

Facility Name: **Bartow County MSW Landfill**
City: Cartersville
County: Bartow
AIRS #: 04-13-015-00103

Application #: TV-589594
Date Application Received: October 1, 2021
Permit No: 4953-015-0103-V-04-0

Program	Review Engineers	Review Managers
SSPP	Cynthia Dorrough	Hamid Yavari
ISMU	Joanna Pecko	Dan McCain
SSCP	n/a	n/a
Toxics	Sonakshi Kumar	William Fleming
Permitting Program Manager		Stephen Damaske

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The 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 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: Bartow County MSW Landfill

2. Parent/Holding Company Name

Bartow County

3. Previous and/or Other Name(s)

Bartow County SR 294 LF

4. Facility Location

40 Alatoona Dam Road
Cartersville, GA 30120

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

The facility is located in Bartow County which designates as a non-attainment area for the PM_{2.5} standard, and attainment for all other air pollutants. The facility is not a major source for any air pollutant.

B. Site Determination

The Bartow LFG LLC, a revoked permit (No. 4953-015-0116-V-01-0) was located on the site with the landfill. However, the LFG fired power plant was never built and the permit was revoked on June 11, 2015. The company did not state any other facilities were located near the site.

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
4953-015-0103-V-03-0	20-Apr-2017	Title V Renewal

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)

Bartow County MSW Landfill does not produce a product.

3. Overall Facility Process Description

Municipal Solid Wastes and Non-Hazardous Industrial Solid Wastes are received at the facility from collection and transport vehicles. Wastes are unloaded at the active working face and compacted into place. Cover material of soil or alternative cover material is placed over the compacted wastes daily. When a cell reaches permitted capacity it is covered with a geosynthetic material and then capped with two feet of compacted clay and six inches of topsoil (Phase III).

Initially aerobic bacteria, and then anaerobic bacteria feed on the in-place wastes. Byproducts of this biological activity include landfill gas (LFG) that is composed primarily of methane (CH₄) and carbon dioxide (CO₂). Methane is present generally in concentrations ranging from 45 to 58 percent by volume and CO₂ in concentrations from 35 to 50 percent by volume. Other components of LFG include oxygen (O₂), nitrogen (N₂), water vapor, non-methane organic compounds (NMOC) and other trace gases.

A voluntary landfill gas extraction and control system has been installed at the facility. Gas is extracted from Phase 1 and Phase 2 and combusted in a small utility (open) flare. The GCCS only covers about 40% of the facility.

Landfill activities also generate leachate. Leachate is the liquid that comes from or comes in contact with solid wastes and contains contaminants from the solid wastes. Leachate is collected from the collection system at the bottom of each cell and pumped to the one of two (2) leachate collection ponds. Leachate from the older cells is pumped from the pond and discharged to the Phase III Leachate pond. Leachate from the Phase III pond is pumped to a gravity sewer to the Bartow County sanitary sewer system.

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 a NAA NSR true minor source for NO_x, VOC, PM_{2.5}, and a PSD true minor source for all other criteria air pollutants. The facility is also a true minor source for all HAPS. Note that landfills are not one of the 28 listed source categories that have a 100-tpy PSD major source threshold, per 52.21. Therefore, fugitive emissions are not counted toward any PSD major source threshold.

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 ₁₀	yes			✓
PM _{2.5}	yes			✓
SO ₂	yes			✓
VOC	yes			✓
NO _x	yes			✓
CO	yes			✓
TRS	yes			✓
H ₂ S	yes			✓
Individual HAP	yes			✓
Total HAPs	yes			✓

3. MACT Standards

The Landfill MACT, found in 40 CFR Part 63 Subpart AAAA, "National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills, indicates that the MACT 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 NMOC emissions exceeding 50 Mg/yr.

The MACT standard is not currently applicable to this landfill site. While the landfill design capacity is more than the above capacity threshold, the NMOC emissions are less than the LFG

threshold of 50 Mg/year. Therefore, this permit does not have any permit conditions that apply to construction and operation of the GCCS.

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	no
Program Code M – Part 63 NESHAP	yes
Program Code V – Title V	yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

40 CFR 61 Subpart M – NESHAP for Asbestos

The landfill is subject to 40 CFR Part 61 Subpart M – NESHAP for Asbestos because the landfill may dispose of asbestos-containing materials. As long as the landfill remains active, it will be required to comply with the provisions of 40 CFR 61.154 – “Standard for Active Waste Disposal Sites”, including all reporting and record keeping requirements. Upon closure, the Facility will then be required to comply with 40 CFR 61.151 – “Standard for Inactive Waste Disposal Sites for Asbestos Mills and Manufacturing and Fabricating Operations.”

