

Facility Name: **Turkey Run Municipal Solid Waste Landfill**
 City: Hogansville
 County: Meriwether
 AIRS #: 04-13-199-00025

Application #: TV-477701
 Date Application Received: June 8, 2020
 Permit No: 4953-199-0025-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:

Turkey Run Municipal Solid Waste Landfill

2. Parent/Holding Company Name

Greenbow LLC

3. Previous and/or Other Name(s)

None

4. Facility Location

7144 Lone Oak Road
Hogansville, Georgia 30230

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

Turkey Run Municipal Solid Waste Landfill is located in Meriwether County, which is in attainment for all criteria pollutants.

B. Site Determination

There are no applicable issues with regard to the 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
4953-199-0025-V-03-0	December 7, 2015	Title V renewal
4953-199-0025-V-03-1	May 9, 2017	Update compliance date for GCCS
4953-199-0025-V-03-2	November 10, 2021	Add new temporary Flare T2
4953-199-0025-V-03-3	June 16, 2022	Replacement of temporary Flare T2 with new Flare CD02

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)

The facility does not have a final product. It processes municipal solid waste and disposes of it in a landfill.

3. Overall Facility Process Description

Turkey Run Municipal Solid Waste Landfill receives, manages, and disposes of solid waste including, but not limited to municipal solid waste, commercial waste, and industrial waste. The facility has a design landfill capacity of 31.2 million cubic yards (MMyd³). The waste deposited in the landfill decomposes over time and produces gases termed "landfill gas" (LFG). The LFG is composed primarily of methane and carbon dioxide with small amounts of Nonmethane Organic Compounds (NMOC).

The facility operates a GCCS which meets the requirements of 40 CFR 62 Subpart OOO; the GCCS control device includes utility (open) flares.

The disposal operation also generates a waste liquid called leachate. Leachate is the liquid that comes from or comes in contact with solid wastes and contains contaminants from the solid wastes. Leachate is collected from the collection system at the bottom of each cell and pumped to the facility's leachate storage tank for temporary storage before being hauled (tanker truck) or pumped (via force main) to an offsite leachate disposal facility (public owned treatment works (POTW)).

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 located in Meriwether County, an attainment area for all criteria pollutants. Landfills are not included in the list of 28 listed source categories that have a 100 tpy PSD major source threshold, per 40 CFR 52.21. It is a minor source with respect to PSD/NSR regulations. Potential emissions of each PSD regulated pollutant is less than the major source threshold of 250 tons per year (tpy). The source has never undergone any PSD review.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

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

3. MACT Standards

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

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

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

40 CFR Part 61 Subpart M – NESHAP for Asbestos

Turkey Run Landfill indicated that they are permitted to accept asbestos-containing waste. If the facility ever accepts asbestos waste for disposal, the facility will be subject to the asbestos NESHAP in 40 CFR 61 Subpart M.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
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

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

40 CFR 62 Subpart OOO – Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 2014.

This Federal Operation Plan OOO is applicable to each municipal solid waste landfill that has a design capacity greater than 2.5 million megagrams (Mg) or 2.5 million cubic meters (m³). Turkey Run Landfill has a design capacity exceeding 2.5 million cubic meters. The landfill is

subject to Federal Plan OOO because it commenced construction before July 17, 2014, has not been modified or reconstructed since July 2012, has accepted waste since November 8, 1987, and is not subject to an EPA-approved state plan. Once Georgia Rule (ggg) is an EPA-approved state plan, the landfill will no longer be subject to this Federal Operation Plan.

This Plan duplicates most of the requirements of 40 CFR 60 Subparts WWW and XXX.

40 CFR 61 Subpart M – NESHAP for Asbestos

Turkey Run Landfill is allowed to accept asbestos-containing waste and is, therefore, subject to the asbestos NESHAP in 40 CFR 61 Subpart M. As long as this MSW Landfill 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 63 Subpart AAAA – National Emission Standards for Municipal Solid Waste Landfills

As stated earlier, Turkey Run Landfill is subject to 40 CFR 63 Subpart AAAA.

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

The provisions of Georgia Rule (ggg) apply to each existing municipal solid waste landfill that commenced construction, reconstruction, or modification on or before July 17, 2014 and has either accepted waste at any time since November 8, 1987 or has additional design capacity available for future waste deposition.

