



WELCOME!

GA EPD Air Branch Stakeholder Meeting on Rule Revisions for Existing Municipal Solid Waste Landfills

The stakeholder meeting will start in a few minutes....

- Check and update your user name
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Municipal Solid Waste Landfill Update Stakeholder Meeting Agenda

Topic	Speaker	Time
Welcome Note	Karen Hays	2:00 PM – 2:05 PM
Process and Rule Update Overview	Taruna Vanjani	2:05 PM – 2:15 PM
Rule Changes Presentation	Kenneth Phillips	2:15 PM – 2:30 PM
Q&A Session related to Rule Changes Presentation	Kenneth Phillips	2:30 PM – 2:45 PM
Next Steps Presentation	Taruna Vanjani	2:45 PM – 2:50 PM
General Q&A Session	All	2:50 PM – 3:00 PM
Adjourn	Karen Hays	3:00 PM – 3:05 PM

We will begin shortly...



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

EPD Air Protection Branch

Existing MSW Rule Update Overview

Taruna Vanjani
Environmental Engineer,
Planning & Regulatory Development Unit

**Existing MSW Rule Revision
Stakeholder Meeting
September 8, 2020**



WELCOME!

GA EPD Air Branch Stakeholder Meeting on Rule Revisions for Existing Municipal Solid Waste Landfills {GA Rule 391-3-1-.02(ggg)}

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Original MSW Landfill Rules

In 1996, EPA issued two new municipal solid waste (MSW) regulations:

- NSPS Subpart WWW – New Sources
- Subpart Cc – Existing Sources
- Georgia Rule 391-3-1-.02(2)(ggg)

Georgia's previous state plan was approved by EPA on November 13, 1998.



New MSW Landfill Regulations

Two new municipal solid waste (MSW) regulations – August 29, 2016

- NSPS Subpart XXX – New Sources
- Subpart Cf – Existing Sources

Subpart Ba requirements adopted into the emission guidelines – August 26, 2019

Finding of Failure to Submit State Plan – March 9, 2020

- Revise Rule 391-3-1-.02(2)(ggg)
- Submit a new state plan for Existing Municipal Solid Waste Landfills



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Rules Affecting Landfills in Georgia

An update to Rule (ggg) and changes to the Federal regulations

Kenneth Phillips
Environmental Engineer
Air Toxics Unit

**Existing MSW Rule Revision
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Requirements of Georgia Rule 391-3-1-.02(2)(ggg)

Georgia Rule 391-3-1-.02(2)(ggg)

- Georgia Rule 391-3-1-.02(2)(ggg) [Rule(ggg)] establishes the requirements for existing landfills, all landfills constructed or modified prior to May 30, 1991, as required by Emissions Guideline Cc
- The performance standards in Rule(ggg) reference the standards provided in the Federal New Source Performance Standards for Municipal Solid Waste Landfills, 40 CFR Part 60, subpart WWW.



Requirements of Georgia Rule 391-3-1-.02(2)(ggg)

Revision of Georgia Rule 391-3-1-.02(2)(ggg)

- The revision to Rule(ggg) will expand the classification of existing landfills to all landfills constructed or modified before July 18, 2014. The standards in Rule(ggg) will now reference the new standards provided in the Emission Guideline Cf.



The Journey to Revise Georgia Rule 391-3-1-.02(2)(ggg)

EPA Finalizes New Landfill Rules

- On August 29, 2016, the EPA promulgated the new Emission Guideline Cf (EG Cf).
- Under EG Cf, States were initially required to submit State Plans to EPA by May 29, 2017.



The Journey to Revise Georgia Rule 391-3-1-.02(2)(ggg)

EPA Revises the Submittal Process

- There was a great deal of complexity surrounding the submittal of a state plan with the interactions of other regulations proposed by EPA.
- The EPA was then considering a revision to the timelines of state plan submittals from 9 months to 3 years. This amendment to the regulations was finally proposed on August 31, 2018. When it was finalized, the submittal date of State Plans implementing EG Cf changed to August 29, 2019.



