

Facility Name: **Hickory Ridge Sanitary Landfill**  
 City: Conley  
 County: DeKalb  
 AIRS #: 04-13-089-00297

Application #: TV-15316  
 Date Application Received: May 4, 2004  
 Permit No: 4953-089-0297-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 **Hickory Ridge Sanitary 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:

Hickory Ridge Sanitary Landfill (“Hickory Ridge Landfill”)

## 2. Parent/Holding Company Name

BFI Waste Systems of North America, Inc. is the parent/holding company. Prior to the purchase of the landfill by BFI Waste Systems of North America, Inc. in 1997, Hickory Ridge Sanitary landfill was owned and operated by Moreland Avenue Disposal, Inc. The name of the facility has always been Hickory Ridge Sanitary Landfill.

## 3. Previous and/or Other Name(s)

None

## 4. Facility Location

3330 Moreland Avenue  
Conley, Georgia, DeKalb County

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

DeKalb County is located in a non-attainment area for ozone.

## 6. Class I Area Impacts

The facility is located within 200 km of a Class I area.

**B. Site Determination**

The Bio Energy (Georgia) LLC – Hickory Ridge Power Station is authorized to be located at the Hickory Ridge Landfill, per Title V Permit No. 4911-089-0323-V-01-0. A site determination was carried out to determine if the landfill and the generating plant were going to be one site under Title V. The following is a summary of the results.

1. Contiguous/adjacency: The Hickory Ridge Power Station will be located on the Hickory Ridge Sanitary Landfill. The facilities are clearly contiguous.
2. Common control: The ownership and management of the two companies appear to not be related in any way other than by contract(s) which provide that the generation plant will buy the LFG and maintain the GCCS. There is no other common financial interest nor management relationship. Therefore, it might normally be concluded that there is not “common control” and the facilities are separate Title V sites. However, because the only fuel available to the power station is supplied by the landfill, it was determined that the

landfill and the power station are effectively under common control and are therefore one site per Title V.

This conclusion is supported by an EPA determination from Region 3. This is found in the May 1, 2002 letter to Virginia DEQ regarding the Maplewood Landfill, owned by USA Waste of Virginia, and Industrial Power Generating Corporation (“INGENCO”), a power generating company. This is regarding a proposal by Maplewood to sell LFG to INGENCO, which would use it to fuel IC engines to drive generators. According to the determination, the ‘overarching question’ raised by a letter from VADEQ was “whether Maplewood and INGENCO are under ‘common control’ for purposes of determining whether Maplewood and INGENCO are a single stationary source under PSD and Title V.” An important aspect raised by VADEQ was that “landfill gas will comprise up to 70 percent of the INGENCO’s fuel.”

The Region 3 determination letter concluded that the facilities were not the same Title V site because “INGENCO’s facility does not need landfill gas to operate; the engines at use at the facility can run exclusively on liquid fuels such as diesel. In addition, Maplewood owns and controls its gas collection system and will continue to maintain its own flare. Maplewood accordingly does not need INGENCO to destroy the landfill gas as required by 40 CFR part 60, subpart WWW.”

In contrast to that, the determination cites an EPA February 11, 1998 letter “to Terry Godar, VADEQ that addressed common control for another Virginia landfill. In its letter to EPA, VADEQ noted that ‘The gas collection and the control system ... [landfill gas energy recovery]... will be located on the landfill property *and will be used exclusively to collect emissions from the landfill and to control those emissions through energy recovery.*’ (emphasis added). EPA cited this interdependence between the landfill and the gas collection and control system as an indication that the two facilities were under common control.”

Hickory Ridge Sanitary Landfill (AFS No. 04-13-089-00297) and Hickory Ridge Power Station (AFS No. 04-13-089-00323) are parts of the same Title V Site. This Title V Permit will cover only Hickory Ridge Sanitary Landfill. Hickory Ridge Power Station (AFS No. 04-13-089-00323) has been issued a separate Title V Permit (Permit No. 4911-089-0323-V-01-0), which authorized the construction and operation of the power station. Permit No 4911-089-0323-V-01-0 was final on September 27, 2004.

