

Facility Name: **Camden County SR 110 MSW Landfill**
City: Woodbine
County: Camden
AIRS #: 04-13-039-00027

Application #: TV-622818
Date Application Received: January 11, 2022
Permit No: 4953-039-0027-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:**

Camden County SR 110 MSW Landfill

2. Parent/Holding Company Name

Camden County Board of Commissioners

3. Previous and/or Other Name(s)

SR 110 MSW Landfill
Camden County Solid Waste Department

4. Facility Location

5395 Highway 110,
Woodbine, GA 31569

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

Camden County is a considered an attainment area for all criteria pollutants.

B. Site Determination

Camden County SR 110 MSW Landfill at the site location above serves as a disposal site for municipal solid wastes. The County's website describes another county Landfill as providing for the disposal of construction, demolition, and industrial waste (CD&IW). The address given for the latter Landfill is 1600 Highway 110, Woodbine, GA 31569. The MSW site is 202 acres with 56 acres permitted for solid waste disposal. The CD&IW site is 1,178 acres with 294 acres permitted to receive waste.

According to Google maps, these addresses for the Landfills are located about 128 feet (43 yards) apart. Both Landfills fall under SIC code 4953. The MSW Landfill has been in operation since 1992 and the CD&IW Landfill since 2003.

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
4953-039-0027-V-04-0	August 3, 2017	Title V Renewal

D. Process Description

1. SIC Codes(s)

4953

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this Facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

This facility operates landfill disposal cells where municipal solid wastes are permanently disposed.

3. Overall Facility Process Description

Camden County SR 110 MSW Landfill is a municipal solid waste landfill that processes general waste. It consists of Landfill disposal cells where municipal solid wastes are permanently disposed. Disposal produces leachate collected from the floor of the disposal cell and landfill gas emissions from biological activity within the disposed waste. Landfill gas is emitted through the daily, intermediate and/or final cap of the landfill. Landfill gas is comprised mainly of methane and carbon dioxide but contains trace organic compounds including hazardous air pollutants and volatile organic compounds.

The MSW landfill receives waste from the Camden County and other surrounding counties in Georgia and Northeast Florida. Wastes are received and disposed in lined landfill cells that meet the minimum requirements of Subtitle D of the Resource Conservation and Recovery Act as amended.

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 non-major under PSD/NSR regulations.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	n/a			
VOC	✓			✓
NO _x	n/a			
CO	✓			✓
TRS	n/a			
H ₂ S	n/a			
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The Landfill MACT, 40 CFR 63 Subpart AAAAA, is applicable to each area source MSW Landfill with a design capacity greater than or equal to 2.5 million Mg and 2.5 million m³ and that has estimated uncontrolled NMOC emissions exceeding 50 Mg/yr. The MACT standard is not currently applicable to this Landfill because the NMOC emissions are less than 50 megagrams per year and this landfill does not act as a bioreactor.

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	y
Program Code M – Part 63 NESHAP	n

Program Code V – Title V	y
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Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

40 CFR 63 Subpart AAAA – *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills* promulgates that the MACT is applicable to each area source MSW Landfill with a design capacity greater than or equal to 2.5 million Mg and 2.5 million m³ and an estimated uncontrolled NMOC emission rate exceeding 50 Mg/yr. This rule is not applicable to this Facility since the calculated NMOC emission rate is less than 50 megagrams per year. However, the landfill has been identified as potentially subject to 40 CFR 63 Subpart AAAA, as this rule also regulates bioreactors that are above the capacity threshold but below the NMOC emissions rate threshold. In case the facility starts adding liquids, other than leachate, in a controlled fashion to the waste mass, the Permittee will be required to abide by the various provisions of Subpart AAAA, for a bioreactor.

40 CFR 60 Subpart WWW – *Standards of Performance for Municipal Solid Waste Landfills* applies to landfills that commenced construction, reconstruction, or modification on or after May 30, 1991, but before July 18, 2014. Camden County MSW Landfill will no longer be subject to 40 CFR 60 Subpart WWW because it will be now subject to more stringent requirements of 40 CFR 62 Subpart OOO and will be subject to Georgia Rule (ggg) that implements 40 CFR 60 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* was promulgated June 21, 2021. This Federal Operating Plan 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). Camden County Landfill has a design capacity exceeding 2.5 million m³ and commenced construction before July 17, 2014, has not been modified or reconstructed since 1992, has accepted waste since November 8, 1987, and is not 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.

