

Facility Name: **Eagle Point Landfill**

City: Ball Ground

County: Forsyth

AIRS #: 04-13-117-00059

Application #: TV-29568

Date SIP Application Received: January 24, 2025

Date Title V Application Received: January 24, 2025

Permit No: 4953-117-0059-V-04-2

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. 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 issued pursuant to: (1) Sections 391-3-1-.03(1) and 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 following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. 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 comment period and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
4953-117-0059-V-04-0	March 24, 2020	Title V Renewal
4953-117-0059-V-04-1	August 12, 2020	Operation of a new 3,000 scfm nominal open flare (CD06)

**B. Regulatory Status****1. PSD/NSR/RACT**

On June 18, 2018, Rule 391-3-1.03(8)(c)14 was revised so that the major source threshold for NO<sub>x</sub> and VOC for Title V and NAA-NSR has been raised from 25 tpy to 100 tpy in the 15 counties including Forsyth county. All PSD and nonattainment area new source review (NAA NSR) regulated pollutants are less than the major source threshold, and Eagle Point Landfill and Eagle Point Landfill High Btu Facility is now recognized as a disaggregated separate source in accordance with the April 30, 2018 US EPA precedent involving Meadowbrook Energy LLC (see Appendix D of the application).

## 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	✓			✓
PM <sub>10</sub>	✓			✓
PM <sub>2.5</sub>	✓			✓
SO <sub>2</sub>	✓			✓
VOC	✓			✓
NO <sub>x</sub>	✓			✓
CO	✓			✓
TRS	N/A			
H <sub>2</sub> S	N/A			
Individual HAP	✓			✓
Total HAPs	✓			✓

## II. Proposed Modification

### A. Description of Modification

The facility will expand from its current design capacity of 28.2 million metric tons municipal solid waste to 54.9 million metric tons by expanding the facility's footprint. The proposed expansion is considered a modification under New Source Performance Standards (NSPS) and will cause the facility to become subject to the NSPS Subpart XXX, Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014, upon commencement of construction of the expansion. The facility will simultaneously cease to be subject to the 40 CFR 62, Subpart OOO Federal Plan implementing 40 CFR 60, Subpart Cf.

### B. Emissions Change

**Table 3: Emissions Change Due to Modification**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Facility Wide Potential to Emit</b>
PM	✓		29.65
PM <sub>10</sub>	✓		29.65
PM <sub>2.5</sub>	✓		29.65
SO <sub>2</sub>	✓		13.59
VOC	✓		0.079
NO <sub>x</sub>	✓		66.27
CO	✓		101.16
TRS	N/A		
H <sub>2</sub> S	N/A		
Individual HAP	✓		3.84
Total HAPs	✓		3.84

### C. PSD/NSR Applicability

On June 18, 2018, Rule 391-3-1.03(8)(c)14 was revised so that the major source threshold for NO<sub>x</sub> and VOC for Title V and NAA-NSR has been raised from 25 tpy to 100 tpy in the 15 counties including Forsyth county. All PSD and nonattainment area new source review (NAA NSR) regulated pollutants are less than the major source threshold, and Eagle Point Landfill and Eagle Point Landfill High Btu Facility is now a segregated source under the PSD and NAA NSR regulations in accordance with the April 30, 2018, US EPA precedent involving Meadowbrook Energy LLC (see Appendix D of the application).

### **III. Facility Wide Requirements**

#### **A. Emission and Operating Caps:**

None applicable.

#### **B. Applicable Rules and Regulations**

Expansion of the landfill's design capacity from its current design of 28.2 million metric tons of municipal solid waste to 54.9 million metric tons. Upon commencement of construction of this expansion, applicability of the Federal Plan at 40 CFR 62, Subpart OOO will end, and applicability of 40 CFR 60, Subpart XXX will begin.

#### **C. Compliance Status**

The company did not indicate any noncompliance issues in its application.

#### **D. Permit Conditions**

Condition 2.2.1 was modified to indicate the facility must comply with of the New Source Performance Standards (NSPS), 40 CFR 60 Subpart A – “General Provisions,” and Subpart XXX – “Standards of Performance for Municipal Solid Waste Landfills” upon commencement of construction of the expansion, instead of the previous 40 CFR 60 Subpart A – “General Provisions,” and Subpart WWW – “Standards of Performance for Municipal Solid Waste Landfills.”.

#### **IV. Regulated Equipment Requirements**

##### **A. Brief Process Description**

This application proposes the following updates and modifications:

- Expansion of the landfill's design capacity. Upon commencement of construction of this expansion, applicability of the Federal Plan at 40 CFR 62, Subpart OOO will end, and applicability of 40 CFR 60, Subpart XXX will begin.
- Deletion of Condition 3.2.1's 25-ton NO<sub>x</sub> limit, which has become obsolete, and Condition 5.2.1.a., which is a monitoring requirement created for practical enforceability of the 25-ton limit.
- Deletion of Condition 3.3.4's requirement for an SSM Plan, which has become obsolete, and Conditions involving the SSM Plan.
- Removal from the permit of the ES02 Leachate Evaporator, which was not constructed and is no longer proposed.
- Removal from the permit of the CD04 Open Flare, which is being retired from service due to its age.
- Recognition of the Eagle Point Landfill High Btu Facility as a disaggregated separate source in accordance with the April 30, 2018, US EPA precedent involving Meadowbrook Energy LLC (see Appendix D).

