the NSPS does not now contain a definition for the term "treatment system." However, EPA's May 23, 2002 Federal Register Notice contains a proposed definition of the

term, which also constitutes EPA's current interpretation of the term as it now appears in the NSPS. The preamble to EPA's May 23, 2002 proposed rulemaking also includes the following statements about the proposed definition of "treatment system":

"At a minimum, the system must filter landfill gas using a dry filter or similar device (e.g., impaction, interception or diffusion device). The filter should reduce particulate matter in the gas stream. This will prolong the life of the combustion device and decrease the buildup of material on combustion device internals, which will support good combustion. Good combustion is essential to ensuring the proper destruction of NMOC. In addition, the system must de-water landfill gas using chillers or other dehydration equipment. The de-watering equipment should reduce moisture content of the gas, which will maintain low water content in the gas and will prevent degradation of combustion efficiencies. Finally, the system must compress landfill gas using gas blowers or similar devices. Compression should further reduce the moisture content of the gas and raise gas pressure to the level required by the end use combustion device."

Thus, if RPPP treats the landfill gas it receives in accordance with EPA's proposed definition of "treatment system" and consistent with the preamble discussion quoted in the preceding paragraph, then Region 1 concurs that the IC engines combusting the treated landfill gas are not subject to the requirements of 40 CFR 60.752(b)(2)(iii)(B). Treatment of the landfill gas in this manner is a means of compliance with the gas control requirements of the NSPS that differs from, and is in the alternative to, the IC engine performance testing and NMOC destruction efficiency compliance method that formed the basis of Region 1's 2001 enforcement action. However, keep in mind that, in accordance with 40 CFR 60.752(b)(2)(iii)(C), any emissions from any atmospheric vent from the gas treatment system, including any compressor, are still subject to the requirements of 40 CFR 60.752(b)(2)(iii)(A) and (B). ..."

See EPA determination Control Number 0300121 for the full text of the above-referenced letter.

The treatment system satisfies the minimum requirements of treatment systems as specified in the proposed amendment to Subpart WWW. The treatment system includes a series of 10-micron filters, a chiller which reduces the gas temperature from 100°F to 40°F, and a blower to compress the landfill gas to 22 psi.

As stated above, the existing open flares will continue to be subject to the applicable control, monitoring, and record keeping requirements of 40 CFR 60 Subpart WWW "Municipal Solid Waste Landfills," because the landfill gas going to the flares will not be treated prior to combustion.

40 CFR 60 Subpart A

Since the landfill is subject to 40 CFR 60 Subpart WWW, it is also subject to the General Provisions of the NSPS.

40 CFR 61 Subpart M

Since the facility accepts asbestos waste, the facility is subject to 40 CFR Part 61 Subpart M. As long as the landfill remains active it is required to comply with the provisions of 40 CFR 61.154 – "Standards for Active Waste Disposal Sites" including all reporting and record keeping requirements applicable to facilities which accept asbestos waste. Upon closure, the facility will

be required to comply with 40 CFR 61.151-“Standards for Inactive Waste Disposal Sites for Asbestos.” These rules are a 40 CFR Part 61 National Emission Standard for Hazardous Air Pollutants (NESHAP).

40 CFR 61 Subpart A

Since the landfill is subject to 40 CFR 61 Subpart M, it is also subject to the General Provisions of the NESHAP.

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 Bluff Landfill meets these criteria so it is subject to Subpart AAAA. It has a permitted capacity of over 3.3 million cubic yards; as indicated above using Tier 1, the emissions were calculated to exceed 50 Mg per year of NMOCs. Tier 2 emissions were calculated to be 46.4 Mg per year, so the landfill elected to install a GCCS. This rule is a 40 CFR Part 63 NESHAP.

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 was 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 Part 63 NESHAP general provisions apply because Subpart AAAA applies.

C. Compliance Status

The Title V renewal application submitted by this facility contains a compliance certification, which was signed by the company's responsible official, certifying that “this facility is in compliance with all applicable requirements effective as of the date of this certification and will continue to comply with such requirements.” The Title V 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 and Permit Amendment No. 4953-057-0040-V-01-1 have been incorporated into the Title V renewal permit with the following changes.

Section 2.2 has been modified as follows:

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

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

Condition 2.2.3 establishes 40 CFR Part 61 Subpart A as applicable to the landfill.

