Facility Name: **Chesser Island Road Landfill**
City: Folkston
County: Charlton
AIRS #: 04-13-049-00008

Application #: TV-606561
Date Application Received: October 28, 2021
Permit No: 4953-049-0008-V-04-0

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SSPP	Cynthia Dorrough	Hamid Yavari
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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: Chesser Island Road Landfill

2. Parent/Holding Company Name: Chesser Island Road Landfill, Inc.

3. Previous and/or Other Name(s): None

4. Facility Location

367 Chesser Island Road
Folkston, Georgia 31537, Charlton County

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

The facility is located in an attainment area.

B. Site Determination

Waste Management (WM) owns a large tract of land that contains two landfills. One is active and the other, located a mile from it, across some woods, is their old inactive landfill. The two landfilling areas, including the land between the two areas, are on one parcel of land that is owned by Waste Management. Based on previous decisions, and since these two landfills are under common control, EPD has determined that the landfills are one site for Title V. WM also believes them to be one site.

There are no other site determination issues regarding this facility.

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
4953-049-0008-V-03-0	May 18, 2017	Title V Renewal
Off-Permit Change	December 13, 2019	Installation and operation of an emergency generator.
4953-049-0008-V-04-1	January 4, 2023	Installation of a 5,600 scfm flare

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)

Chesser Island Road Landfill processes Municipal Solid Waste (MSW) and other wastes; the processed waste is deposited into the landfill. Through anaerobic activity, the landfill produces landfill gas (LFG).

3. Overall Facility Process Description

Chesser Island Road Landfill receives, manages, and disposes of municipal solid waste, coal combustion residue, construction & demolition (C & D) waste, contaminated soil, and other wastes as permitted. The waste is dumped directly on an active cell of the landfill and spread out; soil cover is applied and then waste, and soil is compacted. Soil cover is applied daily.

Chesser Island Road Landfill consists of two separate landfill areas that are considered one site for Title V purposes. The “closed site” consists of Phase 1 and 2. This site does not receive waste and was completely capped as of July 15, 2003. In a letter dated, December 21, 2011, the Division determined the “closed site” contributes less than 1 percent of the total NMOC to the total NMOC emitted by the 2-landfill site and was therefore exempt from the collection requirements of 40 CFR 60 Subpart WWW. The “active site” consists of Phase 3 and was subject to the collection and control requirements of 40 CFR 60 Subpart WWW and uses an open flare to control landfill gas emissions.

On June 21, 2021, Chesser Island Road Landfill became subject to 40 CFR 62 Subpart OOO and is complying with the revised requirements of 40 CFR 63 Subpart AAAA as of September 27, 2021. Therefore, Chesser Island Road Landfill is no longer subject to or required to comply with NSPS WWW. Most of the compliance provisions of Subpart AAAA are duplicative of Subpart OOO. The facility will become subject to EG Cf upon finalization of Georgia Rule (ggg), at which time the facility will no longer be subject to Subpart OOO.

The waste deposited in the landfill decomposes over time and produces landfill gas (LFG). The LFG is composed primarily of methane and carbon dioxide with small amounts of nonmethane organic compounds (NMOC) and inorganic compounds. The LFG is collected under vacuum by a series of vertical and horizontal landfill gas collection structures. The collected LFG is controlled by a 3,000 scfm open flare.

The facility also has a solidification process, which it uses to treat liquid waste prior to deposition in the landfill, by mixing it with fly ash (solidification agent) in a pug mill. The solidified material is then transported to an active cell for disposal.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This facility is a minor source in respect to PSD. Potential emissions of each criteria pollutant are below 250 tons per year. Nonattainment NSR does not apply because the source is located in an area deemed to be in attainment for all pollutants.

2. Title V Major Source Status by Pollutant

//If a pollutant is not emitted from the facility, state "n/a" for that pollutant in Table 2 below (2nd column). For each pollutant emitted from the facility, place a mark (✓) in the appropriate box in Table 3 below (3rd, 4th, or 5th column).//

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	Y			✓
PM_{10}	Y			✓
$PM_{2.5}$	Y			✓
SO_2	Y			✓
VOC	Y			✓
NO_x	Y			✓
CO	Y	✓		
TRS	N			n/a
H_2S	N			n/a
Individual HAP	Y			✓
Total HAPs	Y			✓

3. MACT Standards

   The Landfill MACT, 40 CFR Part 63 Subpart AAAA, indicates that the MACT is applicable to each MSW landfill with a design capacity greater than or equal to 2.5 million Mg and 2.5 million m^3 and that has estimated uncontrolled NMOC emissions exceeding 50 Mg/yr.

