

Facility Name: **Hickory Ridge MSW Landfill**

City: Conley

County: DeKalb

AIRS #: 04-13-089-00297

Application #: TV-607802

Date Application Received: October 14, 2021

Permit No: 4953-089-0297-V-05-0

Program	Review Engineers	Review Managers
SSPP	Bradley Belflower	Cynthia Dorrough
ISMU	Joanna Pecko	Dan McCain
SSCP	Kenneth Phillips	William Fleming
Toxics	Kenneth Phillips	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:**

Hickory Ridge MSW Landfill

2. Parent/Holding Company Name

Republic Services

3. Previous and/or Other Name(s)

BFI Hickory Ridge (MSWL)
Hickory Ridge Sanitary Landfill

4. Facility Location

3330 Moreland Avenue
Conley, Georgia 30288

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

Hickory Ridge Landfill is located in DeKalb County. DeKalb County was part of the Atlanta 2015 8-Hour Ozone Nonattainment Area. This nonattainment area was officially redesignated as attainment on October 17, 2022. DeKalb County is currently in attainment for all pollutants.

B. Site Determination

Hickory Ridge MSW Landfill and MAS ASB Cogen LLC LFG Cleaning Facility (AIRS No. 089-00339, hereinafter "MAS CCF") are both located on the landfill property. The landfill and the cleaning facility are managed separately. MAS CCF receives collected LFG from Hickory Ridge MSW Landfill, treats and conditions the LFG, and sells it as fuel. Since the LFG treating/conditioning plant is adjacent to the landfill, and its operation is completely dependent on the LFG from the landfill, the landfill and the LFG treating/conditioning plant are considered one site with regard to Title V and New Source Review. Note that MAS CCF operates under its own Title V permit (Permit No. 4932-089-0339-V-04-0).

MAS ASB Cogen, LLC. CHP Facility (AIRS No. 121-00869) purchases the LFG from MAS CCF and burns the fuel in three generator engines and provides electricity to a Coca Cola plant. Please note that MAS CHP is not considered to be part of the landfill Title V site because it is located about 3 miles away, its fuel sources are not limited to only the treated/conditioned LFG (the engines are capable of burning both LFG and natural gas), and their operation is not completely dependent on the combined Title V 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
4953-089-0297-V-04-0	April 18, 2017	Title V renewal

D. Process Description

1. SIC Codes(s)

4953 – Refuse Systems

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)

Hickory Ridge Landfill is a close municipal solid waste landfill. It does not produce a product. Landfill gas generated in the landfill, however, is treated by a third-party and sold as fuel.

3. Overall Facility Process Description

Hickory Ridge MSW Landfill is a closed landfill, which received solid waste until its closure in 2011. The waste was deposited directly into the landfill, compacted, and then covered with fill dirt. The landfill gas (LFG) produced from the decomposition of the deposited waste is collected using an active gas collection and control system (GCCS). The landfill has opted to meet the GCCS requirements of 40 CFR 63 Subpart AAAA. Currently, collected LFG is primarily treated by the MAS ASB Cogen LLC Landfill Gas Cleaning Facility before being injected into a pipeline that transports the treated LFG to the MAS ASB Cogen, LLC CHP Facility where it is combusted in three reciprocating engines to cogenerate heat and electricity. The two flares at the Landfill are backup control systems that flare the LFG when the MAS ASB Cogen, LLC CHP Facility is either down or is unable to process all of the collected LFG.

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 combination of Hickory Ridge Landfill and MAS ASB Cogen LLC Landfill Gas Cleaning Facility is a minor source under PSD and nonattainment NSR regulations. Emissions from all PSD and nonattainment NSR regulated pollutants are less than the 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	N/A			
H ₂ S	N/A			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

40 CFR 63, Subpart AAAAA – “National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills”

The Landfill MACT, 40 CFR 63 Subpart AAAAA, is applicable for existing landfills as of January 16, 2004. This rule applies to each landfill that received waste after November 6, 1987 that is a major source of HAPS, is co-located with a major source of HAPS, is a bioreactor, or has estimated uncontrolled emissions of NMOC greater than or equal to 50 megagrams per year (Mg/yr). Uncontrolled NMOC emissions from the Hickory Ridge

Landfill are greater than 50 Mg/yr. This landfill, therefore, is subject to The Landfill MACT.

Note that the U.S. EPA promulgated changes to Subpart AAAA on March 26, 2020, that makes significant changes to the subpart, including removal of the Startup, Shutdown, and Malfunction (SSM) Plan effective September 27, 2021.

