

Facility Name: **Hall County Candler Road MSW LF**
 City: Gainesville
 County: Hall
 AIRS #: 04-13-139-00106

Application #: TV-15842
 Date Application Received: November 22, 2004
 Permit No: 4953-139-0106-V-02-0

Program	Review Engineers	Review Managers
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Toxics	NA	NA

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 **Hall County Candler Road MSW LF** 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: Hall County Candler Road MSW LF

2. Parent/Holding Company Name

Hall County Board of Commissioners

3. Previous and/or Other Name(s)

Initial Title V Permit No. 4953-139-0106-V-01-0 was issued in the name of "Candler Road MSW Landfill." No other previous names are identified.

4. Facility Location

1700 Oakbrook Drive
Gainesville, Georgia 30507

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

The facility is located in a county which is a part of the Atlanta Non-attainment Areas for the PM_{2.5} standard, and for the 8-hour ozone standard, The facility is not a major source for any air pollutant.

6. Class I Area Impacts

This landfill facility is located within 200 km of the Great Smoky National Park and Cohutta Wilderness Area Class I areas.

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
4953-139-0106-V-01-0	May 25, 2000	Initial Title V Permit

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)

This facility does not have a final product.

3. Overall Facility Process Description

This landfill facility receives municipal and industrial solid waste. The solid waste is deposited directly into the landfill and then covered with fill dirt.

4. Overall Process Flow Diagram

A process flow diagram is not applicable for the facility since it is a landfill with no processes other than the acceptance and disposal of solid waste.

E. Regulatory Status

1. PSD/NSR

The facility is considered a minor source with respect to PSD rules.

2. Title V Major Source Status by Pollutant

Table 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 ₁₀	✓			✓

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
SO ₂				
VOC	✓			✓
NO _x				
CO				
TRS				
H ₂ S				
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The Landfill MACT, 40 CFR Part 63 Subpart AAAA, (Federal Register-Vol. 68, No. 11/Thursday, January 16, 2003), is applicable to each area source MSW landfill with a design capacity greater than or equal to 2.5 million Mg and 2.5 million m³ and that has estimated uncontrolled NMOC emissions exceeding 50 Mg/yr. The design capacity (7.1 million m³) of this landfill is more than the above threshold, but the NMOC emissions rate is less than the threshold; therefore, the MACT standard is not currently applicable to this landfill site.

However, the landfill has been identified as potentially subject to 40 CFR 63 Subpart AAAA, as this rule also regulates bioreactors. These rules can be applicable to landfills that are above the capacity threshold, even if NMOC emissions are below the threshold. If the facility starts adding liquids, other than leachate, in a controlled fashion to the waste mass, the various provisions of Subpart AAAA, for a bioreactor, are triggered. Therefore, this permit includes the bioreactor avoidance provisions of 40 CFR 63 Subpart AAAA.

Note that the landfill facility will be required to comply with the requirements of this NESHAP by the date on which the landfill is required to install a GCCS and/or begins adding liquids, other than leachate, in a controlled fashion to the waste mass, which could trigger the provisions for a bioreactor.

The landfill is subject to 40 CFR Part 61 Subpart M – NESHAP for Asbestos because the landfill accepts and disposes of industrial and commercial waste, which may contain asbestos-containing material.

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	No
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. 4953-139-0106-V-02-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

40 CFR 60 Subpart WWW

The permit renewal application submitted by the Hall County Candler Road MSW LF indicates that the total design capacity of the landfill is 9,291,000 cubic yards (7.1 million cubic meters); the facility has accepted waste since 1997.

The current design capacity of the landfill is above the thresholds of 2.5 million cubic meters (m³) and 3.27 million cubic yards (yrd³); and the landfill was modified on or after May 30, 1991, the effective date of Subpart WWW. Therefore, the facility is subject to NSPS, 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills.

According to Subpart WWW regulations, the landfill was required to submit annual Tier 1 NMOC emission rate reports to the Division ever since exceeding 2.5 million cubic meters, until such time as the calculated NMOC emission rate is equal to or greater than 50 Mg NMOC per year or the landfill is closed. [The NSPS regulation also provides that, once the NMOC emission estimate exceeds 50 Mg per year, then the facility will have the option to either recalculate the NMOC emission rate as per the Tier 2 and or Tier 3 procedure or proceed to install a GCCS.]

Tier 1 NMOC emission rate report, dated January 8, 2003, for the year 2002, indicated a NMOC emission rate of 56.9 Mg/year. The facility therefore had the option either to install and operate a gas collection and control system (GCCS) within 30 months after the first NMOC emission calculation that exceeded 50 Mg/yr, or carry out Tier 2 testing and show emissions were less than 50 Mg/yr.