   The facility is allowed to accept asbestos-containing waste and is therefore subject to 40 CFR Part 61 Subpart M "National Emission Standard for 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	n
Program Code 8 – Part 61 NESHAP	y
Program Code 9 – NSPS	n
Program Code M – Part 63 NESHAP	y
Program Code V – Title V	y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

To ensure carbon monoxide (CO) emissions remain below major Prevention of Significant Deterioration (PSD) thresholds, the facility proposes to take a facility-wide CO limit of 237.6 tons during any 12-consecutive month period.

B. Applicable Rules and Regulations

40 CFR 61 Subpart M - National Emission Standard for Asbestos
The facility is allowed to accept asbestos-containing waste and is therefore subject to this subpart.

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 17, 2014

All existing MSW landfills that commenced construction, modification, or reconstruction on or before July 17, 2014 became subject to the new Federal Plan at 40 CFR 62, Subpart OOO starting May 21, 2021, unless they are already subject to an approved state plan implementing NSPS Cf. On June 21, 2021, Chesser Island Road Landfill became subject to 40 CFR 62 Subpart OOO, the Federal Plan that implements Emission Guideline Cf (EG Cf).

On June 21, 2021, Chesser Island Road Landfill became subject to 40 CFR 62 Subpart OOO, the Federal Plan that implements Emission Guideline Cf (EG Cf). The facility is an area source of Hazardous Air Pollutants (HAPs) and is subject to 40 CFR 63 Subpart AAAA. The facility began complying with the revised AAAA requirements on September 27, 2021. All previous reports and approvals granted under NSPS WWW carry forward under Subpart OOO and Subpart AAAA. Since NSPS WWW is no longer applicable when the Permittee submits either a GCCS Design Plan Revision or Title V permit modification, it is not included in this application as an applicable requirement. The site will become subject to a Georgia state rule implementing EG Cf once Georgia's state plan incorporating the rule is approved by EPA.

40 CFR 63 Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills
The facility is an area source of HAP emissions with a design capacity greater than 2.5 MM yd^3. Per 40 CFR 63.1935(a) and (b), the facility is subject if it has estimated uncontrolled NMOC emissions equal to or greater than 50 Mg/yr or it includes a bioreactor. The NMOC emission shows that the facility's calculated NMOC exceeds 50 Mg/yr, therefore it is subject to the applicable requirements of the subpart.

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 2.1.1 upon the construction of open flare OF4, limits facility wide CO emissions such that the emissions during any 12 consecutive month period does not exceed 237.6 tons.

Permit Condition 2.2.1 requires the Permittee to comply with all applicable requirements of 40 CFR Part 62 Subpart A and OOO for the landfill.

Permit Condition 2.2.2 requires the Permittee to comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 61, Subpart A, which contains the NESHAP "General Provisions," and Subpart M – "National Emission Standard for Asbestos."

Permit Condition 2.2.3 requires the Permittee to comply with all applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, Subpart A, which contains the NESHAP "General Provisions," and Subpart AAAA – "National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills."

Permit Condition 2.3.1 established the applicability of 391-3-1-.02(2)(ggg) when Georgia becomes an EPA-approved and currently effective 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	Landfill [Phase 1 & 2: Closed site] And [Phase 3: Active site]	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)	None OF4 EVAP1	Gas collection and control System [GCCS] 5,100 cfm Open Flare (for active site) to replace 3,000 cfm Open Flare Leachate Evaporator System
SP	Solidification Process	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	BH	Silo Baghouses 1. 4,000 scfm 2. 675 scfm

B. Equipment & Rule Applicability

NSPS and NESHAP Rule applicability was discussed in Section II.B of the narrative, please refer to the aforementioned section.

Emission and Operating Caps:

The facility is proposing a total flow limit in the replacement open flare (Source ID: OF3) of 2,365.20 MMscf/year to limit total carbon monoxide (CO) emissions from the flare to 204.1 tons per year (TPY) to avoid being subject to PSD for CO.