Condition 2.2.4 establishes 40 CFR Part 61 Subpart M as applicable to the landfill.

Condition 2.2.5 establishes 40 CFR Part 63 Subpart A as applicable to the landfill.

Condition 2.2.6 establishes 40 CFR Part 63 Subpart AAAA as applicable to the landfill.

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.

III. Regulated Equipment Requirements

A. Brief Process Description

Pine Bluff Landfill receives, manages, and disposes of solid waste. The landfill operates a gas collection and control system (GCCS). Landfill gas is routed to the landfill gas treatment system. The treatment system filters, de-waters, and compresses the landfill gas. The treated gas is piped to a third party user for fuel. The treatment system serves as a control device for the landfill gas. Flares are used to destroy landfill gas that is not routed to the treatment system.

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	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 391-3-1-.02(2)(n)	2.2.1 through 2.2.6, 3.3.1 through 3.3.4, 3.4.1, 3.4.2, 4.2.1, 5.2.1 through 5.2.9, 6.1.7, 6.2.1 through 6.2.18	F1, F2	Gas Collection and Control System(s), controlled by flares and/or landfill gas treatment system(s)

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

Note that the leachate storage tanks have been removed from the equipment list. These tanks are no longer subject to 40 CFR Part 60 Subpart Kb.

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in initial Title V Permit No. 4953-057-0040-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 landfill is subject to 40 CFR 60 Subpart WWW "NSPS for Municipal Solid Waste Landfills." The initial Title V permit contains all the applicable requirements of Subpart WWW as it applies to the landfill and the existing open flares. Since the initial Title V permit was issued, the landfill has added a landfill gas treatment system. Subpart WWW requires that all landfill gas vented from the treatment system be destroyed according to the destruction requirements of Subpart WWW.

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

Condition 3.3.1 has been removed from the permit. The GCCS plan has been submitted and the requirements of 40 CFR 60 Subpart WWW are incorporated in other permit conditions.

Condition 3.3.3, operational standards for collection and control systems, has been renumbered as Condition 3.3.1. The condition was modified in Permit Amendment No. 4953-057-0040-V-01-2 to include the landfill gas treatment system as an approved control device.

Condition 3.3.2, requirements for flares, is unchanged in the Title V renewal permit.

Condition 3.3.4, establishing the bioreactor avoidance requirements, was added in Permit Amendment No. 4953-057-0040-V-01-1. The condition has been renumbered as Condition 3.3.3 in the Title V renewal permit.

Condition 3.3.4, requiring the facility to develop a written startup, shutdown, and malfunction (SSM) plan, was added in Permit Amendment No. 4953-057-0040-V-01-1 as Condition 6.2.17. In the Title V renewal permit, the condition has been modified to update the permit language of the SSM requirements of 40 CFR 63 Subpart A, and renumbered as Condition 6.2.8. New Condition 3.3.4 requires a written SSM plan and Condition 6.2.8 contains the record keeping and reporting requirements of the SSM plan.

Conditions 3.4.1 and 3.4.2 re-state the Rule (n) fugitive dust rule to assure that the landfill operators understand that they must take all reasonable precautions when moving dirt. Condition 3.4.2 also establishes the Georgia Rule (n) 20% opacity limit for fugitive dust. These conditions are 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. 4953-057-0040-V-01-0 are discussed in the initial Title V permit narrative for that permit. Please refer to that narrative.

Conditions 4.2.1 through 4.2.4, which established the tier NMOC estimate procedures, were deleted because they are 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, required that the open flare undergo initial testing in accordance with 40 CFR 60.18 per Subpart WWW. This testing involved opacity testing of the flare, measurement of the exit velocity of the landfill gas at the flare outlet, and the determination of landfill gas heating value. This test has been completed; therefore, this condition is no longer applicable.

Condition 4.2.6 requires 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 (landfill gas treatment system, flares, or other) 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.

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 and the landfill gas treatment system 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). This condition was modified to add the landfill gas treatment system in Permit Amendment No. 4953-057-0040-V-01-2.

Conditions 5.2.2 through 5.2.9 are unchanged from the initial Title V permit.

