

Facility Name: **LaGrange I85/SR109 Sanitary Landfill**  
 City: LaGrange  
 County: Troup  
 AIRS #: 04-13-285-00081

Application #: TV-15828  
 Date Application Received: November 15, 2004  
 Permit No: 4953-285-0081-V-02-0

| <b>Program</b> | <b>Review Engineers</b> | <b>Review Managers</b> |
|----------------|-------------------------|------------------------|
| <b>SSPP</b>    | Tracey Hiltunen         | John Yntema            |
| <b>ISMP</b>    | Bradley Belflower       | Ross Winne             |
| <b>SSCP</b>    | N/A                     | Karen Hays             |
| <b>Toxics</b>  | N/A                     | Karen Hays             |

## 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 **LaGrange I85/SR109 Sanitary 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: LaGrange I85/SR109 Sanitary Landfill (LaGrange Landfill)

2. Parent/Holding Company Name

City of LaGrange, Georgia

3. Previous and/or Other Name(s)

No previous names identified

4. Facility Location

2233 Greenville Road  
LaGrange, GA 30241

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

Area is designated as an attainment area for all criteria pollutants.

6. Class I Area Impacts

This facility is not located within 200 km of a Class I area.

**B. 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     |
|--|--------------------------------|-------------------------|
| 4953-285-00081-V-01-0                  | April 17, 2000                 | Initial Title V permit. |
|  |                                |                         |
|  |                                |                         |

## 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)

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. The facility has voluntarily installed a gas collection and control system (GCCS) with an open flare for a gas to energy project. This system will not be regulated or included in the Title V permit until required by the New Source Performance Standards (NSPS).

## 4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit 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 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               | yes                       |  |                                   | ✓                       |
| PM <sub>10</sub> | yes                       |  |                                   | ✓                       |

| 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 <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

The landfill is subject to 40 CFR Part 61 Subpart M "Asbestos" because the landfill may dispose of asbestos-containing materials.

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 are less than 50 megagrams per year.

### 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. 4953-285-0081-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to that narrative.

The facility is currently subject to NSPS, 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills. To comply with Subpart WWW, the facility must submit an annual emission rate report and redetermine the site-specific NMOC concentration of the landfill gas every 5 years. The facility completed retesting for the site-specific NMOC emission rate on January 8, 2004. The NMOC emission rate was 14.3 Mg per year, which is less than the 50 Mg per year threshold. If the facility continues to calculate annual emission rates per Tier 2, the next deadline for retesting the site-specific NMOC emission rate will be January 8, 2009.

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

This rule applies to each landfill that received waste after 11/6/87 that is a major source, is co-located with a major source, or is subject to the control requirements of 40 CFR 60 Subpart WWW. This landfill is currently not subject to this rule because the landfill is not currently required by 40 CFR 60 Subpart WWW to install and operate a landfill gas collection and control system (GCCS). When the control requirements of Subpart WWW become applicable, the landfill will become subject to Subpart AAAA. The facility must comply with the requirements of this NESHAP by the date on which the landfill is required to install a GCCS. If it begins adding liquids, other than leachate, in a controlled fashion to the waste mass, that would trigger the Subpart AAAA provisions for a bioreactor. If the facility becomes subject to Subpart AAAA, it will be also be subject to Subpart A, the NESHAP General Provisions.

#### C. Compliance Status

The facility did not indicate any noncompliance.

#### D. Operational Flexibility

None applicable.

#### E. Permit Conditions

Permit Conditions from the initial Title V permit have been incorporated into Permit No. 4953-285-0081-V-02-0 with the following changes.

Section 2.2 has been modified as follows:

Condition 2.2.1 establishes 40 CFR Part 60 Subpart A as applicable to the landfill.

Condition 2.2.2 establishes 40 CFR Part 60 Subpart WWW as applicable to the landfill.

Condition 2.2.3 establishes 40 CFR Part 61 Subpart A as applicable to the landfill.

Condition 2.2.4 establishes 40 CFR Part 61 Subpart M as applicable to the landfill.

Condition 2.2.5 establishes 40 CFR Part 63 Subpart A as potentially applicable to the landfill. The facility must comply with the requirements of this NESHAP by the date on which the landfill is required to install a GCCS.

Condition 2.2.6 establishes 40 CFR Part 63 Subpart AAAA as potentially applicable to the landfill. The facility must comply with the requirements of this NESHAP by the date on which the landfill is required to install a GCCS.

Condition 2.3.1, Georgia Rule 391-3-1-.02(2)(a)1, a standard template condition for operational practices has been moved and renumbered as Condition 8.17.2.