Rules and Regulations Assessment:

Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions
This rule limits opacity to 40 percent from any air contaminant source, except as provided in other more restrictive or specific rules or subdivisions of the regulation. The solidification process (Emission Unit ID: SP) is subject to this regulation.

Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes
This rule limits PM emissions from all manufacturing processes. The solidification process is subject to this regulation.

Georgia Rule 391-3-1-.02(2)(n) – Fugitive Dust
This rule requires the Permittee to take reasonable precautions to prevent the occurrence of emissions from fugitive dust. The landfill (Emission Unit ID: LF) and solidification process (Emission Unit ID: SP) are subject to this regulation.

C. Permit Conditions

Permit Condition 3.2.1 limits the total flow in the open flare upon construction such that the total flow during any 12 consecutive month period does not exceed 2,365.20 MMscf to avoid being subject to PSD for CO.

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

Permit Condition 3.3.2 outlines the following requirements specified in 40 CFR 63.1958 "Operational Standards for Collection and Control Systems" for the operation of the landfill and allows the Permittee an option to comply with the alternative requirements in the Division-approved GCCS Plan:

Permit Condition 3.3.3 requires the Permittee to operate an open flare in accordance with 40 CFR 63.11 and 40 CFR 60.18 at all times that any open flare is being used to control LFG.

Old Permit Condition 3.3.4 was removed in Amendment V-03-1.

New Permit Condition 3.3.4 requires the Permittee to operate the Leachate Evaporator (Air Pollution Control ID: EVAP1) at all times that collected landfill gas is routed to the evaporator.

New Permit Condition 3.3.5 requires the Permittee to operate the control to either reduce NMOC by 98 percent by weight or reduce the outlet NMOC concentration to less than 20 ppmv, dry basis as hexane at 3 percent oxygen or if a boiler or process heater is used as the control device, the landfill gas stream must be introduced into the flame zone.

Permit Conditions 3.4.1 and 3.4.2 were modified to require the Permittee to comply with Georgia Rule (n) for the leachate evaporator system.

Permit Condition 3.4.3 was modified to require the Permittee to comply with Georgia Rule (e) for the leachate evaporator system.

Permit Condition 3.4.4 was modified to require the Permittee to comply with Georgia Rule (b) for the leachate evaporator system.

Permit Condition 3.4.5 prohibits the Permittee from operating both the existing and the proposed flares at the same time.

Permit Condition 3.5.1 requires the Permittee to maintain an inventory of filter bags such that an adequate supply of bags is on hand to replace any defective bags in the solidification process silo baghouse.

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

Permit Condition 4.1.3 was modified to incorporate testing methods required by the updated 40 CFR 63 Subpart AAAA for the leachate evaporator system.

Permit Condition 4.2.1 was modified to update the acceptable method of determining the NMOC emission rate for the purpose of determining when the collection and control system may be removed as provided in 40 CFR 62.16715(f).

Previous Permit Condition 4.2.6 (renumbered as Permit Condition 4.2.2) requires the Permittee to conduct the initial performance test on the replacement open flare for visible emissions, to determine the heating value of the landfill gas venting to the flare, and to calculate exit velocity from the flare.

Previous Permit Condition 4.2.7 (renumbered as Permit Condition 4.2.3) requires the Permittee to conduct the initial performance test on the leachate evaporator system for reduction efficiency or ppmv.

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

Permit Condition 5.2.1 requires the Permittee to install a continuous monitoring system that measures gas flow rate and a heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself, to indicate the continuous presence of a flame for the open flare, a continuous monitoring system that monitors temperature on the enclosed combustor portion of the evaporator, and a gas flow rate measuring device on the enclosed combustor portion of the evaporator.

Permit Condition 5.2.2 contains the monitoring requirements specified in updated 40 CFR 63 Subpart AAAA, which requires the facility to install a sampling port and a temperature measuring device or an access port for temperature measurements at each wellhead at the landfill.

Permit Conditions 5.2.3 and 5.2.4 contain the monitoring requirements and exceedance correction and reporting requirements specified in updated 40 CFR 63 Subpart AAAA for the measurements of the gauge pressure in the gas collection header at each individual wellhead.

Permit Conditions 5.2.5 and 5.2.6 contain the monitoring requirements and exceedance correction and reporting requirements specified in updated 40 CFR 63 Subpart AAAA for the measurements of the temperature at each wellhead.

