

Facility Name: Superior Landfill and Recycling Center
City: Savannah
County: Chatham
AIRS #: 04-13-051-0205

Application #: TV-636243
Date Application Received: March 17, 2022
Permit No: 4953-051-0205-V-04-0

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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:

Superior Landfill and Recycling Center

2. Parent/Holding Company Name

Waste Management of Georgia, Inc.

3. Previous and/or Other Name(s)

None

4. Facility Location

3001 Little Neck Road
Savannah, Georgia 31419

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

The landfill is located in Chatham County, which is in attainment for all criteria pollutants.

B. Site Determination

Superior Landfill consists of two adjacent sites. Site 1 was constructed in 1983 and closed in 1995. Site 2 was constructed in 1993 and is still in operation. The two sites comprise one landfill for the purposes of Title V and NSPS Subpart XXX.

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
4953-0051-0205-V-03-0	Sep 19, 2017	Title V renewal
4953-0051-0205-V-03-1	March 11, 2019	502(b)10 amendment: flare replacement

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)

Superior Landfill and Recycling Center receives, manages, and disposes of solid and liquid waste. The facility has a GCCS (Gas Collection and Control System) to extract LFG (landfill gas). The extracted LFG is conveyed to the existing landfill gas to energy facility (LFGTE) and/or the utility flare for combustion. The LFGTE facility consists of a LFG treatment system and eight LFG-fired internal combustion engines used to generate electricity.

3. Overall Facility Process Description

The Superior Landfill and Recycling Center receives, manages, and disposes of solid waste in accordance with its solid waste permit. The waste is deposited directly into the landfill and covered with fill soil or other approved alternate daily cover (ADC). Landfill gas (LFG) is produced from the decomposition of the deposited waste. The LFG is collected in a gas collection and control system (GCCS). The collected gas is sent to either an open flare or a landfill gas to energy (LFGTE) facility. The LFGTE facility consists of an LFG treatment system and eight LFG-fired internal combustion engines used to generate electricity.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Superior Landfill is a major source under the PSD regulations. Potential emission of carbon monoxide (CO), nitrogen oxides (NO_x), and sulfur dioxide (SO₂) exceed the 250 tons per year (tpy) PSD major source threshold. Potential emissions of all other pollutants are below 250 tpy.

The landfill is not one of the 28 listed source categories that have a 100 tpy PSD major source threshold.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

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

3. MACT Standards

The Landfill MACT, 40 CFR 63 Subpart AAAA, is applicable to each area source municipal solid waste landfill with a design capacity greater than or equal to 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) and having an estimated uncontrolled NMOC emission exceeding 50 megagrams per year (Mg/yr) or if the landfill is a bioreactor. This landfill has uncontrolled NMOC emissions greater than 50 Mg/yr and a design capacity greater than 2.5 million Mg. Therefore, this MACT standard is applicable to the landfill.

The facility is subject to 40 CFR 63 Subpart ZZZZ – “National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines” for operation of the internal combustion engines.

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	Yes
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 XXX – Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014

This rule applies to each municipal solid waste landfill that has a design capacity greater than 2.5 million Mg and 2.5 million m³ and has estimated uncontrolled NMOC emissions equal to or greater than 34 megagram per year (Mg/yr) and if the landfill commenced construction, reconstruction, or modification after July 17, 2014. Superior Landfill is subject to this rule because the facility was issued a solid waste permit modification for a landfill expansion after July 17, 2014. This landfill was formerly subject to 40 CFR 60 Subpart WWW, but it is currently subject to 40 CFR 60 Subpart XXX. Because the NMOC emissions from Superior Landfill and Recycling Center exceeded the annual emission rate limit, the landfill has installed a gas collection and control system.

40 CFR 61 Subpart M – NESHAP for Asbestos

Superior Landfill accepts asbestos-containing waste and is, therefore, subject to 40 CFR 61 Subpart M. As long as the MSW landfill remains active, it is required to comply with the provisions of 40 CFR 61.514 – “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 63 Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

This rule applies to each landfill that received waste after November 8, 1987 and is a major source, is collocated with a major source, or has a design capacity equal to or greater than 2.5 million Mg and 2.5 million m³ and has estimated uncontrolled NMOC emissions equal to or greater than 50 megagram per year (Mg/yr). Superior Landfill is subject to this rule because it is an area source landfill with a design capacity greater than 2.5 million Mg and 2.5 million m³ and an estimated uncontrolled NMOC emission rate greater than 50 Mg/yr.