The Journey to Revise Georgia Rule 391-3-1-.02(2)(ggg)

Multiple Federal Standards for Landfills

- There were issues with requirements to meet multiple standards under 40 CFR Part 60 for landfills that were major sources of Hazardous Air Pollutants.
- These HAP major landfills are subject to the standards in 40 CFR Part 63, subpart AAAA (MACT AAAA) which required compliance with the standards in 40 CFR 60, subpart WWW (NSPS WWW). Thus these landfills were subject to two different standards in 40 CFR Part 60.



The Journey to Revise Georgia Rule 391-3-1-.02(2)(ggg)

EPA Moves to Change Federal Standards for Landfills

- The EPA proposed rules to amend MACT AAAA to have performance standards independent of 40 CFR Part 60 on July 29, 2019. This was only one month before the submittal deadline of a State Plan on August 29, 2019.
- These changes were not finalized until March 26, 2020.



Performance Standards for Landfills

The Changes to the Performance Standards for Landfills

- MACT AAAA has been amended to have independent emission standards and requirements rather than referencing NSPS WWW. However, a landfill subject to MACT AAAA may comply with the requirements of NSPS WWW and a SSM Plan until September 27, 2021.
- NSPS WWW has been amended to allow landfills to comply with NSPS WWW until the landfill becomes subject to either an approved and effective state or federal plan that implements EG Cf or NSPS XXX.



Performance Standards for Landfills

The Changes to the Performance Standards for Landfills

- EG Cf has been amended to allow compliance with requirements of MACT AAAA as an alternative to the requirements provided in EG Cf for: Operational Standards, Compliance Provisions, Monitoring, Reporting, and Recordkeeping.
- Existing landfills will now have the requirement to install a Gas Collection and Control System (GCCS) if their annual NMOC emission rate is 34 Mg or more, if active, or 50 Mg or more for closed landfills.



Performance Standards for Landfills

The Changes to the Performance Standards for Landfills

- Existing landfills will no longer be required to meet a performance standard for wellhead oxygen concentration once the State Plan is approved.
- Exceedances of wellhead standards will be addressed by root cause analysis rather than ATLS.



What These Changes Mean for Landfills

Regulatory Applicability for Georgia Landfills

- For landfills in Georgia, there will be eight categories for regulatory purposes.



What These Changes Mean for Landfills

Regulatory Applicability for Small Landfills

- There are four categories for small landfills (landfills with a total capacity, in all adjacent areas where MSW is placed, of < 2.5 million m³ OR < 2.5 million Megagrams mass) :

	HAP Non-major	HAP Major
Small Existing Landfills (Pre-7/18/14)	Rule(ggg) [EG Cf]	Rule(ggg) [EG Cf]* MACT AAAA
Small New Landfills (Post-7/17/14)	NSPS XXX	NSPS XXX* MACT AAAA



What These Changes Mean for Landfills

Regulatory Applicability for Small Landfills

- Small landfills are not large enough to require Part 70 Permits; they are required to comply with initial reporting under either Rule(ggg) or NSPS XXX.
- Small landfills will only be subject to MACT AAAA if they are a major source (≥ 10 tons HAP per year) by emissions or co-located with a major source of HAP.



What These Changes Mean for Landfills

Regulatory Applicability for Large Landfills

- There are four categories for large landfills (landfills with a capacity, in all adjacent areas where MSW is placed, of both 2.5 million m³ volume and 2.5 million Megagrams mass):

	HAP Non-major	HAP Major
Large Existing Landfills (Pre-7/18/14)	Rule(ggg) [EG Cf]*	Rule(ggg) [EG Cf]* MACT AAAA
Large New Landfills (Post-7/17/14)	NSPS XXX*	NSPS XXX* MACT AAAA



What These Changes Mean for Landfills

Regulatory Applicability for Large Landfills

- Large existing landfills are also subject to Rule(ggg). These landfills may be required to install a GCCS based on annual NMOC emissions, and therefrom must meet the performance the standards in Rule(ggg), as provided in EG Cf. Additionally, Rule(ggg) requires the submittal of dates for awarding contracts and beginning construction to ensure the timely installation of a GCCS.
- Large landfills may also be subject to MACT AAAA if they are a major source of HAP, are collocated with a major source of HAP, or have annual NMOC emissions ≥ 50 Mg.