In order to demonstrate compliance with the operational standards specified in 40 CFR 63.1958, which are included in Condition 3.3.2, Condition 5.2.7 requires that the facility follow the surface monitoring requirements specified in updated 40 CFR 63 Subpart AAAA.

Permit Condition 5.2.8 contains the instrumentation specifications and procedures specified in updated 40 CFR 63 Subpart AAAA for the surface methane monitoring.

Permit Condition 5.2.9 contains the requirements specified in updated 40 CFR 63 Subpart AAAA. The facility must implement a program to monitor cover integrity and implement cover repairs as necessary on a monthly basis.

Permit Condition 5.2.10 requires the Permittee to measure and record the oxygen or nitrogen concentration in each wellhead in the active collection system.

Permit Condition 5.2.11 outlines the procedures the Permittee must follow in the event of an exceedance of the wellhead temperature standard, as specified in Condition 6.1.7b.ii.

Permit Condition 5.2.12 outlines the procedures the Permittee must follow in the event a temperature greater than or equal to 73.9°C (165 degrees Fahrenheit) is measured.

Permit Condition 5.2.13 outlines the procedures the Permittee must follow in the event the temperature is greater than or equal to 76.7 °C (170 degrees Fahrenheit) is measured.

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

Permit Condition 6.1.7b.iv. was added to include the description and duration of all periods when an open flare is not operating for a period exceeding 1 hour while receiving landfill gas and the total length of time when an open flare is not operating during the reporting period as an exceedance.

Permit Condition 6.1.7b.vi was added to include all 3-hour periods of operation during which the average temperature was more than 28 degrees Celsius (82 degrees Fahrenheit) below the average combustion temperature during the most recent performance test at which compliance with 40 CFR 63.1959(b)(2)(iii) was determined as an exceedance.

Permit Condition 6.1.7b.vii was added to include any month in which total facility wide emissions of carbon monoxide was calculated to exceed 237.6 tons for the 12-consecutive month period.

Permit Condition 6.2.1 requires keeping on-site records of the maximum design capacity, amount of solid waste in place, and the year-by-year acceptance rates.

Per Permit Condition No. 6.2.2 and 6.2.3, the facility must comply with the applicable provisions and reporting requirements in 40 CFR 61 Subpart M, which are found in 40 CFR 61.154. The facility must also maintain records containing the quantity and location of all the asbestos placed in the landfill. The facility is responsible for reporting any discrepancies in the quantity of waste received and to maintain these records for two years, per 40 CFR 61.154.

Permit Conditions 6.2.4 and 6.2.5, 6.2.11 through 6.2.23 outline the recordkeeping requirements in accordance with 40 CFR 63 Subpart AAAA. Many conditions were modified by removing reference to 40 CFR 60 Subpart WWW since the rule is no longer applicable.

Permit Condition No. 6.2.4, the Permittee is authorized to exclude any areas of deposited asbestos or other nondegradable waste from being part of a required Subpart AAAA GCCS.

Permit Condition No. 6.2.5 authorizes the Permittee to exclude any nonproductive area of the landfill from being part of a required 40 CFR 63 Subpart AAAA GCCS, provided it contributes less than 1 percent of the total amount of NMOC emissions from the landfill. This is a new condition.

Once the facility is closed, the records must be submitted to the Administrator of the asbestos NESHAP program, per New Permit Condition No. 6.2.6.

Permit Condition No. 6.2.7 requires the Permittee to implement the Dust Suppression Plan, already approved by the Division, to assure compliance with Georgia Air Quality Rule (n) for fugitive dust. Failure to follow the procedures of the Dust Suppression Plan must be reported as an excursion, as required by Condition No. 6.1.7.

Permit Condition 6.2.8 requires that the facility 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.

Permit Condition 6.2.9 requires that the facility keep calculations of the waste mass moisture content if the landfill adds liquids other than leachate to the landfill. These calculations are to be 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.

Permit Condition 6.2.10 requires that the facility notify the Division if the moisture content of the waste mass exceeds 40 percent by weight. If the moisture content exceeds 40 percent, the facility becomes subject to the bioreactor requirements of Subpart AAAA.

