

Facility Name: **Redbone Ridges MSW Landfill**
City: Ranger
County: Gordon
AIRS #: 04-13-129-00070

Application #: TV-609980
Date Application Received: November 24, 2021
Permit No: 4953-129-0070-V-05-0

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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: Redbone Ridges MSW Landfill

2. Parent/Holding Company Name

Gordon County Board of Commissioners

3. Previous and/or Other Name(s)

No previous names.

4. Facility Location

1224 Pleasant Hill Road Extension,
Ranger, GA 30734

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

Gordon County is designated attainment/unclassifiable for all criteria pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

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
4953-129-0070-V-04-0	May 26, 2017	Title V Permit Renewal
4953-129-0070-V-04-1	June 1, 2023	502(b)(10) Permit

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)

There are no products from this facility; the landfill receives and deposits solid waste into the landfill. There are no final products from this landfill.

3. Overall Facility Process Description

Redbone Ridges MSW Landfill receives and processes municipal and industrial solid waste. The solid waste is deposited into the landfill, compacted, and covered on a daily basis. The deposited waste undergoes anaerobic decomposition and generates landfill gas (LFG), consisting of about 55 percent methane and 45 percent carbon dioxide and a small amount of non-methane organic compounds (NMOC).

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 considered a minor source with respect to PSD rules.

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	n/a			
Individual HAP	yes			✓
Total HAPs	yes			✓

3. MACT Standards

The landfill is subject to 40 CFR Part 61 Subpart M - "Asbestos" because the landfill may dispose of asbestos-containing materials.

The Landfill MACT, 40 CFR 63 Subpart AAAA, 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. Redbone Ridges has a design capacity greater than or equal to 2.5 million Mg and 2.5 million m³ and the NMOC emission rate in 2020 was reported as 53.56 Mg/yr, therefore, the facility is now required to install a GCCS and thus is subject to the control requirements of Subpart OOO and Subpart AAAA.

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 60 Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills

The facility was previously subject to 40 CFR 60 Subpart WWW as Redbone Ridges MSW Landfill has a design capacity greater than 2.5 million cubic meters (m³), and the landfill has expanded after the effective date of May 30, 1991. The facility is no longer subject to 40 CFR 60 Subpart WWW because it is now subject to more stringent requirements under 40 CFR 62 Subpart OOO based on §60.750 below. The facility will also be subject to Georgia Rule (ggg) that implements Subpart Cf once the state plan is approved by EPA.

§60.750: Applicability, designation of affected Facility, and delegation of authority.

- (a) The provisions of this subpart apply to each municipal solid waste landfill that commenced construction, reconstruction, or modification on or after May 30, 1991, but before July 18, 2014.
- (d) An affected municipal solid waste landfill must continue to comply with this subpart until it:
 - 1) Becomes subject to the more stringent requirements in an approved and effective state or federal plan that implements subpart Cf of this part, or
 - 2) Modifies or reconstructs after July 17, 2014, and thus becomes subject to subpart XXX of this part.

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.

§62.16711: Designated facilities.

- (a) The designated Facility to which this subpart applies is each municipal solid waste landfill in each state, protectorate, and portion of Indian country that meets the conditions of paragraphs (a)(1) and (2) of this section, except for landfills exempted by paragraphs (b) and (c) of this section.
 - 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.
- (b) A municipal solid waste landfill regulated by an EPA-approved and currently effective state or tribal plan implementing 40 CFR 60, subpart Cf, is not subject to the requirements of this subpart.

Redbone Ridges MSW Landfill has a design capacity exceeding 2.5 million m³. The landfill is subject to Federal Plan OOO because it commenced construction before July 17, 2014, has not been modified

or reconstructed since May 2014, has accepted waste since November 8, 1987, and is not currently subject to an EPA-approved state plan. Once Georgia Rule (ggg) becomes an EPA-approved state plan, the landfill will no longer be subject to Federal Plan OOO.

Currently, the NMOC emission rate calculation using Tier 2 are above the Subpart OOO threshold of 34 Mg per year; a landfill gas collection and control system (GCCS) is required to be installed (Testing report from the Facility dated February 19, 2021 indicates that the NMOC emission rate is 53.56 megagrams per year for 2017). The facility will comply with the operational, compliance, monitoring, and reporting and recordkeeping requirements of 40 CFR 63 Subpart AAAA in lieu of the operational, compliance, monitoring, specific reporting, and recordkeeping requirements of 40 CFR 62 Subpart OOO, as sanction in this permit. The facility must comply with specific testing requirements of 40 CFR 62 Subpart OOO.