C. Compliance Status

There are no non-compliance issues at the facility.

D. Permit Conditions

Condition 2.2.1 establishes the applicability of 40 CFR 60 Subparts A and XXX to the landfill. This condition replaced the applicability of 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.

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	40 CFR 60 Subpart A 40 CFR 60 Subpart XXX 40 CFR 61 Subpart A 40 CFR 61 Subpart M 40 CFR 63 Subpart A 40 CFR 63 Subpart AAAA 391-3-1-.02(2)(n)	GCCS TS F2	Landfill Gas Collection and Control System (GCCS); Landfill Gas Treatment System; Open Flare
E1	Caterpillar 3516 Internal Combustion Engine No.1	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
E2	Caterpillar 3516 Internal Combustion Engine No.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
E3	Caterpillar 3516 Internal Combustion Engine No.3	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
E4	Caterpillar 3516 Internal Combustion Engine No.4	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
E5	Caterpillar 3516 Internal Combustion Engine No.5	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
E6	Caterpillar 3516 Internal Combustion Engine No.6	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
E7	Caterpillar 3516 Internal Combustion Engine No.7	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None
E8	Caterpillar 3516 Internal Combustion Engine No.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None

B. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

40 CFR 60 Subpart XXX – “Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014”

Since this landfill was modified after the 40 CFR 60 Subpart XXX effective date (July 17, 2014) and it has a design capacity greater than 2.5 million cubic meters (3.2 million cubic yards), it is subject to the New Source Performance Standards (NSPS) 40 CFR 60, Subpart XXX. This rule required the installation of a gas collection and control system (GCCS). Landfill gases collected by the GCCS are routed to either a landfill gas treatment system for subsequent combustion in one of eight engines or an open flare operated in accordance with 40 CFR 60.18.

40 CFR 60 Subpart JJJJ – “Standards of Performance for Stationary Spark Ignition Internal Combustion Engines” and 40 CFR 63 Subpart ZZZZ – “National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines”

The eight landfill gas-fired internal combustion (IC) engines are potentially subject to 40 CFR 60 Subpart JJJJ (NSPS for spark ignition engines) and 40 CFR 63 Subpart ZZZZ (RICE MACT). The engines at this landfill are 1,148 horsepower natural gas-fired (equivalent) lean burn engines. Lean burn landfill gas-fired engines with a maximum engine power between 500 and 1,350 HP are subject to the NSPS if the owner commenced construction after June 12, 2006 and the manufacture date of the engine is January 1, 2008 or later. At an area source of HAPs, these engines are new if they were manufactured after June 12, 2006 and existing if they were manufactured before this date. The manufacture date for these engines is:

Engine	Manufactured Date	Subject to NSPS	MACT Status
E1	5/22/2007	No	New
E2	5/22/2007	No	New
E3	7/18/2006	No	New
E4	4/17/2007	No	New
E5	6/14/2007	No	New
E6	4/13/2007	No	New
E7	6/14/2007	No	New
E8	4/11/2007	No	New

New engines at an area source of HAPs comply with the RICE MACT by complying with the NSPS. Because Engines E1, E2, E3, E4, E5, E6, E7, and E8 are not subject to the NSPS, no requirements under the MACT or NSPS apply.

Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions

Rule (b) requires that visible emissions from an air contaminant source be limited to a maximum opacity of 40 percent. This standard is applicable to sources subject to some other emission limitation under section 391-3-1-.02. Since the engines in the landfill gas to energy plant is subject to Rule (g), the visible emission standard in this rule are applicable to each engine.

Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide

Rule (g) specifies the maximum sulfur content in fuels used for combustion. Paragraph 2 of this rule limits the maximum sulfur content to 2.5 percent (by weight) in all fuels fired in a combustion source below 100 million Btu per hour heat input rate. The heat input capacity for each engine is 9.11 million Btu per hour. As such, the landfill gas may not contain more than 2.5 percent sulfur by weight.