### 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
4953-089-0297-V-01-0	November 3, 1999	Initial Title V Permit
4953-089-0297-V-01-1	September 27, 2004	Amendment for transfer of landfill gas to third-party user, and incorporate control requirements of 40 CFR 60 Subpart WWW and 40 CFR 63 Subpart AAAA
4953-089-0297-V-01-2	February 15, 2005	502(b)(10) Change for addition of second back-up flare

D. Process Description

1. SIC Codes(s)

4953 – Operation of a sanitary landfill

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)

Hickory Ridge Sanitary Landfill does not produce a final product. The landfill receives municipal solid waste and other solid wastes which are deposited directly into the landfill.

3. Overall Facility Process Description

Hickory Ridge Sanitary 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 gas collection and control system (GCCS) and one or more open flares. The GCCS is to be regulated based on NMOC Tier 2 calculations. The facility is also authorized to duct collected landfill gas (LFG) to a landfill gas-fueled power generation station consisting of up to three internal combustion (IC) engines. The open flare(s) will operate as a backup.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

PSD status: Major

The Title V site consisting of the landfill and the power station 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. Neither the landfill nor the power station is included as one of the 28 listed source categories that have a 100 tpy PSD major source

threshold as per 52.21. Fugitive emissions are not counted toward the PSD major source threshold.

NSR status: Major

Non-attainment NSR regulations apply to sources located in the 13-county Atlanta non-attainment area (including DeKalb County) that have potential emissions of either NO<sub>x</sub> or VOC equal to or exceeding 25 tons per year.

Potential VOC emissions from the landfill and proposed power station will be below 25 tons per year. The anticipated non-fugitive VOC emissions (those emitted from the existing landfill flare plus those emitted from the proposed engines) will total approximately 8 tons per year.

Potential NO<sub>x</sub> emissions from the landfill and proposed power station will be greater than 25 tons per year. NO<sub>x</sub> emissions from the three proposed engines at the power plant will be effectively limited to 22.5 tons per year, while potential NO<sub>x</sub> emissions from the open flare(s) will be approximately 13.6 tons per year. This site is therefore a major source under nonattainment NSR because the site total Potential NO<sub>x</sub> emissions are 36.1 tons per year (tpy).

Note: The flare NO<sub>x</sub> emission estimate is derived from LandGEM methane generation rates. At the time the generators were permitted, EDI predicted that the methane generation rate would be low enough that the flare(s) would not have to operate when the engines are operating; if the flare(s) is used only as backup when the engines are down, NO<sub>x</sub> emissions will be lower than 25 tons per year. However, since that time, the generation of LFG has dramatically increased, so that it is now expected that LFG will be in excess of that needed by the three engines.

Permit No. 4911-089-0323-V-01-0 limits NO<sub>x</sub> to 36.6 ppm @15%O<sub>2</sub> on each engine, which is equivalent to 22.5 tpy for the entire power station. This limit was proposed by the applicant and included in the permit to avoid NSR review at the time the generators were permitted to assure that the increase in NO<sub>x</sub> would be less than 25 tons per year.

## 2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

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

## 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 has disposed 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. 4953-089-0297-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to that narrative.

##### 40 CFR Part 63 Subpart AAAAA

40 CFR Part 63 Subpart AAAAA – “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. The Hickory Ridge Sanitary Landfill meets these criteria so it is subject to Subpart AAAAA. It has a permitted capacity of over 2.5 million cubic meters; 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. The compliance date for the control requirements of Subpart WWW was July 30, 2004.

There are not many requirements in Subpart AAAAA, 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 AAAAA also specifies the requirements for landfills that own or operate a bioreactor.