Questions?

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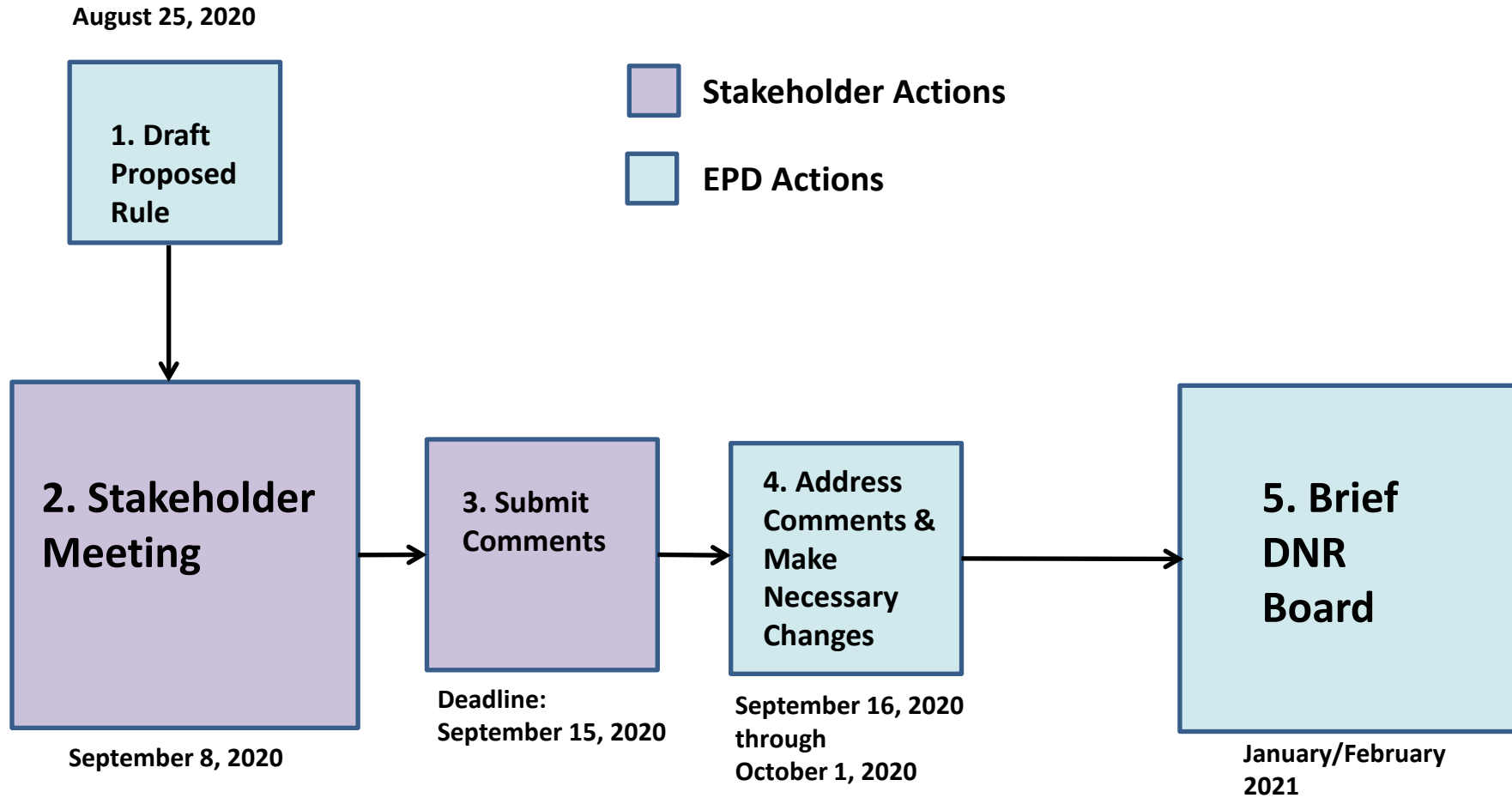
Rulemaking Process Overview

