

TITLE V APPLICATION REVIEW

Facility Name: **City of Thomasville Municipal Solid Waste Landfill**

City: Thomasville

County: Thomas

AIRS #: 04-13-275-00066

Application #: TV- 11515

Date Application Received: June 15, 1999, Revised July 9, 1999

Date Application Deemed

Administratively Complete: August 11, 1999

Date of Draft Permit:

Permit No: 4953-275-0066-V-01-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V 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 proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to the City of Thomasville Municipal Solid Waste 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 public participation process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: City of Thomasville Municipal Solid Waste Landfill
2. Parent/Holding Company Name: Thomas County, Georgia
3. Previous and/or Other Name(s): No previous names identified
4. Facility Location: Located southeast of Thomasville approximately 1.4 miles east of SR 333 and US Route 19 on Sunset Drive.
Thomasville, Georgia 31799 (Thomas County)

5. Attainment or Non-attainment Area Location:

Area is designated as attainment area for all criteria pollutants.

6. Class I Area Impacts

This facility is located within 100 km of the Bradwell Bay and St. Marks 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
n/a	n/a	n/a	n/a

Table 2: Comments on Specific Permits

Permit Number	Comments
n/a	n/a

D. Process Description

1. SIC Code(s): Major - 4953 (Operation of a municipal solid waste landfill)
Minor - None
2. Description of Product(s): This facility does not have final products.
City of Thomasville Landfill processes general waste.

TITLE V APPLICATION REVIEW

3. Overall Facility Process Description:

City of Thomasville Landfill receives municipal and industrial solid waste. The waste is deposited directly into the landfill, compacted, and then covered with fill dirt.

4. Overall Process Flow Diagram (optional)

A landfill process flow diagram was not provided with the City of Thomasville Landfill Title V application.

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 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 ₁₀	yes			✓
SO ₂	yes			✓
VOC	yes	✓*		
NO _x	yes			✓
CO	yes			✓
TRS	yes			✓
H ₂ S	yes			✓
Individual HAP	yes			✓
Total HAPs	yes			✓

* Approximation based on Tier 1 emission calculations

3. MACT Standards

The City of Thomasville Landfill is not currently subject to any MACT standards.

4. Program Applicability

Program Code	Applicable (Yes/No)
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:

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

B. Applicable Rules and Regulations

- Rules and Regulations Assessment - The facility is currently subject to NSPS, 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills. The City of Thomasville Landfill has a design capacity of 7.4 MMyrd³ and the landfill was expanded after the May 30, 1991 affective date. Using Tier 1 the facility calculated their NMOC emission rate to be 172.7 Mg per year (for 1998). This exceeded the Subpart WWW 50 Mg NMOC threshold. A Tier 2 NMOC emission rate calculation was not submitted in the Title V application. If the Tier 2 NMOC emission rate is not below the 50 Mg threshold, the Tier 3 NMOC emission rate will have to be calculated or a landfill gas collection and control system installed.

Once the facility is required by the NSPS to install a collection system, then the facility must submit a new Title V application. At this point, a Title V will be issued with conditions that ensure the collection system can meet the requirements of the NSPS and that it is operating optimally.

The facility's leachate storage tanks (vessels) are possibly subject to 40 CFR Part 60, Subpart Kb for Volatile Organic Liquid Storage Vessels. The tanks are not subject to the entire rule due to the low vapor pressure of leachate; however, if the tanks are greater than 40 m³ and were constructed, reconstructed, or modified after July 23, 1984 they are subject to 60.116b (a) and (b). 60.116b (a) and (b) require the Permittee to keep readily accessible records showing the dimensions and an analysis showing the capacity of each tank. The Permit contains the above mentioned record keeping requirements associated with Subpart Kb.

Because the City of Thomasville Landfill accepts asbestos-containing waste for disposal, the facility subject to 40 CFR Part 61, Subpart M, NESHAP. As long as the City of Thomasville Landfill remains active it is required to comply with the provisions of 40 CFR 61.154 - "Standard for Active Waste Disposal Sites" including all reporting and record keeping requirements. Upon closure, the facility will be required to comply with 40 CFR 61.151 - "Standards for Inactive Waste Disposal Sites for Asbestos Mills and Manufacturing and Fabricating Operations".

The facility is also subject to 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction. Administrative authority has not been delegated to the Georgia EPD.