40 CFR 62 Subpart OOO – Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction on or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 2014.

According to the March 26, 2020 amendments to several Federal landfill regulations at 85 FR 17244, the facility’s regulatory applicability is entering a transition period. As of this application submittal, the facility is subject to 40 CFR Part 62 Subpart OOO, the federal plan that implements 40 CFR 60, Subpart Cf as it meets all the following criteria:

- ▶ The facility was constructed before July 17, 2014;
- ▶ The facility has not undergone “modification or reconstruction” as defined in 40 CFR 60.2 since July 17, 2014;
- ▶ The facility has accepted waste at any time since November 8, 1987; and
- ▶ Its permitted design capacity is greater than 2.5 million megagrams.

Pursuant to 40 CFR 60.750(d)(1), the facility is no longer subject to New Source Performance Review (NSPS) Subpart WWW as it has become subject to the more stringent requirements in an approved State or Federal plan that implements 40 CFR 60, Subpart Cf.

40 CFR 62 Subpart OOO is applicable to each municipal solid waste facility that meets the requirements outlined in 40 CFR 62.16711(a)(1) and (a)(2).

- 1) The municipal solid waste landfill commenced construction, reconstruction, or modification on or before July 17, 2014.
- 2) The municipal solid waste landfill has accepted waste at any time since November 8, 1987, or the landfill has additional capacity for future waste deposition.

Bartow County MSW Landfill has a design capacity exceeding 2.5 million cubic meters, commenced construction before July 17, 2014, has accepted waste since November 8, 1987, and currently is not subject to an EPA-approved state plan. Upon the finalization of Georgia Rule (ggg) in an EPA-approved state plan, the landfill will no longer be subject to Federal Plan OOO.

40 CFR 62 Subpart OOO requires the NMOC emission rate must be recalculated annually, except as provided in §62.16724(c)(3) and submit an annual NMOC emission rate report according to 62.16724(c) until such time as the calculated NMOC emission rate is equal to or greater than 34 Mg per year or the landfill closes. If the calculated NMOC emission rate is equal to or greater than 34 Mg, the owner must either comply with 62.16714(b) or (c), calculate NMOC emissions using the next higher tier, or conduct a surface emission monitoring demonstration using the procedures specified in 62.1678(a)(6). If the landfill is permanently closed, a closure report must be submitted. If calculated NMOC emission rate is equal to or greater than 34 Mg using Tier 1, 2, or 3, the owner must submit a collection and control system design plan within 1 year or conduct surface monitoring.

The NMOC emission rate must be recalculated annually, except as provided in §62.16724(c)(3) and submit an annual NMOC emission rate report according to 62.16724(c) until such time as the calculated NMOC emission rate is equal to or greater than 34 Mg per year or the landfill closes. If the calculated NMOC emission rate is equal to or greater than 34 Mg, the owner must either comply with 62.16714(b) or (c), calculate NMOC emissions using the next higher tier, or conduct a surface emission monitoring demonstration using the procedures specified in 62.1678(a)(6). If the landfill is permanently closed, a closure report must be submitted. If calculated NMOC emission rate is equal to or greater than 34 Mg using Tier 1, 2, or 3, the owner must submit a collection and control system design plan within 1 year or conduct surface monitoring.

Startup of a MSW landfill air emission collection and control equipment that is capable of meeting the emission standards of § 62.16714 must be completed within 30 months after the date of the most recent NMOC emission rate report that shows NMOC emissions equal or exceed 34 megagrams per year, or if Tier 4 surface emissions monitoring (SEM) shows a surface emission concentration of 500 parts per million methane or greater.

Currently, the NMOC emission rate calculation using Tier 2 does not exceed the Subpart OOO threshold of 34 Mg per year; therefore, a landfill gas collection and control system (GCCS) is not required to be installed (Tier 2 testing at the Facility on January 19, 2022 indicates that the NMOC emission rate is 13.0 megagrams per year for 2021).