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 each GCCS wellhead gas pressure 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 Amendments include Conditions 5.3.1 and 5.3.2. 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 5.3.2 required that all recorded data required by Conditions 5.2.1 through 5.2.9 be maintained as per Conditions 6.1.5 and 6.1.1. The record keeping requirements are incorporated into other permit conditions; therefore, this condition is not included in 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 Permit No. 4953-057-0040-V-01-0 are discussed in the initial Title V permit narrative for that permit. Please refer to that narrative.

Conditions 6.1.1 through 6.1.3, that specify the general record keeping and reporting requirements, are unchanged from the initial Title V Permit.

Condition 6.1.4 requires semiannual reports of excess emissions, exceedances, and excursions. This was Condition 6.1.6 in the initial Title V Permit and has been renumbered in the Title V renewal permit.

Conditions 6.1.4 and 6.1.5, standard record keeping requirements, have been renumbered as Conditions 6.1.5 and 6.1.6. The conditions are unchanged from the initial Title V Permit.

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; exceedances for periods exceeding 1 hour when the flares and treatment system are not operating, and periods exceeding 5 days when the GCCS is not operating; and failure to develop, implement and maintain on site the Startup, Shutdown, and Malfunction (SSM) Plan under 40 CFR 63 Subpart AAAAA. The only excursion defined is failure to follow the dust suppression plan required in Condition 6.2.10. Condition 6.1.7 differs from the initial Title V permit in that it includes exceedances and excursions for the flares and treatment system, the SSM plan, and the dust suppression plan which was added in Permit Amendment No. 4953-057-0040-V-01-2.

Condition 6.2.1, with procedures for calculating NMOC emissions, has been modified in the Title V renewal permit to remove any mention of the Tier 2 and Tier 3 NMOC emissions, since they are no longer applicable.

Condition 6.2.2 required the landfill to submit a GCCS Plan within one year after NMOC calculations show that the NMOC generation rate at the landfill exceeded 50 megagrams/yr. Pine Bluff Landfill has already submitted a GCCS plan. Because this one-time requirement has been satisfied, it is not included in the Title V renewal permit.

Condition 6.2.8 exempts the facility from submitting annual NMOC emission rate reports upon installation of a gas collection and control system (GCCS). This condition has been renumbered as Condition 6.2.2.

Conditions 6.2.3 through 6.2.6 are unchanged from the initial Title V permit. Condition 6.2.3 requires keeping on-site records of the maximum design capacity, the amount of solid waste in place, and the year-by-year acceptance rate. Conditions 6.2.4 through 6.2.6 require facilities that have received asbestos-containing waste to comply with the requirements of 40 CFR 61 Subpart M.

Condition 6.2.7 has not been carried into the Title V renewal permit. This condition required record keeping for the leachate storage vessels per 40 CFR 60 Subpart Kb. Subpart Kb is no longer applicable.

Condition 5.3.2, requirements for semiannual reporting, was modified in Permit Amendment No. 4953-057-0040-V-01-2 to include the gas treatment system. This condition has been moved to Section 6 and renumbered as Condition 6.2.7 in the Title V renewal permit

Condition 6.2.8 requires 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. This was Condition 6.2.17 in Permit Amendment No. 4953-057-0040-V-01-1. The permit language has been updated in the Title V renewal permit.

Conditions 6.2.9 through 6.2.11 are unchanged from the initial Title V permit. These conditions contain the requirements for a closure report, dust suppression plan, and gas collection and control equipment removal report.

Condition 6.2.12 required the landfill to submit an initial performance test report for the GCCS. Pine Bluff Landfill has submitted the report. Because this one-time requirement has been satisfied, it is not included in the Title V renewal permit.

Conditions 6.2.13 through 6.2.16 have been carried over from the initial Title V permit; however, they have been renumbered as Conditions 6.2.12 through 6.2.15 in the Title V renewal permit.

Conditions 6.2.18 through 6.2.20 were added in Permit Amendment No. 4953-057-0040-V-01-1. Condition 6.2.18 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 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 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. Condition 6.2.19 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 percent, the landfill becomes subject to the bioreactor requirements of Subpart AAAA. Condition 6.2.20 requires that the landfill 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.

These conditions have been renumbered as Conditions 6.2.16 through 6.2.18 in the Title V renewal permit.

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

- Not applicable

G. Emissions Trading

- Not applicable

H. Acid Rain Requirements

- Not applicable

I. Stratospheric Ozone Protection Requirements

Pine Bluff 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 December 8, 2006 and ended on January 8, 2007. No comments were received from the public, company, and EPA.