

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Mark Williams, Commissioner

F. Allen Barnes, Director

August 26, 2011

Tim Bassett, Manager
Waste Management, Inc.
3001 South Pioneer Drive
Smyrna, GA 30083

Re: Application No. 20161, dated January 7, 2011, with revisions dated May 19, 2011 and July 25, 2011
Chambers R&B Landfill, AIRS No: 011-00014
Application for a Landfill Gas-To-Energy Facility

Dear Mr. Bassett:

In their letter to the Georgia Environmental Protection Division (EPD) dated July 25, 2011, Waste Management, Inc. (WM) proposed the following BACT limits:

Pollutant	Proposed BACT Emission Limit (Modeling Emission Rate)	Anticipated Averaging Period
CO	4.13 g/bhp-hr (24.84 lb/hr)	3-hour average
NOx	0.6 g/bhp-hr (3.7 lb/hr NOx)	3-hour average
PM, PM ₁₀ , PM _{2.5} (Filterable plus condensable particulate matter)	0.135 g/bhp-hr (0.848 lb/hr)	3-hour average
VOC (includes formaldehyde)	0.52 g/bhp-hr (3.21 lb/hr)	3-hour average
SO ₂ This limit is for PSD Avoidance Purposes	1.52 lb/hr	N/A

The Georgia EPD has reviewed the revised applications dated May 19, 2011 and July 25, 2011 and the RACT/BACT/LAER Clearinghouse (RBLC) to determine BACT limits and emission rates for modeling purposes. The results of this review are summarized below:

Item 1: BACT Limits for PM, PM₁₀, PM_{2.5}, NOx, and VOC

Georgia EPD agrees with Waste Management's proposed BACT limits (and corresponding modeling emission rate as listed in the above table), with the exception of carbon monoxide (CO).

Item 2: NO_x

Modeled NO₂ should use default ambient NO₂/NO_x ratios for the appropriate averaging period unless a lower ratio is approved by the Division. Default is 80% for 1-hour and 75% for Annual.

Item 3: CO

Georgia EPD proposed a CO BACT limit of 2.75 g/bhp-hr based on a review of recent permits issued for equivalent equipment. WM objected to this BACT limit, saying it is not achievable on a long-term basis. They note that the vendor guarantees 2.75 g/bhp-hr for only the first 100 hours of operation. WM proposed a CO BACT limit of 4.13 g/bhp-hr based on the Caterpillar vendor "Not-To-Exceed" CO data.

Georgia EPD conducted a survey of applicable permit limits to determine if CO BACT limits were being raised to some level above the permitted rate of 2.75 g/bhp-hr. Georgia EPD learned that one permitting agency was giving strong consideration to raising a permitted rate from 2.75 g/bhp-hr to 3.5 g/bhp-hr. Georgia EPD could not locate a permit in which the CO BACT limit was set as high as 4.13 g/bhp-hr.

Georgia EPD has determined that CO BACT should be no higher than 3.5 g/bhp-hr per engine (equivalent to a model emission rate of 21.71 lb/hr).

With the issue of BACT limits now settled with this letter, the lack of modeling remains as the hindrance to a permit application review. **Please submit the required Class I and Class II air impact analyses by September 30, 2011. Failure to provide the required and complete air impact analyses by September 30 may result in Georgia EPD returning the application due to incompleteness.**

If you have any questions or need more information, please contact me at (404) 363-7020 or via email at eric.cornwell@dnr.state.ga.us.

Sincerely,



Eric Cornwell
Manager
Stationary Source Permitting Program

- c: Peter Courtney, Georgia EPD Planning & Support Program
- Susan Jenkins, Georgia EPD Stationary Source Permitting Program
- John Yntema, Georgia EPD Stationary Source Permitting Program
- Tracey Hiltunen, Georgia EPD Stationary Source Permitting Program
- William Apple, SAGE Environmental Consulting