On April 21, 2014, testing was done to determine the site-specific NMOC emission rate using Tier 2 procedures, which the results determined the NMOC emission rate to be 5.04 Mg/yr for the year 2013. Tier 2 testing was reconducted from April 8, 2019 to April 10, 2019 to redetermine the site-specific NMOC emission rate. Per the summary report dated May 8, 2019, the NMOC emission rate was determined to be 9.2 Mg/yr for the year 2018. Currently, the NMOC emission rate calculation using Tier 2 remains below the Subpart OOO threshold of 34 Mg per year; a landfill gas collection and control system (GCCS) is not required to be installed at this time. The next deadline for retesting the site-specific NMOC concentration is May 2024.

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

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

The Landfill is subject to 40 CFR Part 61, Subpart M, NESHAP for Asbestos because the facility accepts asbestos-containing waste for disposal. The facility is required to comply with the provision 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”*.

C. Compliance Status

The facility’s application did not indicate any issues of non-compliance.

D. Permit Conditions

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

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

Condition 2.2.3 establishes the potential applicability of 40 CFR 63 subpart A and Subpart AAAA to the landfill with the requirements of the NESHAP if the facility is required to install a GCCS.

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
LF-1	MSW 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)(n) 391-3-1-.02(2)(ggg)*** 391-3-1-.02(5)	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.

** 40 CFR Part 63 requirements are not currently applicable but could become applicable during the permit term if the facility is required to install a GCCS or becomes a bioreactor.

*** Georgia Rule 391-3-1.02(2)(ggg) requirements are not currently applicable to the facility, but could become applicable during the permit term once Rule is approved.

B. Equipment & Rule Applicability

Emission and Operating Caps: The facility has never been and still is not subject to any emission or operating caps.

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 17, 2014: 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, it is subject to 40 CFR 62 Subpart OOO. 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 or 5-year NMOC emission rate report after a GCCS meeting the design criteria of 40 CFR 62 Subpart OOO has been installed, during such time as the GCCS is in operation and in compliance with the applicable Subpart OOO requirements.

40 CFR 61 Subpart M – National Emission Standards for Asbestos: The facility is subject to the Asbestos NESHAP because they accept asbestos-containing 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 in and around the area.

Georgia Rule 391-3-1-.02(2)(n): Rule (n) for fugitive emissions requires the facility to minimize fugitive dust from the facility. This includes using water or chemicals to control 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 fugitive airborne dust; applying suitable material on dirt roads, materials, stockpiles, and other similar surfaces which can give rise to airborne dust; and limiting fugitive dust to a 20% opacity.

Georgia Rule 391-3-1-.02(5): This regulation sets forth the requirements for open burning of vegetable matter that is generated from the site and defines the rules necessary for any ground clearing operations by means of air curtain destructor. This operation must still be conducted in accordance with any local regulations.

C. Permit Conditions

Condition 3.3.1 requires the Permittee to comply with bioreactor requirements per 40 CFR 63 Subpart AAAA should any liquid be added in a controlled fashion other than leachate.

Conditions 3.4.1 and 3.4.2 reiterate Georgia Rule (n) for fugitive dust to ensure that the Landfill operators understand they must take all reasonable precautions when moving dirt to limit the amount of fugitive emissions.

Condition 3.4.3 establishes Georgia Rule (5) for Open Burning and sets forth ground clearing regulations.

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.c has been modified to remove compliance with Method 9 for the visual determination of opacity required by §60.11 and include Method 21 for surface emission monitoring.

B. Specific Testing Requirements

Camden County SR 110 MSW Landfill is uncontrolled and is subject to 40 CFR 62 Subpart OOO. Both this permit and Subpart OOO contain specific testing requirements to determine NMOC emissions rate for an uncontrolled landfill. Conditions No. 4.2.1 through 4.2.7 provide the requirements and appropriate equation for calculating NMOC emissions.

Condition 4.2.1 states that the Facility must determine the NMOC emission rate using the equations in Permit Condition 4.2.2 and constants in Permit Condition 4.2.3.

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.

Condition 4.2.5 requires the Facility to conduct testing to determine the site-specific NMOC concentration using the procedures specified in Condition 4.2.4 no later than May 2024.

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 contains instrumentation specifications and procedures for surface emission monitoring devices.