Taruna Vanjani
Environmental Engineer
Planning & Regulatory Development Unit

Existing MSW Rule Revision
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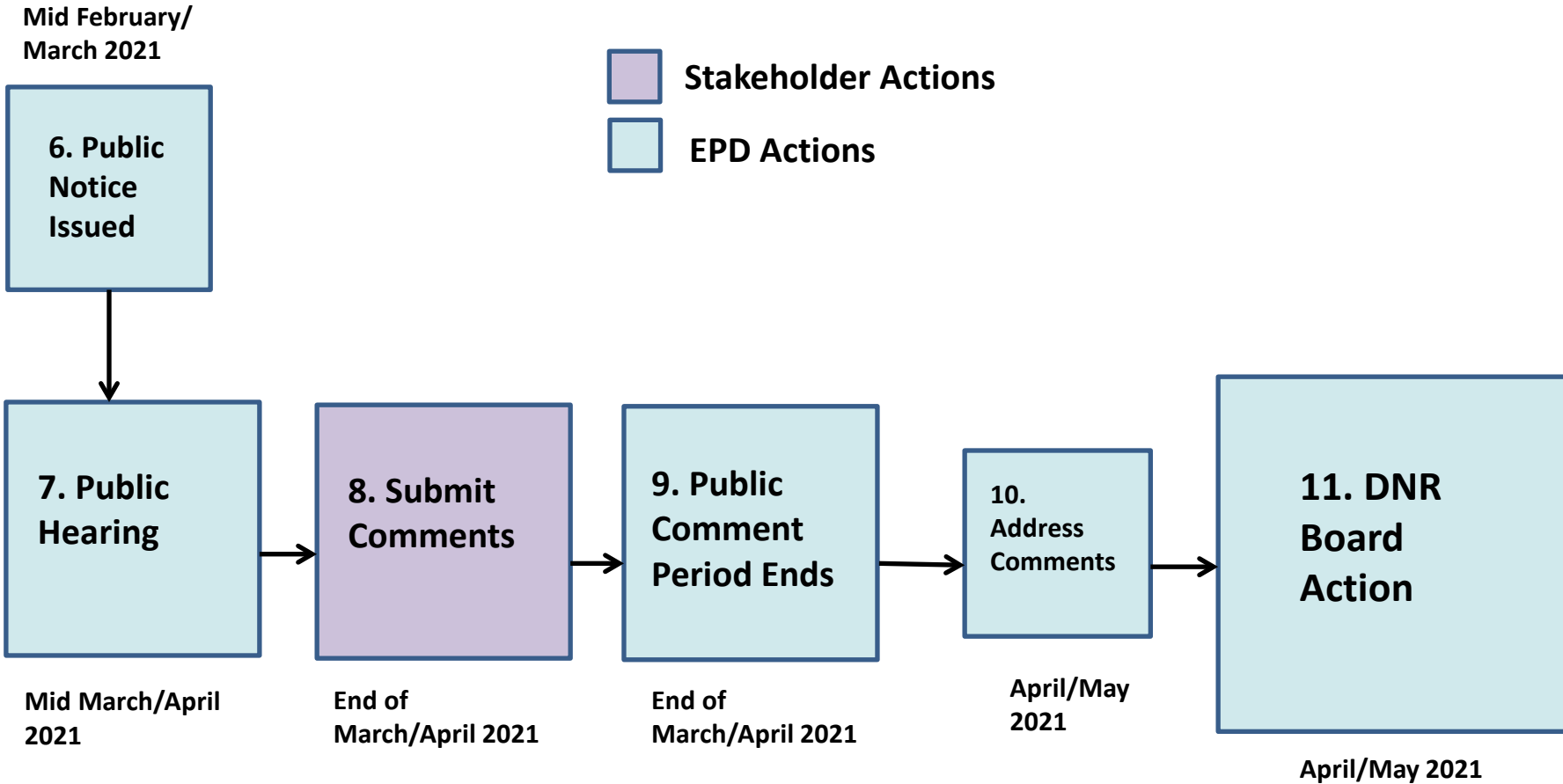