Also, the facility is subject to the following Georgia Air Quality Rules:

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

Georgia Rule 391-3-1-.02(2)(n) Fugitive Emissions

Georgia Rule 391-3-1-.02(3) Sampling

Georgia Rule 391-3-1-.02(5) Open Burning

Georgia Rule 391-3-1-.02(6) Source Monitoring

Georgia Rule 391-3-1-.02(8) New Source Performance Standards

Georgia Rule 391-3-1-.02(9) Emission Standards for Hazardous Air Pollutants

- Emission and Operating Standards -

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

The facility shall not allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.

Georgia Rule 391-3-1-.02(2)(n) Fugitive Emissions

This rule requires the facility to minimize fugitive dust from the facility. This includes using water or chemicals for controlling dust on construction operations, grading of roads, and the clearing of land; covering at all times, when in motion, open bodied trucks transporting material likely to give rise to airborne dust; application of suitable material to dirt roads, materials, stockpiles, and other similar surfaces.

Georgia Rule 391-3-1-.02(3) Sampling

Any sampling, computation, and analysis to determine the compliance of any of the emission limits or standards must be in accordance to the Georgia-DNR, Procedures for Testing and Monitoring Sources of Air Pollutants, or by method or procedure approved by the Director. The facility must provide safe and adequate sampling ports, and the facility must operate at maximum capacity during test periods.

Georgia Rule 391-3-1-.02(5) Open Burning

This regulation sets the requirements for open burning of vegetative matter that is generated from the site, and defines the rules necessary for any ground clearing operations. This operation must still be conducted in accordance with any local regulations.

Georgia Rule 391-3-1-.02(6) Source Monitoring

The facility must meet monitoring and related requirements specified in the applicable standard, unless the Director specifies additional or more stringent requirements, in which case all requirements must be met. Also, this section gives EPD the authority to require a company to install, maintain, and use emission monitoring devices to sample emissions.

Georgia Rule 391-3-1-.02(8) New Source Performance Standards

The facility is subject to the following NSPS that the State of Georgia adopted, by reference: 40 CFR, Part 60, Subpart WWW-Municipal Solid Waste Landfills.

Georgia Rule 391-3-1-.02(9) Emission Standards for Hazardous Air Pollutants

The facility is subject to the following NESHAP that the State of Georgia, by reference: 40 CFR, Part 61, Subpart M-Emission Standard for Asbestos (inc. work practices).

C. Compliance Status

The facility did not submit any Section 11.10 forms. This indicates that the source is in compliance with all Air Quality Rules as of the application date.

D. Operational Flexibility

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

E. Permit Conditions

All of the permit conditions for the facility will be facility wide conditions.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility accepts municipal solid waste from the local area and deposits it into the ground. This waste is then covered with a medium to reduce the chance of any particulates becoming airborne. Once the waste is covered, the material starts a natural process of decomposing. The emissions generated from the decomposing process are regulated by Subpart WWW.

B. Equipment List for the Process

The facility has a landfill that is represented with Emission Unit ID Number 0001. The facility also has two leachate storage tanks represented with Emission Unit ID Numbers 0002 and 0003.

C. Equipment & Rule Applicability

- Emission and Operating Caps - The facility is not subject to any emission or operating caps.

- Applicable Rules and Regulations -

Rules and Regulations Assessment: Since the City of Thomasville Landfill is above the 3.2 Mmyrd³ Subpart WWW capacity threshold, it is subject to the NSPS Subpart WWW. This regulation requires that the facility report any modifications to the size of the landfill, an annual emissions estimate must be calculated, and once the emission estimate exceeds 50 Mg of NMOC, then a control and collection system must be put in place.

Emission and Operating Standards: The facility is subject to the Asbestos NESHAP because they can accept this type of waste at the landfill. The Asbestos NESHAP is a work practice standard that contains reporting and record keeping requirements. The NESHAP also denotes how areas that accept asbestos must not emit visible emissions or must be covered by the end of the day, and what kind of signage and barriers must be placed around the area.

The facility is also subject to NSPS Subpart Kb for storage vessels containing volatile organic liquids (VOL). The two tanks are exempt from all parts of this rule except 60.116b(a) and (b) which require record keeping of the dimensions and capacity of the storage vessel.

D. Compliance Status

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

E. Operational Flexibility

Not Applicable

F. Permit Conditions

The permit conditions that were incorporated in Section 3 of the Title V application have been developed out of the requirements of the NSPS and the NESHAP. There is not an existing permit to incorporate into this section.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

This permit specifies that a performance test may be required to determine compliance with the emission limits in Part 3.0, and the test methods to be used to determine compliance are listed. A general condition to require notification of any test and for the submission of a test plan is included.

