

**TITLE V APPLICATION REVIEW**

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Facility Name: LaGrange I85/SR109 Landfill

City: LaGrange

County: Troup

AIRS #: 04-13-285-00081

Application #: TV- 10907

Date Application Received: September 16, 1998

Date Application Deemed

Administratively Complete: December 7, 1998

Date of Draft Permit: December 6, 1999

Permit No: 4953-285-0081-V-01-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
<b>SSPP/ASU</b>	Michael Roy	John Yntema
<b>SSCP/ASU</b>	Stacy Wix	James Eason
<b>ISMP</b>	Brad Belflower	Larry Webber
<b>TOXICS</b>	N/A	N/A

**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 LaGrange 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: LaGrange I85/SR109 Sanitary Landfill (LaGrange Landfill)
2. Parent/Holding: City of LaGrange, Georgia
3. Previous and/or Other Name(s): No previous names identified
4. Facility Location: 2233 Greenville Road  
LaGrange, Georgia 30241
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 not located within 100 km of a 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 Sanitary Landfill)  
Minor - None
2. Description of Product(s): This facility does not have final products.  
LaGrange Landfill processes general waste.

3. Overall Facility Process Description:

LaGrange Landfill 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 landfill process flow diagram can be found in the 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			T
PM <sub>10</sub>	yes			T
SO <sub>2</sub>	no			T
VOC	yes			T
NO <sub>x</sub>	no			T
CO	no			T
TRS	no			T
H <sub>2</sub> S	no			T
Individual HAP	yes			T
Total HAPs	yes			T

3. MACT Standards

LaGrange 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

<b>Program Code</b>	<b>Applicable (Yes/No)</b>
Program Code M - Part 63 NESHAP	no
Program Code V - Title V	yes

**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

! Rules and Regulations Assessment - The facility is currently subject to NSPS, 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills. LaGrange Landfill has a design capacity greater than 2.5 million cubic meters (m<sup>3</sup>), and the landfill was expanded after the Subpart WWW May 30, 1991 effective date. Using Tier 1 the facility calculated their NMOC emission rate to exceed 50 megagrams (Mg) per year. In March of 1999, Tier 2 testing of the landfill gases was conducted to determine the facility’s site-specific NMOC concentration. Using the average concentration determined by Tier 2 testing LaGrange Landfill NMOC emissions did not exceed the 50 Mg per year.

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 permit 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 is subject to 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction. The facility is also subject to 40 CFR Part 61, Subpart M, NESHAP for Asbestos (inc. Work Practices).

Because the facility accepts asbestos-containing waste for disposal the facility subject to 40 CFR Part 61, Subpart M, NESHAP. As long as the facility remains active it is required to comply with the provision 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”.

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 vegetable 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 adopted, 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.

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 particles becoming airborne. Once the waste is covered, the material starts a natural process of decomposing. The emissions generated from this 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 (SLF).

#### 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 LaGrange Landfill is above the 3.2 MMyrd<sup>3</sup> applicability threshold, they are 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 be covered by the end of the day, and what kind of signage must be placed around the area.

#### D. Compliance Status

According to their 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**

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 LaGrange 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.

**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 LaGrange 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 information related 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. Landfills are not required to submit an annual emission rate estimate if 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 which allow the landfill to not 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.

The Asbestos NESHAP has several record keeping and recording requirements. The facility must maintain waste received 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. LaGrange 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.

**VII. Specific Requirements**

A. Operational Flexibility

Not Applicable

B. Alternative Requirements

There are no alternative requirements that need to be incorporated into the Title V Permit.

C. Insignificant Activities

Not Applicable

D. Temporary Sources

Not Applicable

E. Short-Term Activities

The applicant did not include short-term activities in their Title V Applications.

F. Compliance Schedule/Progress Reports

Not Applicable

G. Emissions Trading

Not Applicable

H. Acid Rain Requirements

Not Applicable

I. Prevention of Accidental Releases

Not Applicable

J. Stratospheric Ozone Protection Requirements

LaGrange Landfill has air conditioners or refrigeration equipment that uses CBC'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.

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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.

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**Closing Block:** We have reviewed and recommend issuance of draft Permit No. 4953-285-0081-V-01-0

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

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**Stationary Source Permitting Program Manager**

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Date