Proposed Georgia Rule (ggg) Existing Municipal Solid Waste Landfills

The provision of this subparagraph [Rule 391-3-1-.02(2)(ggg)] are applicable **AFTER** the approval of Georgia's state plan implementing the revised Emissions Guidelines for existing MSW Landfills (40 CFR Part 60 Subpart Cf). Currently, Rule (ggg) is not an EPA approved state plan and does not apply to the landfill; however, Rule (ggg) often cites 40 CFR 60 Subpart Cf and both are comparable to the Federal Operating Plan OOO. Rule (ggg) and Federal Operating Plan OOO are incorporated into the Permit. Therefore, when Rule (ggg) becomes an approved plan, the Permit will not require amending.

The provisions of this subparagraph apply to each existing municipal solid waste landfill that commenced construction, reconstruction, or modification on or before July 17, 2014 and has either accepted waste at any time since November 8, 1987 or has additional design capacity available for future waste deposition.

The owner or operator of a MSW landfill subject to this subparagraph with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters is subject to the requirements to obtain a Part 70 operating permit.

Each owner or operator of an MSW landfill shall calculate an initial NMOC emission rate for the landfill using the procedures specified in §60.35f(a). The NMOC emission rate must be recalculated annually, except as provided in § 60.38f(c)(3).

- 1) If the calculated NMOC emission rate is less than 34 megagrams per year, the owner or operator must:
 - a) Submit an annual NMOC emission rate report according to §60.38f(c), except as provided in §60.38f(c)(3); and
 - b) Recalculate the NMOC emission rate annually using the procedures specified in § 60.35f(a) until such time as the calculated NMOC emission rate is equal to or greater than 34 megagrams per year, or the landfill is closed.
- 2) If the calculated NMOC emission rate is equal to or greater than 34 megagrams per year using Tier 1, 2, or 3 procedures, the owner or operator must either: submit a collection and control system design plan prepared by a professional engineer to the Administrator within 1 year as specified in §60.38f(d), except for exemptions allowed under §60.31f(e)(3); calculate NMOC emissions using a higher tier in §60.35f; or conduct a surface emission monitoring demonstration using the procedures specified in §60.35f(a)(6).

Rule (ggg) requires a landfill to collect and control MSW landfill emissions if the following:

- 1) The landfill has an NMOC emission rate greater than or equal to 34 megagrams per year or Tier 4 surface emissions monitoring shows a surface emission concentration of 500 parts per million methane or greater.
- 2) The landfill in the closed landfill subcategory and has an NMOC emission rate greater than or equal to 50 megagrams per year or Tier 4 surface emissions monitoring shows a surface emission concentration of 500 parts per million methane or greater.

Installation and start up of the collection and control system that captures the gas generated within the landfill must occur within 30 months after:

- 1) The first annual report in which the NMOC emission rate equals or exceeds 34 megagrams per year, unless Tier 2 or Tier 3 sampling demonstrates that the NMOC emission rate is less than 34 megagrams per year, as specified in §60.38f(d)(4); or
- 2) The first annual NMOC emission rate report for a landfill in the closed landfill subcategory in which the NMOC emission rate equals or exceeds 50 megagrams per year, unless Tier 2 or

Tier 3 sampling demonstrates that the NMOC emission rate is less than 50 megagrams per year, as specified in §60.38f(d)(4); or

- 3) The most recent NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 megagrams per year based on Tier 2, if the Tier 4 surface emissions monitoring shows a surface methane emission concentration of 500 parts per million methane or greater as specified in §60.38f(d)(4)(iii).

Planning, awarding of contracts, installing, and starting up MSW landfill air emission collection and control equipment that is capable of meeting the Emission Guidelines under § 60.33f must be completed within 30 months after the date an NMOC emission rate report shows NMOC emissions equal or exceed 34 megagrams per year (50 megagrams per year for the closed landfill subcategory); or within 30 months after the date of the most recent NMOC emission rate report that shows NMOC emissions equal or exceed 34 megagrams per year (50 megagrams per year for the closed landfill subcategory), if Tier 4 surface emissions monitoring shows a surface emission concentration of 500 parts per million methane or greater.

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

You are subject to this subpart if you own or operate an MSW landfill that has accepted waste since November 8, 1987, or has additional capacity for waste deposition and meets any one of the three criteria in paragraphs (a)(1) through (3) of this section:

- (1) Your MSW landfill is a major source as defined in § 63.2 of subpart A.
- (2) Your MSW landfill is collocated with a major source as defined in § 63.2 of subpart A.
- (3) Your MSW landfill is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to § 63.1959.

