

Facility Name: **Houston County MSW Landfill**  
 City: Kathleen  
 County: Houston  
 AIRS #: 04-13-153-00048

Application #: TV-15961  
 Date Application Received: January 18, 2005  
 Date Application Deemed  
 Administratively Complete: NA  
 Date of Draft Permit:  
 Permit No: 4953-153-0048-V-02-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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<b>Toxics</b>	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 in 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 Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I 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 the **Houston County MSW Landfill** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Facility Identification**

1. Facility Name: Houston County MSW Landfill
2. Parent/Holding Company Name  
Houston County Board of Commissioners
3. Previous and/or Other Name(s)  
SR 247 Klondike Municipal Solid Waste Landfill
4. Facility Location  
2080 Georgia Highway 247 South  
Kathleen, Georgia 31047
5. Attainment or Non-attainment Area Location  
The facility is located in an attainment area.
6. Class I Area Impacts  
The facility is not located within 200 km of any 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: List of Current Permits as Amended**

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
4953-153-0048-V-01-0	July 17, 2000	✓	
4953-153-0048-V-01-1	Oct 27, 2004	✓	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
4953-153-0048-V-01-0	Initial Title V permit
4953-153-0048-V-01-1	502(b)(10) permit amendment to authorize the construction and operation of a non-regulated GCCS.

#### 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)

##### 3. Overall Facility Process Description

Houston County MSW Landfill receives, manages, and disposes of solid waste. Landfill gas generated through the decomposition of wastes is collected in a landfill gas collection system. The landfill gas is routed to a 500 scfm open flare for combustion. The GCCS is installed and operated voluntarily. The GCCS is not required by air quality rules.

##### 4. Overall Process Flow Diagram

An overall process flow diagram was not provided with the Houston County Landfill Title V Application.

#### E. Regulatory Status

##### 1. PSD/NSR

The facility is a true minor source for PSD. Also nonattainment NSR is not applicable because the source is located in an attainment area.

## 2. Title V Major Source Status by Pollutant

If a pollutant is not emitted from the facility, state "n/a" for that pollutant in Table 3 below (2nd column). For each pollutant emitted from the facility, place a mark (✓) in the appropriate box in Table 3 below (3rd, 4th, or 5th column).

**Table 3: 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 <sub>10</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes			✓
NO <sub>x</sub>	Yes			✓
CO	Yes			✓
TRS	Yes			✓
H <sub>2</sub> S	Yes			✓
Individual HAP	Yes			✓
Total HAPs	Yes			✓

## 3. MACT Standards

Houston County MSW Landfill is not currently subject to any MACT standards.

## 4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 – NSPS*	Yes
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

\*Houston Landfill is currently subject to NSPS, but the authorized installation and operation of the GCCS is not regulated by it so far.

## Regulatory Analysis

### II. Facility Wide Requirements

#### A. Emission and Operating Caps:

The facility currently does not have any emission or operating limits.

#### B. Applicable Rules and Regulations

Applicable rules and regulations specified in Permit No. 4953-153-0084-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to that narrative.

Changes since the issuance of the initial Title V permit:

#### **40 CFR Part 60 Subpart WWW – “Standards of Performance Municipal Solid Waste Landfills”**

The initial Title V permit issued on July 17, 2000 subjected the Houston County MSW Landfill facility to Georgia’s Air Quality Rule 391-3-1-.02(2)(ggg), which was not correct. In fact this landfill was and is subject to Federal Rule 40 CFR 60, Subpart WWW, because the landfill was constructed, reconstructed or modified after May 30, 1991, as indicated in the initial Title V permit application. Therefore, applicability of Subpart WWW has been indicated, in place of Rule (ggg), in the permit renewal and all permit conditions contain references in accordance with this federal rule.

#### **40 CFR Part 63 Subpart AAAA – “National Emission Standards for Municipal Solid Waste Landfills”**

The Landfill MACT, 40 CFR Part 63 Subpart AAAA, 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 m<sup>3</sup> and that has estimated uncontrolled NMOC emissions exceeding 50 Mg/yr. The MACT standard is not currently applicable to this landfill because the NMOC emissions, based on Tier 2 calculations, are less than 50 megagrams per year threshold; thus this landfill is not required to install and operate a GCCS. However, if and when the control requirements of Subpart WWW become applicable, the landfill will become subject to Subpart AAAA. Then the facility must comply with the requirements of this NESHAP by the date on which the landfill is required to install a GCCS.

However, 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. Also, if the facility becomes subject to Subpart AAAA, it will also be subject to Subpart A, the NESHAP General Provisions.