Hall County Candler Road MSW LF elected to carry out Tier 2 testing and recalculated the NMOC emission rate, based on Tier 2 calculations, and submitted the report for the year 2003. It indicated that the NMOC emissions from the landfill were 11.7 Mg/yr. The Tier 2 emission rate report for the year 2004, submitted in February 2005, indicated that the emissions are 13.88 Mg/yr. Both are well under the 50 Mg/yr threshold. Therefore, this landfill facility is currently not required to install and operate a regulated GCCS. The facility is required to recalculate and report its NMOC emissions rate each year, as indicated above, and to do a Tier 2 test at least every 5 years.

40 CFR Part 63 Subpart AAAA

The Landfill MACT, found in 40 CFR Part 63 Subpart AAAA, published in the Federal Register (Vol. 68, No. 11/Thursday, January 16, 2003), is applicable to any open landfill that accepted waste after November 8, 1987, that has estimated uncontrolled NMOC emissions exceeding 50 Mg/yr, and which meets one of the following criteria: (1) is a major source, (2) is collocated with a major source, or (3) is an area source with capacity greater than 2.5 million cubic meters (3.2 million cubic yards). Hall County Candler Road MSW LF accepted waste after November 8, 1987 and is an area source with capacity over 2.5 million cubic meters, but its estimated NMOC emissions do not exceed 50 Mg/yr at present; therefore, unless the facility is a bioreactor, it is currently not subject to these MACT standards.

Hall County Candler Road MSW LF has been identified as potentially subject to 40 CFR 63 Subpart AAAA as indicated in Section I E-Regulatory Status of this narrative. Since the landfill could be operated as a bioreactor, this permit includes conditions to address bioreactors.

C. Compliance Status

There are not any noncompliance issue exists.

D. Operational Flexibility

None applicable.

E. Permit Conditions

The facility-wide conditions put into the permit indicate the facility's general subjection to Subparts A and WWWW of the NSPS, Subparts A and M of the Part 61 NESHAPs, and Subparts A and AAAA of the Part 63 NESHAPs. Existing permit Condition No. 2.2.1 has been incorporated into this permit renewal. Existing Condition No. 2.3.1 is deleted from Section 2 of the Permit, because it is General Provision Condition 8.17.2.

Condition 2.2.1 establishes 40 CFR Part 60 Subpart A and Subpart WWWW as applicable to this municipal solid waste landfill.

Condition 2.2.2 establishes 40 CFR Part 61 Subpart A and Subpart M as applicable to the landfill for handling asbestos containing waste.

Condition 2.2.3 establishes 40 CFR Part 63 Subpart A and Subpart AAAA as applicable to the landfill, if the landfill operates as a bioreactor; otherwise this MACT is not applicable.

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is included in the narrative for Title V Permit No. 4953-139-0106-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
Clf1	MSW 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 60, Subpart AAAA 391-3-1-.02(2)(n)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 6.1.7, 6.2.1 – 6.2.15	NA	None

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

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in initial Title V Permit No. 4953-139-0106-V-01-0 is discussed in the initial Title V permit narrative. This is still correct, so please refer to this narrative.

Emission and Operating Caps:

The facility is not subject to any emission or operating cap.

Rules and Regulations Assessment:

The Rules and Regulation Assessment for Permit No. 4953-139-0106-V-01-0 is discussed in the initial Title V permit narrative. This is still correct, so please refer to this narrative.

Fugitive PM emissions are generated from the landfill site, due to daily truck travel over plant roads, as well as by other sources and activities including scraping, compacting, and loading of waste topsoil and daily cover, etc. While rule (n) is specified in Condition 8.22.1 and 8.22.2 of all Title V permits, because of the frequency of earth moving at landfills, it is also appropriate to include this applicable state rule in Section 3.4.

D. Compliance Status

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

E. Operational Flexibility

None applicable.

F. Permit Conditions

The existing initial Title V permit does not have any permit conditions in Part 3.0 for inclusion in the Title V renewal permit.

The permit conditions that were incorporated in Section 3 have been developed out of the requirements of the provisions found in 40 CFR Part 60 Subpart WWW, and 40 CFR 63 Subpart AAAA.

According to § 60.752, which contains Standards for air emissions from municipal solid waste landfills, once the NMOC emissions from a landfill, having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic, equal or exceed 50 megagrams per year, the Permittee is required to install a gas collection and control system. Therefore, the Permittee is required to annually recalculate the NMOC emissions, as per § 60.752(b), until it exceeds that threshold and then proceed to the installation of a GCCS. Condition 3.3.1a requires the Permittee to recalculate the NMOC emission rate annually and install a GCCS in accordance with the deadlines contained in the NSPS.