## B. Equipment List for the Process

**Modified Table**

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
01	Municipal Solid Waste Landfill	40 CFR 60 Subpart A 40 CFR 60 Subpart XXX 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)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(n)	CD01 CD02 CD03 (portable) CD06 (portable)	4,500 scfm Open Flare 3,000 scfm Open Flare 793 scfm Open Flare 3,000 scfm Open Flare

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

## C. Equipment &amp; Rule Applicability

**Emission and Operating Caps –**

Deletion of Condition 3.2.1's 25-ton NO<sub>x</sub> limit.

## D. Permit Conditions

Removal from the permit of the ES02 Leachate Evaporation which was not constructed and is no longer proposed, modifying or deleting Conditions 3.2.1, 3.4.3, 3.4.4, 4.2.4, and 5.2.1.

Removal from the permit of the CD04 Open Flare which has been retired from service, modifying or deleting Conditions 3.3.3, 3.4.3, 3.4.4, and 5.2.1.

Removal from the permit of the SSM Plan which is longer required upon the modification of CFR Part 63 Subpart A based on the ruling that emission standards shall apply at all times deleting Conditions 3.3.4, 6.1.7c.i, and 6.2.20.

Conditions 3.3.2 and 3.3.3 were modified to meet the requirements of NSPS 60 Subpart XXX and 40 CFR 63 Subpart AAAA.

**Note that per 40 CFR 60.762(b)(2)(iv), as the facility has begun complying with the 40 CFR 63.1958, 63.1960, and 63.1961, it is no longer allowed to comply with 40 CFR 60.763, 60.765, and 60.766.**

**V. Testing Requirements (with Associated Record Keeping and Reporting)**

Condition 4.2.1 was modified to remove the reference to 40 CFR 752(b)(2)(v) and replace it with references to 40 CFR 60 Subpart XXX and 40 CFR 63 Subpart AAAA when it is time to determine the NMOC emission rate when it is time to determine when the collection and control system may be removed as provided.

Conditions 4.2.2, 4.2.4 and 4.2.5 were deleted because the ES02 Leachate Evaporator is not going to be constructed.

Condition 4.2.3 was updated to reference 40 CFR 60 Subpart XXX and 40 CFR 63 Subpart AAAA instead of 40 CFR 60 Subpart WWW.

**VI. Monitoring Requirements (with Associated Record Keeping and Reporting)**

Conditions 5.2.1 thru 5.2.3 was modified to delete the references to the ES02 Leachate Evaporator and replace the references to 40 CFR 60 Subpart WWW with 40 CFR 60 Subpart XXX and 40 CFR 63 Subpart AAAA as needed.

Condition 5.2.4 was modified to include the references to 6.2.22, 6.2.23 and 6.2.24, containing references to 40 CFR 63 Subpart AAAA.

Condition 5.2.5 was modified to correct the references from 40 CFR 60 Subpart WWW to 40 CFR 63 Subpart AAAA.

Condition 5.2.6 was modified to correct the reference to 6.1.7b.iii only and reference 6.2.22, 6.2.23, 6.2.24 and 6.2.25.

Conditions 5.2.7 through 5.2.9 were modified to correct the references to 40 CFR 63 Subpart AAAA.

Condition 5.2.10 was added to provide further requirements for 40 CFR 63 Subpart AAAA.

## **VII. Other Record Keeping and Reporting Requirements**

Condition 6.1.7b.i was deleted because the Condition 3.2.1 containing the 24.9 tpy per twelve consecutive months limit was deleted. The rest of condition was updated to reflect 40 CFR 60 Subpart XXX instead of 40 CFR 60 Subpart WWW.

Condition 6.1.7b.iv was deleted because of the updated operational limits of Condition 3.2.2 to reflect 40 CFR Part 60 Subpart XXX and 40 CFR Part 63 Subpart AAAA.

Condition 6.1.7c.i. was deleted because the Condition 3.2.4 containing the SSM Plan requirement was deleted.

Condition 6.1.7d was modified to add the rest of the provisions of 40 CFR 63 Subpart AAAA.

Conditions 6.2.1 through 6.2.6 and 6.2.17 through 6.2.18 were updated to the requirements of 40 CFR 60 Subpart XXX.

Condition 6.2.19 was deleted because, according to 40 CFR 60.762(b)(2)(iv), it can't be updated to reflect 40 CFR 60 Subpart XXX instead of 40 CFR 60 Subpart WWW as it is not allowed to follow 40 CFR 60.753 and must instead follow 40 CFR 63.1958. Reporting for those provisions is in Condition 6.2.22.

Condition 6.2.20 was deleted because the Condition 3.2.4 containing the SSM Plan requirement was deleted.

New Conditions 6.2.22, 6.2.23, 6.2.24 and 6.2.25 were added to provide further requirements for 40 CFR 63 Subpart AAAA.

**Addendum to Narrative**

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//