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 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 [or 391-3-1-.02(8)(b)72], and 40 CFR 63 Subpart AAAA.

C. Compliance Status

The facility has submitted a signed Certificate with the Title V renewal application. This indicates that the source believes itself to be in compliance with all Air Quality Rules as of the application dates.

D. Operational Flexibility

There were no operational flexibility requests in the Title V renewal application.

E. Permit Conditions

The only facility wide condition put into the initial Title V permit is Condition No. 2.2.1, which indicates the facility's general subjection to Subpart A and Subpart M of the Part 61 NESHAP for "Asbestos," and Subpart Kb of the Part 60 NSPS for "Volatile Organic Liquid Storage Vessels." Note that Subpart Kb is not included in the renewal permit as this rule is no longer applicable.

New Condition 2.2.1 establishes the Federal Rule Standards of 40 CFR 60 Subpart A, General Provisions, and Subpart WWW, NSPS for Municipal Solid Waste Landfills, as applicable to this landfill. Note that this rule is incorporated and adopted by reference per GA Rule 391-3-1-.02(8)(b)72 for landfills. Rule (ggg) was incorrectly referenced in the initial Title V permit for this facility; this landfill was subject to Subpart WWW.

Condition 2.2.2 establishes the Federal Rule Standards of 40 CFR 61 Subpart A, General Provisions, and Subpart M, NESHAP for Asbestos, as applicable to the landfill.

Condition 2.2.2 establishes the Federal Rule Standards of 40 CFR 63 Subpart A, General Provisions, and Subpart AAAA, the NESHAP for Municipal Solid Waste Landfills, as potentially applicable to the landfill.

Old Condition 2.3.1, which was included to establish the applicability of GA Rule 391-3-1-.02(2)(ggg) to existing MSW landfills, has been deleted because this landfill is subject to the federal rule.

Note that existing permit Condition No. 2.3.2 (incorrectly numbered as 2.3.1), regarding Georgia Rule 391-3-1-.02(2)(a)1, is a standard template condition for operational practices; it has been moved and renumbered as Condition 8.17.2.

**III. Regulated Equipment Requirements**

**A. Brief Process Description**

Houston County MSW Landfill receives municipal and industrial solid waste. The solid waste is deposited directly into the landfill and then covered with fill dirt. The decomposition of the deposited waste produces landfill gas, which consists of methane and small quantities of other compounds. The facility has installed an open flare to control emissions collected by a gas collection and control system (GCCS) designed to control methane migration in a non-Subtitle D section of the landfill. The flare is designed to process 500 scfm of landfill gas with a destruction efficiency of at least 98% for VOC and NMOC emissions. The operation of the GCCS and flare are currently voluntary because this landfill is currently not required, based on NMOC Tier 2 calculations, to operate a regulated GCCS.

**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
0001	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* GA Rule 391-3-1-.02(b)	2.2.1, 2.2.2, 2.2.3, 3.3.1, 3.4.1, 3.4.2, 3.4.3, 4.2.1-4.2.5, 6.1.7, 6.2.1-6.2.12, 6.2.14, 6.2.15	None  CD01	Gas Collection and Control System (GCCS)  Open Flare [Installed and operated voluntarily]
0002	Fugitive Dust	GA Rule 391-3-1-.02(2)(n)	6.1.7, 6.2.13	None	NA

- Generally applicable requirements contained in this permit may also apply to emission units listed above.
- \*40 CFR Part 63 requirements are not currently applicable, but could become applicable during the permit term if the facility is required to install a GCCS.

**C. Equipment & Rule Applicability**

**Emission and Operating Caps –**

The Landfill does not have any emission or operating limits in the initial Title V permit or in the permit amendment dated Oct 27, 2004.

**Applicable Rules and Regulations -**

Applicable rules and regulations specified in Permit No. 4953-059-0084-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to that narrative.

Federal rule 40 CFR 60, Subpart WWW- “Standards of Performance for Municipal Solid Waste landfills,” requires that the facility must calculate and submit annual NMOC emissions estimates. When the annual emission estimate exceeds 50 Mg of NMOC, then a control and collection system must be put into place. The NMOC emission rate has not yet exceeded the 50 Mg

threshold using Tier 2; therefore, the facility is only required to recalculate the NMOC emission rate annually as required by § 60.752(b)(1) and by using the procedure specified in § 60.754 until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, or the landfill is closed.