You are subject to this subpart if you own or operate an MSW landfill that has accepted waste since November 8, 1987, or has additional capacity for waste deposition, that includes a bioreactor, as defined in § 63.1990, and that meets any one of the criteria in paragraphs (b)(1) through (3) of this section:

- (1) Your MSW landfill is a major source as defined in § 63.2 of subpart A.
- (2) Your MSW landfill is collocated with a major source as defined in § 63.2 of subpart A.
- (3) Your MSW landfill is an area source landfill that has a design capacity equal to or greater than 2.5 million Mg and 2.5 million m³ and that is not permanently closed as of January 16, 2003.

According to 40 CFR 63.1935(3), an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) and has estimated uncontrolled

emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to 40 CFR 63.1959 is subject to Subpart AAAA.

The facility is an area source of HAP and has design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters. However, the facility has estimated NMOC generation rates less than 50 megagrams per year; therefore, the facility is not subject to Subpart AAAA.

As indicated, the facility has voluntarily installed a GCCS and an open flare to collect and combust landfill gas; this does not affect the applicability of Subpart AAAA. When the requirements outlined in the rule are met, 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 and/or begins adding liquids, other than leachate, in a controlled fashion to the waste mass, which would trigger the provisions for a bioreactor.

C. Compliance Status

The facility did not submit a form F.2, Compliance Plan for Non-Compliant Emission Unit or Group with the renewal Title V application or application update. This indicates that the source believes itself to be in compliance with all Air Quality Rules as of the application dates.

D. Permit Conditions

Permit Condition 2.2.1 establishes the applicability of 40 CFR 61 Subpart A and Subpart M to the landfill.

Permit Condition 2.2.2 establishes the applicability of 40 CFR 62 Subparts A and OOO for the landfill.

Permit Condition 2.2.3 establishes the applicability of 40 CFR 63 Subparts A and AAAA to the landfill with the requirements of the NESHAP if a GCCS is installed due to NMOC exceeding 50 Mg.

Permit Condition 2.3.1 establishes that the Permittee shall comply with all applicable provisions of the Georgia Rule 391-2-1-.02(2)(ggg), "Existing Municipal Solid Waste Landfills," once the Rule becomes an EPA-approved state plan implementing 40 CFR 60 Subpart Cf.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
LF-1	Landfill	40 CFR Part 61, Subpart A** 40 CFR Part 61, Subpart M** 40 CFR Part 62, Subpart A 40 CFR Part 62, Subpart OOO 40 CFR Part 63, Subpart A*** 40 CFR Part 63, Subpart AAAA*** 391-3-1-.02(2)(n)		Flare (voluntary)

B. Equipment & Rule Applicability

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 due to 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.

C. Permit Conditions

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

Permit Conditions 3.4.1 and 3.4.2, re-stating the Georgia Rule (n) fugitive dust rule to assure that the landfill operators understand that they must take all reasonable precautions when moving dirt and limiting opacity to 20 percent.

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 (or sixty (60) days for tests required by 40 CFR Part 63) 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

The latest calculated NMOC emission rate, based on Tier 2, did not exceed 50 megagrams per year. Therefore, the facility has not been required to submit a GCCS plan but must submit annual NMOC emission rate estimates. However, if any emission rate estimate, based on Tier 2, submitted to the Division is greater than or equal to 50 megagrams per year, a Gas Collection and Control Plan is required to be submitted, unless the landfill chooses to recalculate the emission rate using Tier 3.

Permit Conditions No. 4.2.1 through 4.2.4 provide the procedures to be followed to calculate the NMOC emissions for an uncontrolled landfill using Tier 2 or Tier 3.

Permit Condition 4.2.5 states the date by which the facility must conduct retesting to determine the site-specific Non-Methane Organic Compounds (NMOC) concentration of the landfill gas to determine the need for installing a GCCS. This test must be performed every five years, to retain authorization to calculate the NMOC emissions rate using Tier 2 equations.

Permit Conditions 4.2.6 and 4.2.7 provide the procedures to be followed to calculate the NMOC emissions for an uncontrolled landfill using Tier 4.

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

Not 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

Landfill regulation 40 CFR 62 Subpart OOO requires the Permittee to submit an estimate of NMOC emissions in an NMOC emission rate report according to § 62.16724(c) and recalculate the NMOC mass emission rate annually as required under § 62.16714(e). If the NMOC emissions exceed 34 megagrams per year, the landfill must either calculate emissions at a higher tier (e.g., move from Tier 2 to Tier 3) or submit a Collection and Control System (GCCS) Design Plan that has been prepared by a Professional Engineer. Subpart OOO requires the landfill to keep accessible records of design capacity and waste in place and may exclude areas containing nondegradable waste from the GCCS if sufficient records are kept.