B. Specific Testing Requirements

The City of Thomasville Landfill is subject to 40 CFR 60 Subpart WWW. Subpart WWW requires that uncontrolled landfills submit annual Nonmethane Organic Compounds (NMOC) emission rate estimate reports. The landfill is not required to submit the annual emission rate estimate if the landfill is controlled and the control system is operating properly. Conditions 4.2.1 through 4.2.4 of this permit contain the procedures for calculating the NMOC emission rate. These procedures are identical to the procedures in Subpart WWW.

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

A. General Monitoring Requirements

This permit specifies that any monitoring systems installed should be in continuous operation and that downtime due to maintenance should be minimized.

B. Specific Monitoring Requirements

The City of Thomasville Landfill is uncontrolled and is subject to Subpart WWW. Subpart WWW and this permit do not contain any specific monitoring requirements for an uncontrolled landfill.

C. Record Keeping and Reporting Requirements:

As per Title V requirements, records, including identification of any deviations from applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee. This permit does not require a periodic report of deviations since the landfill is uncontrolled and no monitoring is necessary.

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 related information to deviations from applicable requirements

B. Specific Record Keeping and Reporting Requirements

As stated above, the landfill is uncontrolled and subject to Subpart WWW. Subpart WWW requires that landfills submit an annual NMOC emissions rate estimate. The landfill is not required to submit the annual emission rate estimate if the landfill is controlled and the control system is operating properly. The permit requires that this emission rate estimate be submitted by January 31 of each year unless a collection and control system is installed and operating properly.

If the emission rate estimate submitted to the Division is greater than or equal to 50 megagrams per year, a Collection and Control Plan is required to be submitted within one year. There are two exceptions where the landfill is not required to submit the Collection and Control Plan. (1) If the emission rate was calculated using Tier 1 and the landfill chooses to recalculate the emission rate using Tier 2. (2) If the emission rate was calculated using Tier 2 and the landfill chooses to recalculate the emission rate using Tier 3. If the landfill chooses either of these options and the recalculated emission rate is less than 50 megagrams per year, the landfill will resume submitting annual emission rate estimates. The deadlines for submitting the recalculated emission rates are 180 days for the first exception and one year for the second exception. Regardless of the option used to recalculate the emission rate, if the recalculated emission rate is greater than or equal to 50 megagrams per year, the landfill must submit a Collection and Control Plan within one year of the original emission rate calculation (Tier 1).

The Asbestos NESHAP has several record keeping and recording requirements. These require that the facility maintain waste records from the generators and transporters. The landfill facility must also maintain records containing the quantity and location of all the asbestos placed in the landfill. The landfill is responsible for reporting any discrepancies in quantity of waste received. The City of Thomasville Landfill is responsible for maintaining these records for two years. Once the facility is closed, the records should be submitted to the administrator of the asbestos NESHAP program.

The VOL Storage Vessel NSPS has two record keeping requirements for vessels greater than 40 m³ and constructed, reconstructed, or modified after July 23, 1984. These require the facility to maintain a record containing each vessel's dimensions and an analysis of the vessel's capacity. These records shall be maintained for the life of the vessel.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable

B. Alternative Requirements

Application did not specify any alternative operating scenerios.

C. Insignificant Activities

The City of Thomasville Landfill has included several insignificant sources of air pollutants noted in Section 4.10 of the Title V application. These include "Mobile Sources", "Trade Operations", "Maintenance , Cleaning and Housekeeping", and "Storage Tanks and Equipment". The City of Thomasville Landfill Title V application denoted that the insignificant activities/units at the facility include cleaning and sweeping of streets, one stationary engine which does not exceed 400 horsepower or 2,000 hours per year of operation, and one petroleum liquid storage tank. All of these activities/units appear to be appropriate for the insignificant list.

D. Temporary Sources

Not Applicable

E. Short-Term Activities

Not Applicable

F. Compliance Schedule/Progress Reports

Not Applicable

G. Emissions Trading

Not Applicable

TITLE V APPLICATION REVIEW

H. Acid Rain Requirements

Not Applicable

I. Prevention of Accidental Releases

Not Applicable

J. Stratospheric Ozone Protection Requirements

Not Applicable

K. Pollution Prevention

Not Applicable

L. 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.

TITLE V APPLICATION REVIEW

Closing Block: We have reviewed and recommend issuance of draft Permit No. 4953-275-0066-V-01-0

Program	Review Engineers	Dates	Review Managers	Dates
SSPP/ASU				
SSCP/ASU				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager

Date