Permit Condition 6.2.11 requires the facility to keep records of the following items for a period of 5 years: average temperature measured at least every 15 minutes and averaged over the same time period of the performance test and the percent reduction of NMOC determined as specified in § 63.1959(b)(2)(iii)(B) achieved by the control device.

If the facility plans to remove the GCCS in the future, Permit Condition 6.2.12 requires that the facility follow the reporting requirements specified in 40 CFR 63.1981(g).

Permit Condition 6.2.13 contains the record keeping requirements specified in 40 CFR 63.1983(b). In particular, the facility must keep, up-to-date and accessible, on-site the records of LFG control equipment as specified by 40 CFR 63.1983(b)(1) through (5) measured during the initial performance test, any subsequent test, or compliance determination.

Permit Condition 6.2.14 contains the record keeping requirements specified in 40 CFR 63.1983(d). In particular, the facility must keep an up-to-date and accessible plot map showing each existing and planned collector in the system, providing a unique identification location label for each collector, and installation date and location of all newly installed collectors.

Permit Condition 6.2.15 contains the record keeping requirements specified in 40 CFR 63.1983(e)(1). In particular, the facility must keep records of all collection and control system exceedances of the operational standards in 40 CFR 63.1958.

Permit Condition 6.2.16 contains the record keeping requirements specified in 40 CFR 63.1983(c)(4). In particular, the facility must keep , up-to-date, readily accessible continuous records of the flame or pilot monitoring specified under 40 CFR 63.1961(c), as specified in Condition 5.2.1b, for Open Flare OF3, and up-to-date, readily accessible records of all periods of operation in which flame or pilot flame is absent.

Permit Condition 6.2.17 requires the Permittee to keep records of all collection and control system exceedances of the operational standards in 40 CFR 63.1958,

Permit Condition 6.2.18 requires the Permittee to keep records of each wellhead temperature monitoring value of 62.8 degrees Celsius (145 degrees Fahrenheit), all enhanced monitoring activities, and the email transmission of each 24-hour high temperature report.

Permit Condition 6.2.19 requires the Permittee to keep records of the root cause analysis conducted for each root cause analysis in which corrective actions are required.

Permit Condition 6.2.20 requires the Permittee to keep records of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the initial reading, and for action(s) not already completed, a schedule for implementation for each root cause analysis for which corrective actions and a corrective action analysis are required.

Permit Condition 6.2.21 requires the Permittee to keep records of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the initial reading, and, for action(s) not already completed, a schedule for implementation, and a copy of any comments or final approval from the Division on the corrective action analysis or schedule for each root cause analysis for which corrective action(s) and a corrective action analysis are required which are expected to require more than 120 days to complete.

Permit Condition 6.2.22 requires the Permittee to report the date, time, well identifier, temperature and carbon monoxide reading via email to the Administrator within 24 hours of any measurement of landfill gas temperature, at either the wellhead or at any point in the well, which is greater than or equal to 76.7 degrees Celsius (170 degrees Fahrenheit) and the carbon monoxide concentration measured is greater than or equal to 1,000 ppmv.

Permit Condition 6.2.23 requires the Permittee to maintain records of the type and amount of fuel combusted in the flares and the leachate evaporator.

Permit Condition 6.2.24 and 6.2.25 requires the Permittee to calculate facility wide emissions of carbon monoxide for each month and each 12-consecutive month period to determine compliance with the limit in Condition 2.2.1.

VII. Specific Requirements

A. Operational Flexibility

None Applicable.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

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

D. Temporary Sources

None Applicable.

E. Short-Term Activities

7.6.1 The short-term activities occur infrequently and for a relatively short duration at the facility. When these activities occur, the Permittee is required to meet all approved (D&O) requirements relating to those activities. Also, the Permittee shall maintain records of the duration and frequency of the following Short-term Activities:

a. Construction of Landfill Cell

b. Capping (Closure) of Landfill Cell

The short-term activities shall be conducted in such a manner that opacity from any fugitive dust source shall not equal or exceed 20 percent.
[391-3-1-.02(2)(n)2]

F. Compliance Schedule/Progress Reports

None Applicable.

G. Emissions Trading

None Applicable.

H. Acid Rain Requirements

None Applicable.

I. Stratospheric Ozone Protection Requirements

None Applicable.

J. Pollution Prevention

None Applicable.

K. Specific Conditions

None 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.//