The calculated NMOC emission rate for the year 2013, based on Tier 2, was 5.04 Mg/yr which does not exceed the 34 Mg/year threshold. The latest report dated May 8, 2019, calculates the NMOC emission rate for the year 2018 as 8.72 Mg/yr which is still well below the threshold. Therefore, the facility is not required to submit a Gas Collection and Control System (GCCS) plan at this time but must continue to submit annual emission rate estimates. If any annual emission rate estimate, based on Tier 2, submitted to the Division is greater than or equal to 34 Mg per year, a GCCS plan is required to be submitted, unless the landfill chooses to recalculate the emission rate using Tier 3.

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

None Applicable.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

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

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

Condition 6.2.1 requires the submittal of an annual NMOC emission rate estimate for the landfill, per Subpart OOO. Once the estimated NMOC emission rate exceeds 34 Mg/yr, the facility is required to submit a GCCS plan within one year or recalculate the NMOC emission rate using the specified procedures. This condition has been modified to implement Subpart OOO and clear up verbiage.

Modified Condition 6.2.2 requires the Permittee, if beginning to calculate NMOCs according to Tier 3, to submit a revised Tier 3 NMOC emission rate report within one year of the first calculated Tier 2 emission rate exceeding 34 megagrams per year.

Modified Condition 6.2.3 requires the Permittee to install a GCCS if the NMOC emission rate is equal to or greater than 34 megagrams per year and the facility chooses not to recalculate the NMOC emission rate using a higher Tier calculation method.

Modified Condition 6.2.4 states that the requirement of Condition 6.2.1, to submit an annual NMOC emission rate estimate, is no longer applicable after an approved GCCS has been installed.

Condition 6.2.5 requires that the landfill keep records of the design capacity report, current waste-in-place, and year-by-year waste acceptance rate, per Subpart OOO. This condition has been modified to match current 40 CFR 62.16726 verbiage.

Condition 6.2.6 requires that the landfill satisfy the reporting and record keeping requirements in regard to Subpart M.

Condition 6.2.7 requires the submission of records to the Administrator of the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) program upon closure of the facility.

Condition 6.2.8 contains requirements for excluding areas of the landfill from the GCCS design when it is required, which contain nondegradable waste. The regulation in which this condition derived from has been modified.

Modified Condition 6.2.9 authorizes the Permittee to exclude any nonproductive area of the landfill from being part of a required 40 CFR 62 Subpart OOO GCCS, provided it contributes less than 1 percent of the total amount of NMOC emissions from the landfill.

Condition 6.2.10 requires the Permittee to implement the existing Dust Suppression Plan to assure compliance with Georgia Air Quality Rule (n) for fugitive dust.

Condition 6.2.11 requires that the landfill 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.

Condition 6.2.12 requires that the landfill keep calculations of the waste mass moisture content if the landfill adds liquids other than leachate to the landfill. These calculations are to demonstrate that the landfill is not a bioreactor. If it was, it would be subject to the bioreactor control requirements of Subpart AAAA. The requirement, in the condition, to update the calculations quarterly was added by EPD since Subpart AAAA did not provide guidance on how often this should be updated.

Condition 6.2.13 requires that the landfill notify the Division if the moisture content of the waste mass exceeds 40 percent by weight. If the moisture content exceeds 40 percent, the landfill becomes subject to the bioreactor requirements of Subpart AAAA.

Condition 6.2.14 requires that the landfill submit a closure report within 30 days of waste acceptance cessation, per Subpart OOO. The regulation in which this condition derived from has been modified.

New Permit Condition 6.2.15 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 Permit Condition 6.2.16 requires the facility to keep records should the Permittee be required to report per Permit Condition 6.2.15.

New Permit Condition 6.2.17 allows the Permittee to elect Tier 4 testing to comply with specific surface methane emissions if the NMOC emission rate report submitted in compliance with 6.2.1 is greater than or equal to 34 megagrams per year but less than 50 megagrams per year.

New Permit Condition 6.2.18 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 Permit Condition 6.2.19 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 Permit Condition 6.2.20 requires the Permittee submit reports specified in Condition 6.2.15 or 6.2.17, along with all subsequent reports, to EPA via the CEDRI by the deadlines specified in this permit, regardless of the method.

New Condition 6.2.21 requires the facility to submit in writing an amended design capacity report when there is any increase in the design capacity of a landfill. Old Condition 6.2.15 becomes New Condition 6.2.21.

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

- The 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.

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.