40 CFR Part 61 Subpart M – NESHAP for Asbestos

Landfills that ever accepted or could accept asbestos waste for disposal is subject to the asbestos NESHAP in 40 CFR 61 Subpart M.

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

On August 29, 2016, EPA promulgated 40 CFR 60 Subparts XXX and Cf to regulate emissions from “new” landfills (constructed or modified after July 17, 2014) and establish emission guidelines for “old” landfills. These subparts replaced the requirements of 40 CFR 60 Subpart WWW. On May 21, 2021, EPA promulgated 40 CFR 62 Subpart OOO to provide a federal plan to cover “old” landfills in states where a state plan implementing the requirements of Subpart Cf has not been approved by EPA. The requirements of Subparts XXX, Cf, and OOO are similar to the requirements of Subpart WWW which formerly applied.

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.

This Federal Operation Plan OOO is applicable to each municipal solid waste landfill that has a design capacity greater than 2.5 million megagrams (Mg) or 2.5 million cubic meters (m³). Hickory Ridge Landfill has a design capacity exceeding 2.5 million cubic meters. The landfill is subject to Federal Plan OOO because it commenced construction before July 17, 2014, has not been modified or reconstructed since July 2012, has accepted waste since November 8, 1987, and is not subject to an EPA-approved state plan. Once Georgia Rule (ggg) is an EPA-approved state plan, the landfill will no longer be subject to this Federal Operation Plan.

This Plan duplicates most of the requirements of 40 CFR 60 Subparts WWW and XXX. Hickory Ridge Landfill is in the closed landfill subcategory in this rule.

40 CFR 61 Subpart M – NESHAP for Asbestos

Hickory Ridge Landfill was allowed to accept asbestos-containing waste and is, therefore, subject to the asbestos NESHAP in 40 CFR 61 Subpart M. Because the landfill is closed, it is required to comply with 40 CFR 61.151 – “Standard for Inactive Waste Disposal Sites for Asbestos Mills and Manufacturing and Fabricating Operations”.

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

As stated earlier, Hickory Ridge Landfill is subject to 40 CFR 63 Subpart AAAA. The landfill has opted to comply with the operational standards, compliance provisions, and monitoring requirements of Subpart AAAA instead of the equivalent requirements of 40 CFR 62 Subpart OOO.

391-3-1-.02(2)(ggg) – Existing Municipal Solid Waste Landfills

The provisions of Georgia Rule (ggg) 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 provision of Rule (ggg) apply 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. Rule (ggg), however, 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.

C. Compliance Status

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

D. Permit Conditions

Permit Conditions 2.2.1 through 2.2.3 of the existing permit have been carried over from the existing permit. The language of these conditions has been updated to the most recent version of these conditions used by the Division.

Condition 2.2.1 establishes the applicability of 40 CFR 62 Subparts A and OOO to the landfill. This condition previously established applicability to 40 CFR 60 Subpart WWW.

Condition 2.2.2 establishes the applicability of 40 CFR 61 Subparts A and M to the landfill.

Condition 2.2.3 establishes the applicability of 40 CFR 63 Subparts A and AAAA to the landfill.

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
EU01	MSW Landfill	40 CFR 62 Subpart A	CD01	Gas Collection and Control System
		40 CFR 62 Subpart OOO	CD02	Primary Open Flare
		40 CFR 61 Subpart A		
		40 CFR 61 Subpart M		
		40 CFR 63 Subpart A	CD03	Secondary Open Flare
		40 CFR 63 Subpart AAAA		
		391-3-1-.02(2)(n)		
		391-3-1-.02(2)(ggg)		

B. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

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.

As stated earlier, 40 CFR 62 Subpart OOO applies until Georgia has an EPA-approved state plan implementing 40 CFR 60 Subpart Cf.

40 CFR 61 Subpart M – NESHAP for Asbestos

As stated earlier, 40 CFR 61 Subpart M applies to the landfill.

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

As stated earlier, 40 CFR 63 Subpart AAAA applies to the landfill.

391-3-1-.02(2)(ggg) – Existing Municipal Solid Waste Landfills

As stated earlier, Rule 391-3-1-.02(2)(ggg) applies AFTER Georgia becomes an EPA-approved state plan implementing 40 CFR 60 Subpart Cf.