##### 40 CFR 60 Subpart WWW

40 CFR 60 Subpart WWW – “Standards of Performance for Municipal Solid Waste Landfills.” The Hickory Ridge landfill is subject to this NSPS because it was constructed after 1991, and has a permitted capacity exceeding 2.5 million cubic meters. 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. The compliance date for the control requirements of Subpart WWW was July 30, 2004.

#### 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 “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

The following conditions were found in Permit Amendment No. 4953-089-0297-V-01-1.

Condition 2.2.1 establishes 40 CFR Part 60 Subpart A as applicable to the landfill. While the initial Title V permit indicated that the landfill was subject to Subpart A in Table 3.1, it was omitted from Section 2 of the initial Title V permit.

Condition 2.2.2 establishes 40 CFR Part 60 Subpart WWW as applicable to the landfill. While the initial Title V permit indicated that the landfill was subject to Subpart WWW in Table 3.1, it was omitted from Section 2 of the initial Title V permit.

Condition 2.2.3 establishes 40 CFR Part 63 Subpart A as applicable to the landfill. This requirement became applicable January 16, 2004.

Condition 2.2.4 establishes 40 CFR Part 63 Subpart AAAA as applicable to the landfill. This requirement became applicable January 16, 2004.

Condition 2.2.5 establishes 40 CFR Part 61 Subpart A as applicable to the landfill. While the initial Title V permit indicated that the landfill was subject to Subpart A in Table 3.1, it was omitted from Section 2 of the initial Title V permit.

Condition 2.2.6 establishes 40 CFR Part 61 Subpart M as applicable to the landfill. While the initial Title V permit indicated that the landfill was subject to Subpart M in Table 3.1, it was omitted from Section 2 of the initial Title V permit.

### III. Regulated Equipment Requirements

#### A. Brief Process Description

This landfill accepts, manages, and disposes of municipal solid waste. Landfill gases from the landfill are collected in an active GCCS and then combusted in the IC engines owned and operated by Bio Energy (Georgia) LLC. Open flare(s) will serve as a backup control device.

#### 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 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, 4.2.2, 5.2.1 through 5.2.9, 6.1.7, 6.1.8, 6.2.1 through 6.2.19	CD01	Landfill Gas Collection System: Third-party IC engines and open flare(s)
	Fugitive Dust from Road	391-3-1-.02(2)(n)	3.4.1, 3.4.2, 6.1.7, 6.1.8	n/a	n/a

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

#### C. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

Equipment and Rule Applicability was discussed in the initial Title V permit narrative for Permit No. 4953-089-0297-V-01-0 issued November 3, 1999. However, at that time the facility was not yet subject to the landfill gas (LFG) control requirements of 40 CFR 60 Subpart WWW "Municipal Solid Waste Landfills." Therefore, that Title V permit did not contain the control requirements of Subpart WWW. The compliance date of the control requirements of Subpart WWW was July 30, 2004. These requirements were included in Permit Amendment No. 4953-089-0297-V-01-1 which was issued on September 24, 2004, to authorize the control of LFG by generators. See the Narrative of Amendment No. 4953-089-0297-V-01-1 for a discussion of the requirements.

The landfill was subject to the control requirements of Subpart WWW as of July 30, 2004. 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 at each wellhead is less than 55°C, and have either a nitrogen level less than 20 percent or an oxygen level less than 5 percent

at each wellhead. The surface methane concentration must be less than 500 ppm above background. The open flare(s) must be operated in accordance with 40 CFR 60.18. The third-party power station's IC engines must comply with the Subpart WWWW minimum NMOC destruction efficiency requirement of 98% (or have an outlet NMOC concentration of 20 ppm as hexane).

D. Compliance Status

See Section II.C. above.

E. Operational Flexibility

None requested.

F. Permit Conditions

The following conditions were found in Permit Amendment No. 4953-089-0297-V-01-1.