Since the calculated NMOC emission rate is equal to or greater than 34 Mg/yr, the owner must either submit a gas collection and control system design plan within 1 year as specified in § 62.16724(d) and install and operate a gas collection and control system within 30 months to 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 62.16718(a)(6). If the landfill is permanently closed, a closure report must be submitted as specified in 62.16724(f). If the 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.

40 CFR 61 Subpart M – NESHP for Asbestos

The facility is subject to 40 CFR 61 Subpart M, NESHP for Asbestos since the facility accepts asbestos-containing waste for disposal. As long as the facility remains active, it is 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 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 Part 82 Subpart F – Recycling and Emissions Reduction

The facility is subject to 40 CFR Part 82 Subpart F as it applies to any person maintaining, servicing, or repairing appliances containing class I, class II, or non-exempt substitute refrigerants.

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

40 CFR 63 Subpart AAAA applies to each landfill that received waste after November 6, 1987 that is a major source, is collocated with a major source, or is subject to the control requirements of Federal Operating Plan 40 CFR 62 Subpart OOO. The landfill is currently subject to this regulation because the landfill is now required by 40 CFR 62 Subpart OOO to install and operate a landfill gas collection and control system (GCCS). If the landfill begins adding liquids, other than leachate, in a controlled

fashion to the waste mass, it will trigger the Subpart AAAA provisions for a bioreactor. Since the facility is subject to Subpart AAAA, it is also subject to Subpart A, the NESHAP General Provisions.

The facility is also subject to the following Georgia Air Quality Rules:

Georgia Rule 391-3-1.02(2)(ggg) Existing Municipal Solid Waste Landfills

The provisions of this subparagraph 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 startup 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.

Georgia Rule 391-3-1.02(2)(n) Fugitive Emissions

This rule requires the facility to minimize fugitive dust from the facility. This includes using water or chemicals for controlling dust on construction operations, grading of roads, and the clearing of land; covering all times, when in motion, open bodied trucks transporting material likely to give rise to airborne dust; application of suitable material to dirt roads, materials, stockpiles, and other similar surfaces.

Georgia Rule 391-3-1.02(5) Open Burning

This regulation sets the requirements for open burning of vegetable matter that is generated from the site, defines the rules necessary for any ground clearing operations. This operation must still be conducted in accordance with any local regulations.

C. Compliance Status

The facility is operating in compliance with all rules or regulations.

D. Permit Conditions

Condition 2.2.1 has been modified to remove applicability of 40 CFR 60 Subpart A and Subpart WWW to the landfill and include applicability of 40 CFR 62 Subpart A and Subpart OOO.

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

Modified Condition 2.2.3 establishes the applicability of 40 CFR 63 Subpart A and Subpart AAAA to the landfill. The facility must comply with the requirements of the MACT by the date on which NMOC exceeds 50 Mg/yr or begins adding liquids such that the landfill becomes a bioreactor.

Condition 2.3.1 establishes applicability of Rule (ggg) once the state plan is approved by EPA.

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
1	Landfill	40 CFR 61 Subpart A 40 CFR 61 Subpart M 40 CFR 62 Subpart A 40 CFR 62 Subpart OOO 40 CFR 63 Subpart A 40 CFR 63 Subpart AAAA 391-3-1-.02(2)(ggg) 391-3-1-.02(2)(n)	None	None

* 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.

B. Equipment & Rule Applicability

Emission and Operating Caps:

No emission or operating caps apply.

Rules and Regulations Assessment:

The landfill is subject to 40 CFR 62 Subpart OOO since this municipal solid waste landfill commenced construction, reconstruction, or modification on or before July 17, 2014, and has accepted waste since November 8, 1987. This regulation establishes emission control requirements and compliance schedules for designated pollutants from certain designated municipal solid waste (MSW) landfills in accordance with section 111(d) of the Clean Air Act and subpart B of 40 CFR part 60. The Permittee is required to install a GCCS in accordance with the timelines of Subpart OOO if NMOC emission rate equals or exceeds 34 megagrams per year. The Permittee is exempt from the requirement to submit an annual NMOC emission rate report after a GCCS meeting the design criteria of 40 CFR 62 Subpart AAAA has been installed, during such time as the GCCS is in operation and in compliance with the applicable Subpart OOO and Subpart AAAA requirements.

The facility is subject to the Asbestos NESHAP because they can accept this type of waste at the landfill. The Asbestos NESHAP is a work practice standard that contains reporting and record keeping requirements. The NESHAP also denotes how areas that accept asbestos must be covered by the end of the day, and what kind of signage must be placed around the area.