Georgia Rule 391-3-1-.02(2)(n) – Fugitive Emissions

Georgia Rule (n) requires the facility to minimize fugitive dust from the landfill. This includes using water or chemicals for controlling dust on 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 material on dirt roads, materials, stockpiles, and other similar surfaces. Also per this rule, a landfill may not discharge fugitive dust, which exhibits opacity equal to or greater than 20 percent.

C. Permit Conditions

The conditions in Permit 4953-089-0297-V-04-0 have been updated to reflect that the landfill is now subject to 40 CFR 62 Subpart OOO or 40 CFR 63 Subpart AAAA instead of 40 CFR 60 Subpart WWW.

Condition 3.3.1 (updated from Condition 3.3.1 in Permit 4953-089-0297-V-04-0) includes the GCCS requirements from Subpart AAAA.

Condition 3.3.2 (updated from Condition 3.3.2 in Permit 4953-089-0297-V-04-0) requires that the open flares be designed and operated in accordance with 40 CFR 63.11(b).

Condition 3.3.3 (updated from Condition 3.3.4 in Permit 4953-089-0297-V-04-0) contains the bioreactor requirements from 40 CFR 63 Subpart AAAA if liquid (other than leachate) is added to the landfill in a controlled fashion. Note that changes to Subpart AAAA were promulgated on March 26, 2020. This condition has been updated to reflect the new citations in Subpart AAAA.

Conditions 3.4.1 and 3.4.2 (Conditions 3.4.1 and 3.4.2 in Permit 4953-089-0297-V-04-0) limit fugitive dust and its opacity, in accordance with Rule (n).

One conditions from Permit 4953-089-0297-V-04-0 are not in this permit. As noted earlier, the SSM Plan is no longer required effective September 27, 2021, therefore, Condition 3.3.3 has been deleted.

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 landfill is not allowed to remove its GCCS or the control devices until the landfill's the GCCS has been in operation at least 15 years and the NMOC emission rate falls below 50 megagrams per year. Note that the landfill is in the close landfill subcategory of Subpart OOO, so the NMOC threshold is 50 Mg/yr instead of 34 Mg/yr. The exact procedures for demonstrating that the NMOC emission rate has fallen to a sufficiently low level are found in 40 CFR 63.1959(c) and 63.1957(b). Condition 4.2.1 contains these requirements and is updated from the same condition number in Permit 4953-089-0297-V-04-0 due to the change to Subpart OOO.

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

The Hickory Ridge Landfill is subject to 40 CFR 62 Subpart OOO and 40 CFR 63 Subpart AAAA. The landfill uses open flares to control NMOC and sends landfill gas to a third-party treatment system. For open flares, monitoring for the continuous presence of a flame is required. The landfill is also required to monitor for the flow to the control devices (open flare and third-party facility) by installing a continuous (at least one reading every 15 minutes) flow monitoring device and visually check any bypass lines present.

For each wellhead in the collection system, the landfill is required to install a sample port and a temperature measuring device or access port. Once each month, the landfill is required to determine the gauge pressure, the temperature, and oxygen or nitrogen concentration in each wellhead. Excessive pressure or temperature must be reported as an exceedance. For each exceedance, corrective action and re-monitoring must be conducted on a prescribed schedule.

Once per quarter, the landfill is required to monitor methane concentrations on the surface of the landfill. Excessive concentrations (more than 500 ppm above background concentration) will

require reporting of an exceedance, corrective action, and re-monitoring on a prescribed schedule. A program to monitor for cover integrity and making repairs, on a monthly basis, is also required.

The conditions in Permit 4953-089-0297-V-04-0 have been updated to reflect that the landfill is now subject to 40 CFR 62 Subpart OOO instead of 40 CFR 60 Subpart WWW.

Condition 5.2.1 (updated from Condition 5.2.1 in Permit 4953-089-0297-V-04-0) contains the requirements to monitor (1) presence of a flame on an open flare and (2) flow rate of each control device.

Conditions 5.2.2 through 5.2.7 (updated from Conditions 5.2.2 through 5.2.6 in Permit 4953-089-0297-V-04-0) contain the requirements for wellhead monitoring for temperature, pressure, and oxygen or nitrogen. Conditions 5.2.8 and 5.2.9 (updated from Conditions 5.2.7 and 5.2.8 in Permit 4953-089-0297-V-04-0) contain the requirements for surface methane monitoring. Condition 5.2.10 (updated from Condition 5.2.9 in Permit 4953-089-0297-V-04-0) contains a requirement to monitor landfill cover integrity.