The Landfill MACT, 40 CFR Part 63 Subpart AAAAA, as indicated earlier, is not applicable to the facility. However, as Subpart AAAAA also contains requirements for bioreactors, therefore this subpart requires that landfills using bioreactors must control the landfill gas from bioreactors earlier than would be required in the NSPS. Thus this part of the MACT is potentially applicable in case the landfill starts adding any liquids other than leachate.

40 CFR Part 60, Subpart Kb – “National Emission Standards for Volatile Organic Liquid Storage Vessels”

The initial Title V application submitted indicated that the facility had one leachate storage tank of 350,000 gallons (1325 m<sup>3</sup>) capacity, which was subject to 40 CFR Part 60, Subpart Kb for Volatile Organic Liquid Storage Vessels [Note that this leachate storage tank was included in table 3.1 of initial title V permit, as an emission unit.]. However, this rule has been amended (published in the Federal Register on 10-15-03). As per the amended rule, this subpart does not apply to storage vessels with a capacity greater than or equal to 151m<sup>3</sup> storing a liquid with maximum true vapor pressure less than 3.5 kPa. The capacity of the leachate storage tanks of the facility is more than 151 m<sup>3</sup>, but the leachate vapor pressure is similar to water and thus well below the threshold of 3.5 kPa. Therefore, NSPS 40 CFR 60, Subpart Kb is no longer applicable to the leachate storage tank of the facility and as such this tank has not been included in the Emission Units Table 3.1. [The Permittee has included this tank in Section D6-“Insignificant Activities based on Emission levels” of the Title V renewal application.]

Georgia Rule 391-3-1-.02(2)(b) Visible Emissions

The facility shall not allow emissions from any air containment source the opacity of which is equal to or greater than forty (40) percent. The landfill facility is operating an open flare, which is used to destroy LFG. This flare is not regulated by Subpart WWW and no testing or monitoring is required, but under GA Rule (b)-“Visible Emissions,” the facility is not allowed to discharge emissions having opacity equal to or greater than 40 percent. The Permittee must demonstrate that the flare installed is in compliance with the Georgia rules for visible emissions.

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 new permit conditions that are incorporated in Section 3 of the Title V permit have been developed out of the requirements of the provisions found in the NSPS and the NESHAP for Municipal Solid Waste Landfills.

Since the GCCS installed is voluntary and is not required by Subpart WWW, the system will not be subject to the performance specifications, or monitoring requirements of Subpart WWW. Thus no conditions related to the installation and operation of the GCCS and flare are included in this permit renewal.

Condition 3.3.1 establishes the bioreactor avoidance requirements of 40 CFR 63 Subpart AAAA.

New Conditions No. 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 No. 3.4.2 establishes the Georgia Rule (n) 20% opacity limit for fugitive dust. The Permittee has included fugitive emissions in "Section D8-Fugitive Emissions," and has assigned emission unit ID No. 0002 to it.

#### 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

Houston County MSW Landfill is uncontrolled and is subject to Subpart WWW. Subpart WWW and this permit contains 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.

Note that existing Condition No. 4.2.3 has been modified to update the testing procedure. The facility has already exceeded the 50 Mg per year NMOC emission rate using the Tier 1 procedure, carried out the testing to determine the site-specific NMOC concentration and started calculating the NMOC emissions by Tier 2 method. Therefore, the Tier 1 testing method has been removed from this condition.

Condition No. 4.2.5 is a new condition in the Title V Renewal permit. This condition states the date by which the facility must conduct retesting to determine the site-specific Non-Methane Organic Compounds (NMOC) concentration of the landfill gas. This test must be performed every five years, to retain authorization to calculate the NMOC emissions rate using Tier 2 equations.

The Landfill uses an open flare to control NMOC emissions from the landfill on a voluntary basis; therefore no performance testing for the visible emissions from the flare is required under GA Rule (b).

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

No applicable requirements.

**V. Monitoring Requirements (with Associated Record Keeping and Reporting)****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**

Houston County MSW Landfill does not yet have a regulated GCCS and thus the landfill is considered uncontrolled. Subpart WWW and this permit do not contain any specific monitoring requirements for an uncontrolled landfill.

Note that existing permit Conditions No. 5.3.1, 5.3.2, and 5.3.3, regarding record keeping and reporting requirements, have been moved to Section 6.0, as Conditions No. 6.1.4, 6.1.5, and 6.1.6, per the current Title V permit template. Old Condition No. 5.3.4, requiring a dust suppression plan, is moved to Section 6.0. This is new Condition No. 6.2.13.