If the most recent annual NMOC emission rate report submitted shows emissions greater than or equal to 50 megagrams per year, the Permittee must submit a Gas Collection and Control System (GCCS) Design Plan to the Division within one (1) year of that report. The design plan shall be prepared by a Professional Engineer and be designed to meet the criteria in 40 CFR 60 Subpart WWW-“Standards of Performance for MSW Landfills”. The Permittee is required to install and operate this GCCS within 30 months after calculation. Therefore, Condition 3.3.1b requires the Permittee to submit a GCCS design plan and to install it within 30 months of the annual calculation that showed the emission rate equal to or greater than 50 megagrams per year. Condition 3.3.1 is a new condition. [Note that a GCCS need not be operated unless a landfill cell has been at final grade for at least 2 years or waste has been in any part of the landfill for at least 5 years.]

Condition 3.3.2 establishes the bioreactor avoidance requirements of 40 CFR 63 Subpart AAAA. This is a new condition.

Fugitive PM emissions generated due to daily truck travel over plant roads, and emissions associated with scraping, compacting, and loading of waste, topsoil, or daily cover, etc. are subject to Rule (n). Therefore, Conditions 3.4.1 and 3.4.2 are included to 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 includes the Georgia Rule (n) 20% opacity limit for fugitive dust. This is a new condition.

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

Hall County Candler Road MSW LF is uncontrolled and is subject to Subpart WWW. Subpart WWW and this permit contain specific testing requirements to determine NMOC emissions for an uncontrolled landfill. Conditions No. 4.2.1 through 4.2.4 provide the procedures to be followed to calculate the NMOC emissions. Note that these conditions are similar to existing permit Conditions No. 4.2.1 through 4.2.4.

The latest calculated NMOC emissions for the year 2004, based on Tier 2, did not exceed the 50 megagrams per year threshold. Therefore, the facility is not required to submit a Gas Collection and Control System (GCCS) plan at this time but must continue to submit annual emission rate estimates. If any annual emission rate estimate, based on Tier 2, submitted to the Division is greater than or equal to 50 megagrams per year, a GCCS plan is required to be submitted, unless the landfill chooses to recalculate the emission rate using Tier 3.

The facility determined a site-specific NMOC concentration of 678.27 ppm in the year 2003. It is required to be retested every five years by § 60.754 (a)(3)(iii). As per Subpart WWW, Condition 4.2.5 requires the Permittee to submit a GCCS design plan and to install and operate it as specified in Condition 3.2.1.b, if and when NMOC emissions exceed 50 Mg/yr. This is a new condition. Condition 4.2.6 requires the Permittee to conduct a retest to determine the site-specific NMOC concentration no later than March 31, 2008. This is a new condition.

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

Hall County Candler Road MSW LF is uncontrolled and is subject to Subpart WWW. The Permittee does not yet have a GCCS. Subpart WWW and this permit do not contain any specific monitoring requirements for an uncontrolled landfill.

C. Compliance Assurance Monitoring (CAM)

CAM is not applicable since there is no pollutant-specific emission unit (PSEU), and no air pollution control equipment.

Note that Conditions No. 5.3.1 and 5.3.2, regarding record keeping and reporting requirements, of the existing permit, have been moved to Section 6.0, as Conditions 6.1.5 and 6.1.6, per the current Title V permit template. Condition No. 5.3.3 is moved to Section 6.0, as Condition No. 6.2.14

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. 4953-139-0106-V-01-0 are discussed in the initial Title V permit narrative for this permit. Much is still accurate, so please refer to this narrative.

The Tier 2 testing report submitted indicated that the NMOC emission rate is less than the 50 Mg /yr threshold; the facility is required to recalculate the NMOC emission rate annually as required by § 60.752(b)(1), by using the procedure specified in § 60.754(a), until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams per year. Condition No. 6.2.1 requires that this emission rate be submitted by January 30 of each year. If and when the calculated annual emission rate equals or exceeds 50 megagrams per year, per Condition 6.2.1(a), and (b), the facility has the option to submit a GCCS design plan to comply with § 60.752(b)(2) or conduct Tier 3 testing to determine a site-specific methane generation rate constant (k) and recalculate the NMOC emission rate. Condition 6.2.1 is similar to existing permit Condition No. 6.2.1.

If the landfill chooses to recalculate the emission rate using Tier 3, and the recalculated emission rate is less than 50 megagrams per year, the landfill must continue submitting annual emission rate estimates. Condition 6.2.2 requires the Permittee to submit a revised NMOC emission rate report within one year of the first calculated emission rate exceeding 50 megagrams per year. If the resulting NMOC emission rate is equal to or greater than 50 megagrams per year, the Permittee must comply with Condition 6.2.3.