### III. Regulated Equipment Requirements

#### A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 4953-285-0081-V-01-0. Please refer to that 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 |
| SLF            | Landfill    | 40 CFR 60 Subpart A<br>40 CFR 60 Subpart WWW<br>40 CFR 61 Subpart A<br>40 CFR 61 Subpart M<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart AAAA<br>391-3-1-.02(2)(n) | 2.2.1 through 2.2.6,<br>3.3.1, 3.4.1, 3.4.2,<br>4.2.1 through 4.2.5,<br>6.2.1 through 6.2.14 | n/a                           | n/a         |

\* 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 Permit No. 4953-285-0081-V-01-0 is discussed in the initial Title V permit narrative for that permit. Please refer to that narrative.

Emission and Operating Caps: None Applicable

Rules and Regulations Assessment:

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

The landfill is subject to Georgia Rule (n) "Fugitive Emissions." This rule requires that the facility minimize fugitive dust from the facility. For landfills 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 dust suppressing material to dirt roads, material, stockpiles, and other similar sources.

#### D. Compliance Status

The facility did not indicate any noncompliance.

#### E. Operational Flexibility

None applicable.

**F. Permit Conditions**

Permit Conditions from the initial Title V permit have been incorporated into Permit No. 4953-285-0081-V-02-0 with the following changes.

Condition 3.1, the Emission Units table, has been updated to include 40 CFR 60 Subpart A, 40 CFR 61 Subpart A, 40 CFR 63 Subpart A, 40 CFR 63 Subpart AAAA and the corresponding permit conditions.

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

Conditions 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 3.4.2 also establishes the Georgia Rule (n) 20% opacity limit for fugitive dust.

**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**

Testing requirements specified in Permit No. 4953-285-0081-V-01-0 are discussed in the initial Title V permit narrative for that permit.

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

None applicable.

**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****1. Individual Equipment:**

None applicable.

**2. Equipment Groups (all subject to the same monitoring requirements):**

None applicable.

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

Not Applicable

## 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 Permit No. 4953-285-0081-V-01-0 are discussed in the initial Title V permit narrative for that permit. Please refer to that narrative.

Conditions 6.1.1 through 6.1.3, that specify the general record keeping and reporting requirements, have been carried over from the initial Title V Permit.

Conditions 6.1.4, 6.1.5, and 6.1.6, containing record keeping requirements, are Conditions 5.3.1, 5.3.2, and 5.3.3 from the initial Title V Permit. They have been moved to Section 6 and renumbered.

New Condition 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 6.2.11.

Old Conditions 6.2.2 and 6.2.3, concerning the NMOC emission reports and submission requirements for a GCCS plan, have been combined in New Condition 6.1.1.

Old Condition 6.2.1, requiring the submission of an amended design capacity report for any increase in capacity, has been renumbered as Condition 6.2.10.

New Condition 6.2.2 requires the Permittee, if beginning to calculate NMOCs according to Tier 3, to submit a revised Tier 3 NMOC emission rate report within one year of the first calculated emission rate exceeding 50 megagrams per year. However, if the resulting Tier 3 NMOC emission rate is equal to or greater than 50 megagrams per year, the Permittee must comply with Condition 6.2.1(b), as per New Condition 6.2.3.

Conditions 6.2.4, 6.2.8, and 6.2.9 have been carried over from the initial Title V permit. These conditions require facilities that have received asbestos-containing waste to comply with the requirements of 40 CFR 61 Subpart M.

Conditions 6.2.5 and 6.2.6 have been carried over from the initial Title V Permit. Per Condition 6.2.5, the facility is exempt from submitting annual NMOC emission rate reports upon installation of a gas collection and control system (GCCS) that complies with 40 CFR 60 Subpart

WWW. Condition 6.2.6 requires the Permittee to submit a Landfill Closure Report after it stops accepting waste.

Condition 6.2.7 has been carried over from the initial Title V permit. This condition requires the facility to keep records of design capacity, amount of waste in place, and yearly waste acceptance rates.

Condition 6.2.11, requiring the Permittee to develop and implement a Dust Suppression Plan to assure compliance with Georgia Air Quality Rule (n) for fugitive dust, is Old Condition 5.3.3. Failure to follow the procedures of the Dust Suppression Plan must be reported, as an excursion, as required by Condition 6.1.7.

New 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 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.

New 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.

New Condition 6.2.14 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.

**VII. Specific Requirements**

## A. Operational Flexibility

- Not applicable

## B. Alternative Requirements

- Not applicable

## C. Insignificant Activities

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

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

## D. Temporary Sources

- Not applicable

## E. Short-Term Activities

The following has been included in the permit.

When the following activities occur, the Permittee is required to maintain records relating to these activities:

- a) Construction of Landfill Cell
- b) Capping (Closure) of Landfill Cell

## F. Compliance Schedule/Progress Reports

The facility received a consent order for failure to submit a Part 70 permit renewal application in a timely manner.

## G. Emissions Trading

- Not applicable

## H. Acid Rain Requirements

- Not applicable

## I. Stratospheric Ozone Protection Requirements

LaGrange 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.

## J. Pollution Prevention

- Not applicable

## K. 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.

Addendum to Narrative

The 30-day public comment period started on November 29, 2005 and ended on December 29, 2005. No comments were received from the public, company, and EPA.