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 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 dust suppressing material to dirt roads, material, stockpiles, and other similar sources.

C. Permit Conditions

Condition 3.3.1 establishes the bioreactor requirements regarding 40 CFR 63 Subpart AAAA should the facility become subject to this regulation.

New Condition 3.3.2 establishes the general control requirements for operating the GCCS as specified in §63.1958, in lieu of §62.16716.

Conditions 3.4.1 and 3.4.2 re-state the Georgia Rule (n) fugitive dust rule to ensure the landfill operators understand that they must take all reasonable precautions when moving dirt. Condition 3.4.1c has been modified to update verbiage.

Condition 3.4.2 also establishes the Georgia Rule (n) 20 percent opacity limit for fugitive dust.

New Condition 3.4.3 limits the opacity of visible emissions from the new flare to less than 40 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.

Condition 4.1.3 has been modified to remove Method 9 determination for visible emissions from stationary sources pursuant to §60.11(b) and include Method 21 for surface emission monitoring as specified in § 62.16720(c)).

B. Specific Testing Requirements

Conditions 4.2.1 through 4.2.3 have been modified to remove the requirements from Subpart WWW and include the requirements from Subpart OOO for determining the site-specific Non-Methane Organic Compounds (NMOC) concentration.

New Condition 4.2.4 states the sampling procedures to be followed for collecting samples to determine NMOC concentration when using Tier 2 or Tier 3 values for calculating NMOC emissions.

New Condition 4.2.5 provides the equation for calculating NMOC emission rate following the GCCS installation and startup.

New Condition 4.2.6 details the procedures for conducting the surface methane measurements using tier 4 testing, only if both Tier 1 and Tier 2 indicate NMOC emissions are greater than or equal to 34 Mg/yr but less than 50 Mg/yr.

New Condition 4.2.7 applies to the gas collection from this landfill and states the emission standards for the control system.

New Condition 4.2.8 prohibits Redbone Ridges from removing its GCCS or the control devices until the landfill ceases to accept waste (closes), the GCCS has been in operation at least 15 years, and the NMOC emission rate falls below 50 megagrams per year. The exact procedures for demonstrating that the NMOC emission rate has fallen to a sufficiently low level are found in 40 CFR 62.16718(b).

New Condition 4.2.9 requires an initial performance test for visible emissions no later than 180 days after the startup of the new flare.

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

New Condition 5.2.1 requires sampling or access ports on each wellhead in order to perform required monthly wellhead monitoring.

New Condition 5.2.2 requires monthly monitoring and recording of the gas pressure in each GCCS wellhead to ensure that the pressure is negative. This does not apply to wellheads that are attached only to passive flares because passive flares, by nature, operate under positive pressure. Excessive pressure must be reported as an exceedance per Condition 6.1.7.

New Condition 5.2.3 details the procedures (per Subpart AAAA, in lieu of Subpart OOO) that must be followed if the GCCS wellhead gas pressure is not negative.

New Condition 5.2.4 requires monthly monitoring and recording of each GCCS wellhead temperature and nitrogen or oxygen level. Excessive temperature levels must be reported as an exceedance per Condition 6.1.7.

New Condition 5.2.5 details the procedures (per Subpart AAAA, in lieu of Subpart OOO) that must be followed if the GCCS wellhead gas temperature exceeds the allowable values.

New Condition 5.2.6 requires quarterly surface methane concentration monitoring on the landfill and describes the procedures that must be followed if any methane concentrations exceed the allowable values. Excessive methane concentrations must be reported as an exceedance per Condition 6.1.7.

New Condition 5.2.7 details the method for conducting the surface methane concentration monitoring.

New Condition 5.2.8 requires the landfill to develop a program for monthly inspections of the landfill cover integrity, and to keep a record of the inspection findings.

New Condition 5.2.9 requires the Permittee continuously monitor the new flare in accordance with 40 CFR 63 Subpart AAAA and 40 CFR 62 Subpart OOO.

New Condition 5.2.10 requires the Permittee to convey LFG to the flare through the collection header pipe(s) to comply with 40 CFR 62.16714(c)(1).

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.

Conditions 6.1.1 through 6.1.6 specify the general recordkeeping and reporting requirements.

Modified Condition 6.1.7 details the excess emissions, exceedances, excursions, and other information that must be reported for each period.

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). Since NMOC emissions exceed 34 megagrams per year, the landfill must submit a Collection and Control System (GCCS) Design Plan that has been prepared by a Professional Engineer. Subpart OOO and Subpart AAAA 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.

