

**TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW**

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Facility Name: **Taylor County Landfill**

City: Mauk

County: Taylor

AIRS #: 04-13-269-00014

Application #: 15323

Date SIP Application Received: N/A

Date Title V Application Received: May 4, 2004

Permit No: 4953-269-0014-V-01-2

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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**Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. 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) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative

**I. Facility Description**

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

**Table 1: Current Title V Permit and Amendments**

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
4953-269-0014-V-01-0	1/29/01	x	
4953-269-0014-V-01-1	7/23/03	x	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
4953-269-0014-V-01-0	Initial Title V permit for the landfill
4953-269-0014-V-01-1	Significant Modification to allow the transfer of landfill gas to be used as fuel in third-party engines.

B. Regulatory Status

1. PSD/NSR/RACT

The landfill and the Taylor County LFGTE Power Station (located on the landfill property) are considered by the Division to be one site for the purposes of Title V and PSD applicability. The site, in current operations, consisting of the landfill and four landfill gas-fueled engines at the power station, is a minor source under PSD. The power station has submitted Application No. 14793 to install four additional engines. Once the engines are installed, this site will be a PSD major source, because CO emissions will exceed 250 tons per year.

Nonattainment NSR does not apply because the facility is located in a county deemed to be in attainment for all pollutants.

2. Title V Major Source Status by Pollutant

**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	x			x
PM <sub>10</sub>	x			x
SO <sub>2</sub>	x			x
VOC	x			x
NO <sub>x</sub>	x	x		
CO	x	x		
TRS	x			x
H <sub>2</sub> S	x			x
Individual	x			x
Total HAPs				x

**II. Proposed Modification**

A. Description of Modification

Taylor County landfill seeks a minor modification without construction to allow them to transfer landfill gas collected in the existing gas collection and control system (GCCS) to up to four additional third-party landfill gas-fueled engines.

This request is precipitated by Taylor County LFGTE Power Station's permit application 14793 to install up to four additional engines at their plant, increasing the total number of engines to eight.

On July 23, 2003, the Division issued the landfill a permit amendment to allow the transfer of landfill gas to a third-part user (Taylor County Power Station, in this case). The only part of the permit amendment that mentions the number of engines is Section 1.0 Facility Description. Since the facility description states that landfill gas will be transferred to up to four engines, this description must be modified to include the additional four engines proposed by Taylor County LFGTE Power Station.

Please see the narrative for the 502(b)(10) permit based on Application No. 14793 for the Taylor County Power Station for more details.

**B. Emissions Change**

The modification in the facility description proposed in Application 15323 will result in no emissions changes at the landfill itself.

Because the landfill and the power station are considered one site for the purposes of Title V and PSD applicability, the addition of up to four engines at the power station will be considered in this review for the landfill permit. The table below summarizes the emissions changes due to addition of four engines by the power station. It does not reflect the landfill’s decreased dependency on the open flare that will result from the addition of more landfill gas-fueled engines.

**Table 4: Emissions Change Due to Modification**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Net Potential Emissions Increase (Decrease) (tpy)</b>
PM	x	10.2	10.2
PM <sub>10</sub>	x	10.2	10.2
SO <sub>2</sub>	x	2.8	2.8
VOC	x	9.6	9.6
NO <sub>x</sub>	x	62.4	62.4
CO	x	187.2	187.2
TRS	x	0	0
H <sub>2</sub> S	x	0	0
Individual HAP	x	0	0
Total HAPs	x	0	0

Please see the narrative for the 502(b)(10) permit based on Application No. 14793 for the Taylor County Power Station for more details.

**C. PSD/NSR Applicability**

PSD permitting is not applicable to this modification, although the addition of the four engines at the power plant will make the landfill/power plant site a major source under PSD. The existing site is considered a minor source under PSD because the potential to emit for each PSD-regulated pollutant is less than 250 tons per year. Future potential emissions of CO will now exceed 250 tons per year. The power station’s addition of four engines is considered “one-time doubling” PSD avoidance.

Please see the narrative for the 502(b)(10) permit based on Application No. 14793 for the Taylor County Power Station for more details.

**III. Facility Wide Requirements**

A. Emission and Operating Caps

No Changes.

B. Applicable Rules and Regulations

No Changes.

C. Compliance Status

No noncompliance issues are known at the landfill.

D. Operational Flexibility

No Changes.

E. Permit Conditions

No changes; only the process description in Part 1.0 is modified to reflect the addition of four engines at the power station.

**IV. Regulated Equipment Requirements**

A. Brief Process Description

Landfill gas collected by the GCCS will be routed to up to eight landfill gas-fueled engines at the power station. The engines will burn the landfill gas to produce electricity for sale.

B. Equipment List for the Process

No Changes.

C. Equipment & Rule Applicability

No Changes.

D. Compliance Status

See Section III.C of the narrative.

E. Operational Flexibility

No Changes.

F. Permit Conditions

No Changes.

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

No Changes.

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

No Changes.

**VII. Other Record Keeping and Reporting Requirements**

No Changes.

**VIII. Specific Requirements**

A. Operational Flexibility

No Changes.

B. Alternative Requirements

No Changes.

C. Insignificant Activities

No Changes.

D. Temporary Sources

No Changes.

E. Short-Term Activities

No Changes.

F. Compliance Schedule/Progress Reports

No Changes.

G. Emissions Trading

No Changes.

H. Acid Rain Requirements

No Changes.

I. Prevention of Accidental Releases

No Changes.

J. Stratospheric Ozone Protection Requirements

No Changes.

K. Pollution Prevention

No Changes.

L. Specific Conditions

No Changes.

**Addendum to Narrative**

The 45-day EPA review started on May 27, 2004 and ended on July 11, 2004. Comments were not received by the Division.