Condition 3.3.1 establishes the control requirements and operating standards of 40 CFR 60 Subpart WWWW for the GCCS.

Condition 3.3.2 requires that any flares be designed and operated in accordance with 40 CFR 60.18. This is a requirement of Subpart WWWW for open flares. While the power plant is expected to serve as the main NMOC control device, the flare(s) will serve as backup and thus be subject to Subpart WWWW.

Condition 3.3.3 establishes the bioreactor avoidance requirements of 40 CFR 63 Subpart AAAAA.

Condition 3.4.1 establishes the fugitive dust reduction measures required by Georgia Rule (n). While rule (n) is already specified in Condition 8.22.1 and 8.22.2 of the initial Title V permit, it is more appropriate to list applicable state rules in section 3.4.

Condition 3.4.2 establishes the Georgia Rule (n) 20% opacity limit for fugitive dust. While rule (n) is already specified in Condition 8.22.1 and 8.22.2 of the initial Title V permit, it is more appropriate to list applicable state rules in section 3.4.

#### 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 initial Title V Permit No. 4953-089-0297-V-01-0 are discussed in the permit narrative for that permit. Please refer to that narrative.

Condition 4.1.3, which lists the applicable test methods, was modified in Permit Amendment No. 4953-089-0297-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.

Condition 4.2.1 requires that an open flare undergo initial testing in accordance with 40 CFR 60.18 as required by 40 CFR 60 Subpart WWW. This testing involves opacity testing of the flare, exit velocity of the landfill gas at the flare outlet, and the landfill gas heating value. This was Condition 4.2.5 in Permit Amendment No. 4953-089-0297-V-01-1 and has been renumbered in the Title V Renewal.

Condition 4.2.2 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 was Condition 4.2.6 in Permit Amendment No. 4953-089-0297-V-01-1 and has been renumbered in the Title V Renewal.

Permit Amendment No. 4953-089-0297-V-01-1 removed Conditions 4.2.1 through 4.2.4 from the initial Title V permit. These conditions established the Tier 1, Tier 2, and Tier 3 NMOC estimate procedures, which are no longer applicable since the landfill has installed a gas collection and control system (GCCS).

###### 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 (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. All these conditions were added in Permit Amendment No. 4953-089-0297-V-01-1.

Condition 5.2.1 requires the use of a device to continuously measure and record the presence of flame from a flare, and the use of a device that measures gas flow rate to a flare at least once every 15 minutes. In lieu of a flow rate monitor, all bypass lines may be closed with a car-seal or lock-and-key (monthly inspections of the bypass seal(s) are required if seal(s) are used). Because the power station's IC engines will be the primary NMOC control devices, the condition states that the continuous temperature recording device need not be in operation when the landfill gas is not routed to any flare but to the power station.

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. Condition 5.2.4 details the procedures (as per Subpart WWW) that must be followed if the GCCS wellhead gas pressure is not negative. [This does not apply to wellheads that are attached only to passive flares because passive flares, by nature, operate under positive pressure. Hickory Ridge Landfill has indicated that they do not plan to use passive flares.] Excessive pressure must be reported as an exceedance per Condition 6.1.7.

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

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. 4953-089-0297-V-01-0 are discussed in the 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 have been carried over from the initial Title V Permit.

Condition 6.1.4 requires semiannual reports of excess emissions, exceedances, and excursions. This was Condition 5.3.1 in the initial Title V Permit and modified in Permit Amendment No. 4953-089-0297-V-01-1. It has been moved to Section 6 and renumbered as part of the Title V Renewal.

Conditions 6.1.5 and 6.1.6 for standard record keeping requirements are Conditions 5.3.2 and 5.3.3 from the initial Title V Permit. They have been moved to Section 6 and renumbered as part of the Title V Renewal.

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 AAAAA. This was originally Condition 6.1.4 in Permit Amendment No. 4953-089-0297-V-01-1.