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 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

Condition 3.3.1 details the general operating requirements for the GCCS found in 40 CFR 63 Subpart AAAA. Includes standards for wellhead pressure, wellhead temperature, methane concentration, and operation of flare and LFG treatment system. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 3.3.2 requires that the open flares be designed and operated in accordance with 40 CFR 63.11, per 40 CFR Subpart AAAA. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 3.3.3 contains the bioreactor requirements from 40 CFR 63 Subpart AAAA if liquid (other than leachate) is added to the landfill in a controlled fashion. (Same as Condition 3.3.4 in existing permit. Condition 3.3.3 in existing permit no longer applicable).

Condition 3.3.4 specifies the general applicability of 40 CFR 63 Subpart A and ZZZZ to the engines. (Same as Condition 3.3.5 in existing permit),

Condition 3.3.5 limits the NO_x and CO emissions from the engines to ensure the landfill remains a minor source for PSD purposes. (Same as Condition 3.3.6 in existing permit)

Condition 3.4.1 limit the opacity from the engines and any other emission source at the facility, in accordance with Rule (b). (Same as Condition 3.4.4 in existing permit)

Condition 3.4.2 limits the fuel sulfur content, in accordance with Rule (g). (Same as Condition 3.4.3 in existing permit)

Condition 3.4.3 and 3.4.4 limit fugitive dust and its opacity, in accordance with Rule (n). (Same as Condition 3.4.1 and 3.4.2 in existing permit).

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

Condition 4.2.1 specifies the initial test requirements for open flares. (Similar to existing, updated to 40 CFR 63 Subpart AAAAA).

Condition 4.2.2 specifies the requirements the landfill must be met in order to remove its GCCS or control devices. (Similar to existing, updated to 40 CFR 63 Subpart AAAAA).

Condition 4.2.3 requires the Permittee to conduct CO and NO_x emission testing to demonstrate compliance with the emission limits whenever an IC engine is rebuilt or swapped out (like-for-like). (Same in existing permit).

Condition 4.2.4 contains the equations to determine NO_x emissions in Condition 3.3.5 and as required by Condition 5.2.16. (New to permit.)

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 landfill is subject to 40 CFR 60 Subpart XXX and 63 Subpart AAAA.

Condition 5.2.1 contains the requirement to install a sampling port and temperature measuring device or an access port for measurements. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 5.2.2 contains the requirement to measure and record gauge pressure at each wellhead. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 5.2.3 outlines the schedule if an exceedance of gauge pressure occurs. (New to permit. Updated to 40 CFR 63 Subpart AAAA).

Condition 5.2.4 contains the requirement to measure and record oxygen or nitrogen concentration at each wellhead. (Similar to existing, updated to 40 CFR 63 Subpart AAAA. Condition 5.2.6 no longer applicable).

Condition 5.2.5 contains the requirement to measure and record temperature at each wellhead. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 5.2.6 outlines the schedule if an exceedance of temperature occurs. (New to permit).

Condition 5.2.7 details the process of enhanced monitoring for wellhead temperature. (New to permit).

Condition 5.2.8 details the annual wellhead temperature monitoring in the case of temperatures higher than 73.9 degrees Celsius. (New to permit).

Condition 5.2.9 requires the facility to install and maintain a heat sensing device for the flame and a flow device to the flare. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 5.2.10 requires the monitoring of LFG treatment system. (New to permit).

Condition 5.2.11 requires the monitoring of methane and details the schedule in the case of an exceedance (Similar to Condition 5.2.7 through 5.2.8, updated to 40 CFR 63 Subpart AAAA).

Condition 5.2.12 details the specifications for surface methane monitoring (New to permit).

Condition 5.2.13 enforces the monitoring requirements to apply at all times. (New to permit).

Condition 5.2.14 contains the requirement to monitor cover integrity. (Same as Condition 5.2.9 in existing permit, updated to 40 CFR 63 Subpart AAAAA).

Condition 5.2.15 contain the requirement to monitor manifold temperature, pressure, ignition timing, and engine load for the IC engines. (Similar to Condition 5.2.1 in existing permit. Only includes the engines).

Condition 5.2.16 prescribes the monitoring frequency for the IC engines. (Same as Condition 5.2.10 in existing permit).