Modified Conditions 6.2.1 through 6.2.4 state the reporting, recordkeeping, procedures, and options for the Permittee to calculate the non-methane organic compound (NMOC) emissions rate annually according to the Tier 3 and Tier 4 testing procedure specified in 40 CFR 62.16724 “Test Methods and Procedures.” Condition 6.2.3 elaborates further requirements for the GCCS design plan.

Modified Condition 6.2.5, which requires the facility to keep records of the maximum design capacity, the current amount of waste in place, and the yearly waste acceptance rates in accordance with 40 CFR 62 Subpart OOO.

New Conditions 6.2.6 and 6.2.7 state the record keeping requirements (per Subpart AAAA, in lieu of Subpart OOO) for root cause analysis to be in accordance with Condition 5.2.3.

Old Conditions 6.2.6 and 6.2.7 become New Conditions 6.2.8 and 6.2.9, which require facilities that have received asbestos-containing waste to comply with the requirements of 40 CFR 61 Subpart M.

Old Conditions 6.2.8 and 6.2.9 become New Conditions 6.2.10 and 6.2.11, which state the recordkeeping requirements for the facility areas to remain excluded from the requirements of a 40 CFR 62 Subpart OOO GCCS.

Old Condition 6.2.10 becomes New Condition 6.2.12, which requires the Permittee to implement the existing Dust Suppression Plan 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 6.1.7.

Old Conditions 6.2.11 through 6.2.13 becomes New Conditions 6.2.13 through Condition 6.2.15, which contain reporting and recordkeeping requirements (per Subpart AAAA, in lieu of Subpart OOO) specifying that the Landfill keep calculations of the waste mass moisture content if liquids, other than leachate, are added to the landfill. These calculations are used to demonstrate that the Landfill is not a bioreactor. If so, it would be subject to the bioreactor control requirements of Subpart AAAA and must follow the recordkeeping requirements (per Subpart AAAA, in lieu of Subpart OOO) in Condition 6.2.15.

New Condition 6.2.16 requires the Permittee keep records of GCCS exceedances per Subpart AAAA, in lieu of Subpart OOO.

Old Condition 6.2.14 becomes New Condition 6.2.17, which has been modified to require the Permittee to submit a Landfill Closure Report after it ceases to accept waste in accordance with 40 CFR 62 Subpart OOO.

New Condition 6.2.18 requires the Permittee keep records of the monitored equipment operating procedures pursuant to §62.16726.

New Condition 6.2.19 requires the Permittee submit a removal report to the division 30 days prior to the removal or cessation of the GCCS.

New Condition 6.2.20 requires the Permittee keep records of the landfill gas control equipment as specified in §62.16726.

New Condition 6.2.21 requires the Permittee keep records of the life of the collection system and an accessible plot map showing each collector.

New Condition 6.2.22 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.

New Condition 6.2.23 requires the Facility to keep records should the Permittee be required to report per Permit Condition 6.2.22.

New Condition 6.2.24 set requirements should the Permittee 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.

New Condition 6.2.25 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.

New Condition 6.2.26 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.

New Condition 6.2.27 requires the Permittee submit reports specified in Condition 6.2.23 or 6.2.25, along with all subsequent reports, to EPA via the CEDRI by the deadlines specified in this permit, regardless of the method.

New Condition 6.2.28 requires the Facility to notify the Division when there is any increase in the design capacity of the landfill.

New Condition 6.2.29 contains the reporting requirements, per Subpart AAAA, for all monitoring activities required by Conditions 5.2.1, 5.2.4, and 5.2.5.

New Condition 6.2.30 contains the reporting requirements, per Subpart AAAA, for submitting a 24-hour high temperature report in the event a landfill gas temperature measured at either the wellhead or at any point in the well exceeds 76.7 degrees Celsius (170 degrees Fahrenheit) and the measured CO concentration equals or exceeds 1,000 ppmv.

New Condition 6.2.31 contains the corresponding timeline for submitting information regarding corrective actions, per Subpart AAAA.

New Condition 6.2.32 requires the Permittee notify the Division within 15 days after installing the new flare.

New Condition 6.2.33 requires the Permittee to submit an initial performance test report for the new flare per 40 CFR 62.16724.

New Condition 6.2.34 requires the Permittee keep records, for the life of the new flare, of any performance test results from initial performance testing conducted per Condition 4.2.9 and performance testing subsequently after.

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

- 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

Redbone Ridges landfill has air conditioners or refrigeration equipment that uses CFC's, HFC's, or other stratospheric ozone depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B. The facility is also subject to 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction.

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.