Condition 6.1.8 concerning the Dust Suppression Plan is Condition 5.3.4 in the initial Title V Permit. It was modified in Permit Amendment No. 4953-089-0297-V-01-1. This condition has been moved to Section 6 and renumbered as part of the Title V Renewal.

Condition 6.2.1, concerning the design capacity report, has been carried over from the initial Title V Permit.

Condition 6.2.2, with procedures for calculating NMOC emissions, has been carried over from the initial Title V Permit. It has been modified in the Title V Renewal to remove any mention of the Tier 2 and Tier 3 NMOC emissions, since they are no longer applicable.

Condition 6.2.3 from the initial Title V Permit was deleted in Permit Amendment No. 4953-089-0297-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. Hickory Ridge has already submitted a GCCS plan, and the plan has been approved by the Division. Because this one-time requirement has been satisfied, it is deleted.

Conditions 6.2.4 through 6.2.7 from the initial Title V Permit have been carried over to the Title V Renewal Permit. The conditions have been renumbered and are now Conditions 6.2.3 through 6.2.6.

The following conditions were added in Permit Amendment No. 4953-089-0297-V-01-1.

Old Condition 6.2.9 required submittal of a GCCS equipment removal report, when appropriate, as per Subpart WWW. The condition has been renumbered as Condition 6.2.8 in the Title V Renewal Permit.

Old Condition 6.2.10 required that all records made during performance testing be kept on site for a minimum of 5 years as per Subpart WWW. The condition has been renumbered as Condition 6.2.9 in the Title V Renewal Permit.

Old Condition 6.2.11 required that records and maps of the GCCS system be kept on site for the lifetime of the system as per Subpart WWW. The condition has been renumbered as Condition 6.2.10 in the Title V Renewal Permit.

Old Condition 6.2.12 required that records of all exceedances be kept on site for five years as per Subpart WWW. The condition has been renumbered as Condition 6.2.11 in the Title V Renewal Permit.

Old Condition 6.2.13 required 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 has been renumbered as Condition 6.2.12 in the Title V Renewal Permit.

Old Condition 6.2.14 was added to require that the landfill record each date and time that landfill gas is switched away from the power station and to the flare(s). Because this switch is done manually, the person performing the switch can easily make a record of this occurrence. The condition has been renumbered as Condition 6.2.13 in the Title V Renewal Permit.

The U.S. EPA has proposed an amendment to 40 CFR 60 Subpart WWW. This amendment addresses issues regarding the sale of landfill gas to a third-party user. The proposed amendment requires that the landfill submit a notice to the gas transferee (in this case Bio Energy Hickory Ridge Power Station) informing them that they must comply with the provisions of Subpart WWW. Old Condition 6.2.15 contained the above-mentioned requirement for the notice. The condition has been renumbered as Condition 6.2.14 in the Title V Renewal Permit.

Old Conditions 6.2.16 and 6.2.17 detailed the asbestos requirements of 40 CFR 61 Subpart M as they apply to the landfill. These requirements were inadvertently omitted from the initial Title V

permit. These conditions have been renumbered as Conditions 6.2.15 and 6.2.16 in the Title V Renewal Permit.

Old Condition 6.2.18 required that the landfill keep a calculation 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 and thus subject to the bioreactor control requirements of Subpart AAAA. The requirement in the condition to update the calculations quarterly was added by EPD as the NESHAP did not provide guidance on how often this should be updated. The condition has been renumbered as Condition 6.2.17 in the Title V Renewal Permit.

Old Condition 6.2.19 required that the landfill notify the Division 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. The condition has been renumbered as Condition 6.2.18 in the Title V Renewal Permit.

Old Condition 6.2.20 required 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. The condition has been renumbered as Condition 6.2.19 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

- Not applicable

## 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 process.

## 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 comment period started on May 26, 2005 and ended on June 25, 2005. No comments were received from the public, company, and EPA.