Note that a landfill is not required to submit an annual emission rate estimate if it is controlled by a GCCS, in accordance with Subpart WWW, and the control system is operating properly. Condition 6.2.4 exempts the Permittee from needing to submit annual NMOC emission reports once a GCCS is installed and operating properly. This is similar to existing permit Condition No. 6.2.4

Condition No. 6.2.5 requires the Permittee to submit an amended design capacity report if and when there is any increase in the maximum design capacity of the landfill. This is a new condition.

Condition No. 6.2.6 requires keeping on-site records of the maximum design capacity, the amount of solid waste in place, and the year-by-year acceptance rate as required by § 60.758(a). This is similar to existing permit Condition No. 6.2.6

As per Condition No. 6.2.7, the Permittee is authorized to exclude any areas of deposited asbestos or other nondegradable waste from being part of a required 40 CFR 60 Subpart WWW GCCS. To do that the facility must comply with the applicable provisions and reporting requirements in 40 CFR 61 Subpart M which are found in § 61.154 (Condition 6.2.8). The landfill facility must maintain records containing the quantity and location of all the asbestos placed in the landfill. The landfill is responsible for reporting any discrepancies in the quantity of waste received. This Landfill is responsible for maintaining these records for two years. Once the facility is closed, the records must be submitted to the Administrator of the asbestos NESHAP program (Condition No. 6.2.9). These are similar to existing permit Conditions No. 6.2.3, 6.2.7, and 6.2.8.

As per Condition No. 6.2.10, the Permittee is authorized to exclude any nonproductive area of the landfill from being part of a required 40 CFR 60 Subpart WWW GCCS, provided it contributes less than 1 percent of the total amount of NMOC emissions from the landfill. This is a new condition.

Condition 6.2.11 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 this information will give the Division an indication that the landfill may become a bioreactor at some point. This is a new condition.

Condition 6.2.12 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.] This is a new condition.

Condition 6.2.13 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. This is a new condition.

Condition No. 6.2.14 requires the Permittee to develop and implement a Dust Suppression Plan to assure compliance with Georgia Air Quality Rule (n) for fugitive dust. Failure to follow the procedures of Dust Suppression Plan must be reported, as an excursion, as required by Condition No. 6.1.7. This is similar to existing permit Condition No. 5.3.3.

Condition 6.2.15 requires the Permittee to submit a Landfill Closure Report after it stops accepting waste. This is similar to existing permit Condition No. 6.2.5.

VII. Specific Requirements

A. Operational Flexibility

- None Applicable.

B. Alternative Requirements

- None Applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

- A complete list of insignificant activities is included at the end of the Title V Permit as Attachment B. These insignificant units may also be found in section D1-Insignificant Activities Checklist of the Title V electronic application

D. Temporary Sources

- None.

E. Short-Term Activities

- None. The applicant did not include short-term activities in their Title V renewal application. However, Condition 7.6.1, regarding maintenance of records for construction of landfill cell and capping thereof, of the initial Title V permit, has been included in the renewal permit. These short-term activities are normal at a landfill.

F. Compliance Schedule/Progress Reports

- None Applicable.

G. Emissions Trading

- None Applicable.

H. Acid Rain Requirements

- None Applicable.

I. Stratospheric Ozone Protection Requirements

- Candler Road MSW Landfill has air conditioners or refrigeration equipment that uses CFC's, HCFC's or other stratospheric ozone depleting substances as listed in 40 CFR Part

82, Subpart A, Appendices A and B. The facility is also subject to 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction.

The facility is subject to 40 CFR Part 82, Subpart A “Production and Consumption Control”, Appendix A and B. The Title V permit application indicates that the facility does not have any air conditioner or piece of refrigeration equipment that contains a refrigerant charge of greater than 50 lbs. The Title V permit application also indicates that the facility personnel do not maintain, service, repair or dispose of any motor vehicle air conditioners (MVAC’s) or appliances. Therefore, the facility is not subject to 40 CFR 82, Subpart B “Servicing of Motor Vehicle Air Conditioners.”

The facility has indicated that they remove CFC’s out of appliances, and either sell it or send it to a certified vendor for destruction. The metals from the appliances are recycled.

J. Pollution Prevention

- None Applicable.

K. Specific Conditions

- None.

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.

New Conditions No. 8.23 (Solvent Metal Cleaning) and No. 8.24 (Incinerators), and No. 8.25 (Volatile Organic Liquid Handling and Storage) are added to update “Part 8.0 General Provisions” Section of the initial Title V Permit in accordance with the latest Title V Permit template. Also a new Condition 8.26.1 is added, as per requirements of U.S. EPA Region 4, to clarify the use of any credible evidence and information

Addendum to Narrative

The 30-day public review started on November 29, 2005 and ended on December 27, 2005. No comments were received by the Division from the facility or the public or EPA.