Conditions 5.2.11 and 5.2.12 are new. These conditions require monitoring of any LFG well whose temperature exceeds 145 degrees Fahrenheit.

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

Hickory Ridge Landfill is subject to 40 CFR 62 Subpart OOO and 40 CFR 63 Subpart AAAA which requires the landfill to keep accessible records of design capacity and waste in place and may exclude areas containing non-degradable waste from the GCCS if sufficient records are kept. The landfill accepts asbestos-containing waste and is, therefore, subject to 40 CFR 61 Subpart M. Subpart AAAA also contains bioreactor requirements (if applicable). As noted earlier, a SSM plan is no longer required effective September 27, 2021.

The conditions in Permit 4953-089-0297-V-04-0 have been updated to reflect that the landfill is now subject to 40 CFR 62 Subpart OOO or 40 CFR 63 Subpart AAAA instead of 40 CFR 60 Subpart WWW.

Condition 6.2.1 (updated from Condition 6.2.8 in Permit 4953-089-0297-V-04-0) requires a report when the landfill removes or ceases to operate control equipment.

Condition 6.2.2 (updated from Condition 6.2.1 in Permit 4953-089-0297-V-04-0) 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.

Condition 6.2.3 (updated from Condition 6.2.9 in Permit 4953-089-0297-V-04-0) requires records of the GCCS components.

Condition 6.2.4 (updated from Condition 6.2.10 in Permit 4953-089-0297-V-04-0) requires records of existing and planned collectors in the GCCS.

Condition 6.2.5 (updated from Condition 6.2.11 in Permit 4953-089-0297-V-04-0) requires records of GCCS exceedances.

Condition 6.2.6 requires a report when a required GCCS corrective actions take longer than prescribed in Subpart AAAA. This is a new requirement in Subpart AAAA.

Condition 6.2.7 requires records of continuous presence of a flame in the open flares. This condition was not in the previous permit.

Condition 6.2.8 requires records of periods when the GCCS or control devices are not operating. This is a new requirement in Subpart AAAA.

Conditions 6.2.9 and 6.2.10 (updated from Conditions 6.2.3 and 6.2.4 in Permit 4953-089-0297-V-04-0) contains requirements for excluding areas of the landfill from the GCCS design, when it is required, due to the area being nonproductive of LFG or which contain non-degradable waste.

Condition 6.2.11 (updated from Condition 6.2.2 in Permit 4953-089-0297-V-04-0) contain requirements from 40 CFR 61 Subpart M which are applicable if the landfill accepted asbestos-containing waste.

Conditions 6.2.12 through 6.2.14 (updated from Conditions 6.2.12 through 6.2.14 in Permit 4953-089-0297-V-04-0) 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.

Condition 6.2.15 (updated from Condition 6.2.5 in Permit 4953-089-0297-V-04-0) requires records demonstrating implementation of their dust suppression plan to ensure that the landfill complies with Georgia Rule (n).

Condition 6.2.16 (Condition 6.2.15 in Permit 4953-089-0297-V-04-0) requires records of when LFG is directed to the flares or to the third-party treatment system.

Conditions 6.2.17 and 6.2.18 contains record keeping requirements for enhanced temperature monitoring for any LFG well that exceeds 145 degrees Fahrenheit. This is a new requirement from Subpart AAAA.

Several conditions from Permit 4953-089-0297-V-04-0 are not in this permit. Condition 6.1.8 required annual emissions reporting as required by Georgia Rule 391-3-1-.02(6)(a)4. Georgia Rule 391-3-1-.02(6)(a)4 has been removed from the Georgia Rules for Air Quality Control. Accordingly, Condition 6.1.8 is not included in the permit. The reporting requirements in Condition 6.2.6 have been incorporated into Condition 6.1.7. Condition 6.2.7 required a SSM plan. As noted earlier, the SSM plan is no longer required for landfills.

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

Permit 4953-089-0297-V-04-0 included Condition 7.6.1 which permitted the temporary activities of constructing landfill cells and capping (closure) of landfill cells. Because Hickory Ridge Landfill is entirely closed, these activities will not take place, and this condition is not included in this permit.

F. Compliance Schedule/Progress Reports

None Applicable

G. Emissions Trading

None Applicable

H. Acid Rain Requirements

None Applicable

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V permit. The facility has equipment that is subject to Title VI of the 1990 Clean Air Act Amendments.

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.//