Condition 5.2.17 requires the NO_x and CO emissions from one engine to be verified each year. The engine to be verified rotates to a new engine each year. (Same as Condition 5.2.11 in existing permit).

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 [quarterly or semiannual] basis.

B. Specific Record Keeping and Reporting Requirements

Superior Landfill and Recycling Center is subject to 40 CFR 60 Subpart XXX 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. The landfill is required to comply with 40 CFR 61.154 and, upon closure, submit records of asbestos disposal locations and quantities. The landfill is also subject to 40 CFR 63 Subpart AAAA.

Condition 6.1.7 specifies the excess emissions of NO_x as limited by Condition 3.3.5; exceedances of wellhead temperature and temperature, surface methane concentration, and when the open flares and/or landfill gas treatment system are not operating; and excursions.

The requirements in Section 6.2 of the previous permit have been carried over to this permit. The conditions have been updated to the most recent version of the conditions, the order of the conditions have been revised, and the conditions have been updated to the regulatory requirements of 40 CFR 63 Subpart AAAA.

Condition 6.1.8 allows the exceedances in the operational requirements of the GCCS not to be deviations if corrective actions are taken, per 40 CFR 63 Subpart AAAA.

Condition 6.2.1 requires a closure report when the landfill stops accepting waste in order to close the landfill. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 6.2.2 requires an equipment removal report when the landfill removes or ceases to operate control equipment. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 6.2.3 details the items to be reported in the semi-annual report. (New to permit).

Condition 6.2.4 requires a report when a required GCCS corrective actions take longer than prescribed in 40 CFR 63 Subpart AAAA. (New to permit).

Condition 6.2.5 requires reporting of when temperature is equal to or greater than 76.7 degrees Celsius. (New to permit).

Condition 6.2.6 and 6.2.7 requires records of calculations whenever liquids other than leachate is added. (Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 6.2.8 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. (Same as Condition 6.2.3, updated to 40 CFR 63 Subpart AAAA).

Condition 6.2.9 requires records of the GCCS components. (Same as Condition 6.2.4, updated to 40 CFR 63 Subpart AAAA).

Condition 6.2.10 requires records of operating parameters. (New to permit).

Condition 6.2.11 requires records of existing and planned collectors in the GCCS. (Same as Condition 6.2.5, Similar to existing, updated to 40 CFR 63 Subpart AAAA).

Condition 6.2.12 requires records of GCCS exceedances. (New to permit. Condition 6.2.6 in existing permit is no longer applicable.)

Condition 6.2.13 requires records of the GCCS monitoring data parameters. (New to permit)

Condition 6.2.14 requires records of monthly temperature measurements and records of enhanced monitoring. (New to permit).

Conditions 6.2.15 and 6.2.16 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. (Same as Condition 6.2.7 and 6.2.8 in existing permit, updated to 40 CFR 63 Subpart AAAA).

Conditions 6.2.17 and 6.2.18 contain requirements from 40 CFR 61 Subpart M which are applicable if the landfill accepts asbestos-containing waste. (Same as Condition 6.2.9 and 6.2.10 in existing permit).

Condition 6.2.19 requires a Liquids Addition Report is the Permittee has added leachate or other liquids based on a Research, Development, and Demonstration permit. (New to permit).

Condition 6.2.20 requires implementing their dust suppression plan to ensure that the landfill complies with Georgia Rule (n). (Same as Condition 6.2.15 in existing permit).

Condition 6.2.21 requires notification whenever liquids, other than leachate is added to the landfill (Same as Condition 6.2.16 in existing permit).

Condition 6.2.22 requires the notification whenever the landfill is expanded. (New to permit).

Condition 6.2.20 requires the landfill to record the date and length of downtime of each IC engine. (Same as Condition 6.2.19 in existing permit).

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

- in the narrative refer to form D.5, Short-Term Activities, of the Title V permit application highlight unusual issues

Condition 7.6.1 requires records of duration and frequency of the construction or closure of landfill cells, wood chipping, and concrete crushing. (Same as existing permit).

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

The facility does not have air conditioning or refrigeration equipment that uses ozone-depleting substances.

J. Pollution Prevention

Not applicable.

K. Specific Conditions

Not applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

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

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

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

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//