Landfills that accept asbestos-containing waste are subject to 40 CFR 61 Subpart M. These landfills are required to comply with 40 CFR 61.154 and, upon closure, submit records of asbestos disposal locations and quantities.

Permit Conditions 6.2.1 through 6.2.3 include the requirements for submitting annual NMOC emission rate reports and the procedures to be taken when a NMOC emission rate report exceeds 50 megagrams per year (i.e., calculate emissions by a higher tier or submit a GCCS design plan).

Permit Condition 6.2.4 states that a NMOC emission report is not required after a GCCS, which meets the requirements of Subpart OOO, has been installed.

Permit Condition 6.2.5 requires that the Facility keep records of the maximum design capacity of the landfill, the current amount of solid waste in place, and the year-by-year waste acceptance rate.

Permit Condition 6.2.6 contains requirements for excluding areas of the landfill from the GCCS design when it is required, which contain deposited asbestos or nondegradable waste.

Permit Condition 6.2.7 contains an allowance for excluding any nonproductive area of the landfill from the GCCS design. The Permittee may exclude an area if an NMOC emission from that area is less than 1 percent of the landfill's total NMOC emissions.

Permit Condition 6.2.8 requires a report when the landfill stops accepting waste in order to close the landfill.

Permit Condition 6.2.9 requires the Facility to submit a Leachate Addition Report to the Division and to EPA annually, if the Permittee has employed leachate recirculation or add liquids other than leachate within the last 10 years.

Permit Condition 6.2.10 requires the Facility to keep records should the Permittee be required to report per Permit Condition 6.2.9.

Permit Condition 6.2.11 allows the Permittee to elect Tier 4 testing to comply with specific surface methane emissions if the NMOC emission rate report submitted in compliance with 6.2.1 is greater than or equal to 34 megagrams per year but less than 50 megagrams per year.

Permit Condition 6.2.12 requires the Permittee to provide a notification of the date(s) upon which the Permittee intends to conduct the Tier 4 measurements, including any delays that may surface due to weather conditions.

Permit Condition 6.2.13 requires the Permittee keep for at least 5 years up-to-date, readily accessible records of all surface emissions monitoring and information related to monitoring instrument calibrations conducted.

Permit Condition 6.2.14 requires the Permittee submit reports specified in Condition 6.2.9 or 6.2.11, along with all subsequent reports, to EPA via the CEDRI by the deadlines specified in this permit, regardless of the method.

Permit Conditions 6.2.15 and 6.2.16 contain requirements from 40 CFR 61 Subpart M which are applicable if the landfill accepts asbestos-containing waste.

Permit Condition 6.2.17 requires implementing their dust suppression plan to ensure that the landfill complies with Georgia Rule (n).

Permit Conditions 6.2.18 through 6.2.20 contain requirements which are applicable, if the landfill adds any liquid (other than leachate) to the landfill. The landfill may become subject to the bioreactor requirements in 40 CFR 63 Subpart AAAA if liquids (other than leachate) are added.

Permit Condition 6.2.21 requires the Facility to notify the Division when there is any increase in the design capacity of the landfill.

VII. Specific Requirements**A. Operational Flexibility**

Not applicable.

B. Alternative Requirements

Not applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

Not applicable.

E. Short-Term Activities

Permit Condition 7.6.1, regarding maintenance of records for construction and capping (closure) of a landfill cell, has been included in the renewal permit. These short-term activities are normal at a landfill.

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

Bartow County MSW Landfill has air conditioners or refrigeration equipment that uses CBC's, HCFC's or other stratospheric ozone depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B. The facility is subject to 40 CFR Part 82, Subpart A-"Production and Consumption Control", Appendix A and B. The Title V permit application indicates that the facility does not have any air conditioner or piece of refrigeration equipment that contains a refrigerant charge of greater than 50 lbs. The Title V permit application also indicates that the facility personnel do not maintain, service, repair or dispose of any motor vehicle air conditioners (MVAC's)

or appliances. Therefore, the facility is not subject to 40 CFR 82, Subpart B-“Servicing of Motor Vehicle Air Conditioners.”

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.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

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.//