

Facility Name: **Old Dixie Municipal Solid Waste Landfill**
 City: Dalton
 County: Whitfield
 AIRS #: 04-13-313-00131

Application #: TV-15610
 Date Application Received: September 9, 2004
 Permit No: 4953-313-0131-V-02-0

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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 **Old Dixie 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, 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: Old Dixie Municipal Solid Waste Landfill
2. Parent/Holding Company Name:
Dalton-Whitfield Regional Solid Waste Management Authority
3. Previous and/or Other Name(s): No previous names identified
4. Facility Location:
4189 Old Dixie Highway
Dalton, GA 30721
5. Attainment, Non-attainment Area Location, or Contributing Area:
The facility is located in an attainment area for all criteria pollutants.
6. Class I Area Impacts:
The facility is located within 200 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 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
4953-313-0131-V-01-0	March 10, 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 a final product. Old Dixie Municipal Solid Waste Landfill processes general waste.

3. Overall Facility Process Description

Old Dixie MSW Landfill receives municipal and industrial solid waste. The solid waste is deposited directly into the landfill and covered with fill dirt. In the future, the facility plans to install a gas collection and control system (GCCS) with a flare. 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/NSR regulations.

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			✓

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

3. MACT Standards

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 m³ and that has estimated uncontrolled Non-Methane Organic Compounds (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. The landfill is also subject to 40 CFR Part 61 Subpart M "Asbestos" because the landfill has disposed of asbestos-containing materials.

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. 4953-313-0131-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to that narrative.

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. The facility will also have to comply if it begins adding liquids, other than leachate, in a controlled fashion to the waste mass, triggering the provisions for bioreactors.

C. Compliance Status

The Title V renewal application submitted by this facility contains a compliance certification, which was signed by the company's responsible official, certifying that “that this facility is in compliance with all applicable requirements effective as of the date of this certification and will continue to comply with such requirements.” The Title V permit application contained no indication of any non-compliance known by the company.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Permit Conditions from the initial Title V permit have been incorporated into Permit No. 4953-313-0131-V-02-0 with the following changes.

Section 2.2 has been modified to add Conditions 2.2.1 – 2.2.6

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 or begins adding liquids such that the landfill becomes a bioreactor.

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 or begins adding liquids, operating as a bioreactor.

Federal Rule 40 CFR Part 60 Subpart Kb – “NSPS for Volatile Organic Liquid Storage Vessels” has been removed from the permit because this rule has been amended. As per the amended rule, this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with maximum true vapor pressure less than 15.0 kPa. The leachate vapor pressure is normally less than the threshold of 3.5 kPa (equivalent to 0.5076 psi); therefore, NSPS 40 CFR 60 Subpart Kb is no longer applicable.

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. 4953-313-0131-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
EU01	Landfill	40 CFR 60 Subpart A 40 CFR 60 Subpart WWW 40 CFR 61 Subpart A 40 CFR 61 Subpart M 40 CFR 63 Subpart A 40 CFR 63 Subpart AAAA 391-3-1-.02(2)(n)	2.2.1 through 2.2.6, 3.3.1, 3.4.1, 3.4.2, 4.2.1 through 4.2.4, 6.2.1 through 6.2.12	N/A	N/A

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

Note that the leachate storage tanks have been removed from the equipment list. These tanks are no longer subject to 40 CFR Part 60 Subpart Kb.

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 4953-313-0131-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; as well as application of suitable dust suppressing material to dirt roads, material, stockpiles, and other similar sources.

D. Compliance Status

See Section II.C. above.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Permit Conditions from the initial Title V permit have been incorporated into Permit No. 4953-313-0131-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 AAAAA, and the corresponding permit conditions. The leachate storage tanks have been removed from the equipment list. These tanks are no longer subject to 40 CFR Part 60 Subpart Kb.

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

Conditions 3.4.1 and 3.4.2 re-state the Georgia 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 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. 4953-313-0131-V-01-0 are discussed in the initial Title V permit narrative for that permit. Please refer to that narrative.

Conditions 4.2.1 – 4.2.4 have been carried over from the initial Title V permit (Permit No. 4953-313-0131-V-01-0).

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

No applicable requirements.

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

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. 4953-313-0131-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.

New Condition 6.1.4 requires semiannual reports of excess emissions, exceedances, and excursions. This is a standard template condition.

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

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 6.2.9.

Condition 6.2.1 concerning the NMOC emission reports has been carried over from the initial Title V Permit.

Old Condition 6.2.2, requiring the submission of a GCCS plan within one year of the NMOC emission rate exceeding 50 megagrams per year, has been incorporated into Condition 6.2.1(b) in the Title V Renewal.

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.

Old Condition 6.2.3, authorizing the facility to exclude any areas of deposited asbestos or other nondegradable waste from being part of a required 40 CFR 60 Subpart WWW GCCS, has been renumbered as Condition 6.2.6 in the Title V Renewal.