Rulemaking Process: Stakeholder PROCESS



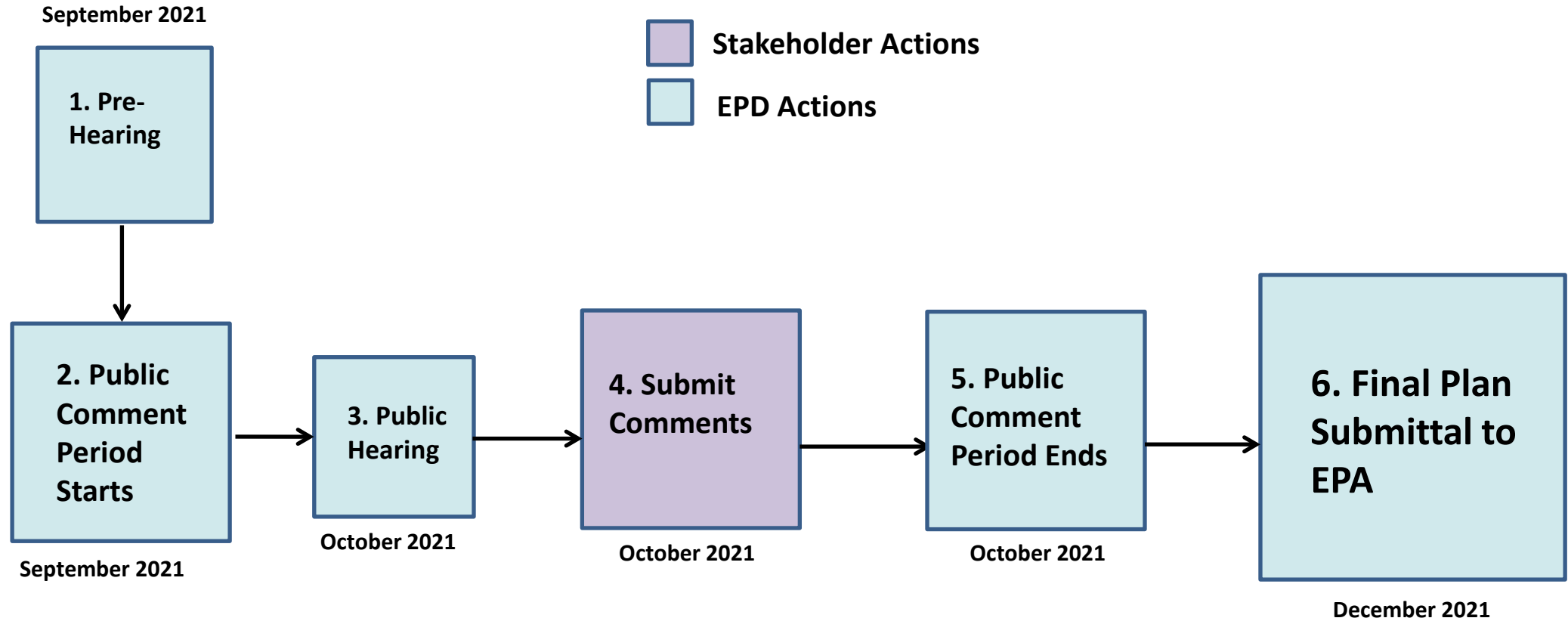


Rulemaking Process: Briefing To ADOPTION





State Plan Submittal Process





Next Steps...

Task/Event	Schedule
Stakeholder Comment Deadline:	September 15, 2020
Address Stakeholder Comments:	September to October 2020
Send Draft Rule to EPA:	October 2020
Address EPA Comments:	November 2020
Begin Formal Rulemaking Process	January/February 2021

Please send comments to:

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Q&A