**C. Compliance Assurance Monitoring (CAM)**

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

## **VI. Other 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**

Note that the GCCS was installed and is being operated by the facility voluntarily. The GCCS, including an open flare, will not be subject to the performance specifications, monitoring, record keeping, or reporting requirements required under Subpart WWW. Thus no new conditions for the GCCS have been included in this permit.

Record keeping and reporting requirements specified in initial Title V Permit No. 4953-153-0048-V-01-0 are discussed in the initial Title V permit narrative for this permit. Most of the discussion is still accurate, so please refer to this narrative.

New Condition No. 6.1.7 details the excess emissions, exceedances, excursions, and other information that must be reported for each period. The only excursion defined is failure to follow the dust suppression plan required in Condition No. 6.2.13.

According to Subpart WWW regulations, the landfill is required to submit annual Tier 1 NMOC emission rate reports to the Division 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. Further, the NSPS regulation requires 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 Tier 2 and or Tier 3 procedure, or proceed to install a GCCS. Once the decision is made to install a GCCS, the facility must submit a GCCS design plan, prepared by a professional engineer, to the Division within one (1) year after the first annual report in which the NMOC emission rate equals or exceeds 50 Mg per year. The Permittee is required to install a GCCS within 30 months after that initial report.

The landfill performed a Tier 2 test (1997) to determine the site-specific NMOC concentration, after Tier 1 NMOC emission rate exceeded 50 Mg/yr. The results of Tier 2 testing indicated a NMOC concentration of 228.13 ppm as hexane and NMOC emission rates less than 50 Mg/yr at least through the year 2002. The facility is required to recalculate the NMOC emission rate, using Tier 2 testing procedures, annually until such time as the calculated NMOC emission rate is equal to or greater than 50 Mg/year, or the landfill is closed. The site-specific NMOC concentration determined in 1997 was only valid up to May 14, 2002. The NMOC concentration was re-determined May 13-14, 2002. As per this test result, the NMOC concentration was 270 ppm and the emission rate was calculated to be 15.4 Mg/yr. Using the Tier 2 sampling results to calculate NMOC emissions, on January 20, 2005, they indicated that the NMOC emission rate

from the landfill is still less than the NSPS threshold of 50 Mg per year. It has been estimated that the NMOC emission rate will not exceed 50 Mg/yr through at least 2007. The NMOC concentration determined in May 2002 is valid for five years, so the facility is required to determine a new value for NMOC concentration by May 13, 2007. With these Tier 2 results, this landfill is not required to install a gas collection and control system (GCCS) at this time. [Note that once the facility is required by the NSPS to install a collection system, then the facility must submit an application to amend the Title V permit to incorporate conditions to comply with the installation and operation of the GCCS in accordance with Subpart WWW.]

Condition No. 6.2.1 requires the Permittee to submit the NMOC emission rate annually by January 30 of each calendar year. If the NMOC emission rate exceeds 50 Mg/yr, the Permittee may choose to recalculate emissions by using the Tier 3 procedure. This is similar to existing Condition No. 6.2.1.

If the Tier 3 values are determined, Conditions No. 6.2.2 and 6.2.3 require the Permittee to submit NMOC emissions report based on Tier 3 procedure until the emissions are less than 50 Mg/yr, and to submit a GCCS design plan if and when the annual emission rate exceeds the threshold limit.

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 such a GCCS is installed and operating properly.

Condition No. 6.2.5 requires keeping on-site records of the maximum design capacity, amount of solid waste in place, and the year-by-year acceptance rates as required by 40 CFR 60.758(a).

As per Condition No. 6.2.6, the Permittee is authorized to exclude any areas of deposited asbestos or other nondegradable waste from being part of a required Subpart WWW GCCS.

The facility must comply with the applicable provisions and reporting requirements in 40 CFR 61 Subpart M, which are found in § 61.154 (Condition No. 6.2.7). 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. Houston County MSW 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. 6.2.8).

As per Condition No. 6.2.9, 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.

New Condition 6.2.10 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. This is a new condition.

New Condition 6.2.11 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 this 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.

New Condition 6.2.12 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. 6.2.13 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. 5.3.4.

Condition No. 6.2.14 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.

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. 6.2.6.

**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

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

Houston County MSW Landfill has air conditioners or refrigeration equipment that uses CFC's, HFC's or other stratospheric ozone depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B. 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.”

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 current 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**

A public notice was placed in the "The Houston Home Journal" (legal organ for Houston County) on March 30, 2006. The 30-day public review period ended on May 1, 2006. The Division did not receive any comments.