Old Conditions 6.2.4, 6.2.5, 6.2.7, and 6.2.8 have been carried over from the initial Title V Permit.

Old Condition 6.2.6 has been deleted. This condition required record keeping for the leachate storage vessels per 40 CFR 60 Subpart Kb. Subpart Kb is no longer applicable.

Condition 6.2.9, 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 6.2.10 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 6.2.11 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 6.2.12 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

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

This has been included in the permit.

F. Compliance Schedule/Progress Reports

- There are no non-compliance issues at the facility based on the Title V renewal application and the permit review process.

G. Emissions Trading

- Not applicable

H. Acid Rain Requirements

- Not applicable

I. Stratospheric Ozone Protection Requirements

- Not applicable

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 September 21, 2005 and ended on October 21, 2005. No comments were received from the public or EPA.

The Division received written comments, dated October 21, 2005, from the Dalton-Whitfield Regional Solid Waste Management Authority.

1. The Comments requested that EPD delete Condition 3.4.1., since “391-3-1-.02(n) is already referenced under Permit Condition 3.1 and the wording is duplicated in Permit Condition 8.22. Listing the conditions of the regulation twice is redundant.”

Response: The table in Section 3.1 is designed to merely list the applicable requirements of each piece of equipment listed, which includes Rule(n) for the landfill. However, it is EPD’s policy, and part of our agreement with US EPA, that each Title V permit not only reference each applicable requirement but also spell out requirements in the permit.

With regard to our including Rule(n) twice in your permit: Condition 8.22 is part of Section 8 of the permit. Section 8 contains generally applicable requirements, as well as requirements of Air Quality Rules that would be applicable if exempt equipment is at the facility or could be installed without obtaining a permit. For example, if a facility installed a natural gas fired boiler with heat input capacity less than 10 MMBtu/hour, a permit would not be required; however, the facility would still be subject to Rule 391-3-1-.02(2)(d). Likewise, certain incinerators, with less than 8 MMBtu input heat capacity, are exempt from permitting but are subject to Rule 391-3-1-.02(2)(c). For that reason, a number of rules, including Rule(c), Rule(d) and Rule(n) are included in Section 8, the “General Provisions”.

The General Provisions are different than conditions in the rest of the Title V permit, because the entire section is included identically in every permit. That is part of our agreement with US EPA. [One caveat: Requirements have been added to Section 8 over the years. Whenever that is done, EPD has an agreement with EPA that we inform them of the change. This means that EPA does not need to review Section 8 of any particular Title V permit, because they know that each condition has already been pre-approved.]

Therefore, it is the Division’s policy that if an emissions unit is included in the table in Section 3.1, all relevant requirements will be included in Sections 2 through 6 of the permit, even if it duplicates requirements in the “General Provisions.” Because there is a great deal of opportunity for fugitive dust to be generated in operating a landfill, it is our policy to include Rule(n) in Section 3 of landfill Title V permits.

2. The comments contain a complaint that a landfill is not a piece of equipment, and especially not “Process Equipment” as defined in our Rules.

Response: The Division does not mean to imply that the landfill is a piece of equipment (although it contains equipment and can contain process equipment). Please note that Section 3 of the permit is entitled “Requirements for Emission Units.” We consider a landfill to be an emission unit, so it is included in Table 3.1, which is entitled “Emission Units”. While the subsections of Section 3 contain the word “Equipment,” what this really means is “Emission Units,” to distinguish Section 3 from Section 2, which contains requirements for the entire site.

It is arguable that the landfill is the entire site and that landfill requirements should be found in Section 2. However, we have generally not done so, because there are some pieces of equipment at some landfills that are not part of the landfill, such as leachate tanks, wood grinders, and landfill gas fired internal combustion engines powering generators.

3. The comments request that EPD delete Condition 8.25.1, “since regulation 391-3-1-.02(vv)(1) applies to specific non attainment counties...It is also very unlikely that Whitfield County will ever become non attainment...”

Response: As mentioned above, Section 8 contains a number of conditions that cover units that can be installed without an air quality permit; the conditions are to make clear to the Permittee that such units are subject to the rules even if permitting is not required. EPD agrees that a facility in Whitfield County could never inadvertently become subject to Rule(vv), because Rule(vv) cannot be applicable in that county. However, this condition is part of Section 8, which is the same in all permits.

4. The comments suggest that EPD should not list the insignificant activity of “Cleaning and sweeping of streets and paved surfaces” as a Mobile Source. The emissions from this activity would be coming off the roadway surfaces. Roadway surfaces are not mobile sources.

Response: The Division agrees that “Cleaning and sweeping of streets and paved surfaces” should not be classified as a Mobile Source on the standard Insignificant Activities Checklist. It has been moved to the Maintenance, Cleaning, and Housekeeping category. The permit has been changed to reflect this change.

The Insignificant Activities Checklist has been modified. It was:

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	1

It is now:

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	4
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	
	8. Cleaning and sweeping of streets and paved surfaces	1