The provision of Rule (ggg) apply AFTER the approval of Georgia’s state plan implementing the revised Emissions Guidelines for existing MSW Landfills (40 CFR Part 60 Subpart Cf). Currently, Rule (ggg) is not an EPA approved state plan and does not apply to the landfill. Rule (ggg), however, often cites 40 CFR 60 Subpart Cf and both are comparable to the Federal Operating Plan OOO. Rule (ggg) and Federal Operating Plan OOO are incorporated into the Permit. Therefore, when Rule (ggg) becomes an approved plan, the Permit will not require amending.

C. Compliance Status

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

D. Permit Conditions

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

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

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

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

Condition 2.3.1 established the applicability of 391-3-1-.02(2)(ggg) when Georgia becomes an EPA-approved and currently effective state plan implementing 40 CFR 60 Subpart Cf.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
LF	Landfill with GCCS	40 CFR 62 Subpart A	CD01	Flare #1
		40 CFR 62 Subpart OOO	CD02	Flare #2
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)		

B. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

40 CFR 62 Subpart OOO – Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 2014.

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

40 CFR 61 Subpart M – NESHAP for Asbestos

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

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

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

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

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

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

Georgia Rule (n) requires the facility to minimize fugitive dust from the landfill. This includes using water or chemicals for controlling dust on construction operations, grading of roads, and the clearing of land; covering at all times, when in motion, open bodied trucks transporting material likely to give rise to airborne dust; application of suitable material on dirt roads, materials, stockpiles, and other similar surfaces. Also per this rule, a landfill may not discharge fugitive dust, which exhibits opacity equal to or greater than 20 percent.

C. Permit Conditions

The conditions in Permit 4953-199-0025-V-03-0 (and its amendments) have been updated to reflect that the landfill is now subject to 40 CFR 62 Subpart OOO instead of 40 CFR 60 Subpart WWW.

Condition 3.3.1 (updated from Condition 3.3.2 in Permit 4953-199-0025-V-03-1) includes the GCCS requirements from Subpart OOO.

Condition 3.3.2 (updated from Condition 3.3.3 in Permit 4953-199-0025-V-03-1) requires that the open flares be designed and operated in accordance with 40 CFR 60.18.

Condition 3.3.3 (updated from Condition 3.3.5 in Permit 4953-199-0025-V-03-0) contains the bioreactor requirements from 40 CFR 63 Subpart AAAA if liquid (other than leachate) is added to the landfill in a controlled fashion. Note that changes to Subpart AAAA were promulgated on March 26, 2020. This condition has been updated to reflect the new citations in Subpart AAAA.

Conditions 3.4.1 and 3.4.2 (Conditions 3.4.1 and 3.4.2 in Permit 4953-199-0025-V-03-0) limit fugitive dust and its opacity, in accordance with Rule (n).

Several conditions from Permit 4953-199-0025-V-03-0 (and its amendments) are not in this permit. Condition 3.3.1 was deleted in Permit 4953-199-0025-V-03-1. As noted earlier, the SSM Plan is no longer required effective September 27, 2021, therefore, Condition 3.3.4 has been deleted. Condition 3.4.3 contained general applicability to Subpart OOO for Temporary Flare T2. The general applicability of Subpart OOO has been incorporated into Condition 2.2.1.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63)

prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

The conditions in Permit 4953-199-0025-V-03-0 (and its amendments) have been updated to reflect that the landfill is now subject to 40 CFR 62 Subpart OOO instead of 40 CFR 60 Subpart WWW.

Condition 4.2.1 (updated from Condition 4.2.6 in Permit 4953-199-0025-V-03-1) requires an initial performance test for any new open flares.

The landfill is not allowed to remove 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 34 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) and 62.16714(f). Condition 4.2.2 (updated from Condition 4.2.7 in Permit 4953-199-0025-V-03-1) contains these requirements.

Conditions 4.2.1 through 4.2.5 from Permit 4953-199-0025-V-03-0 (and its amendments) contained the NMOC testing and calculation requirements for uncontrolled landfills. Because the landfill is now required to have a GCCS, these conditions are no longer needed.

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 Turkey Run Landfill is subject to 40 CFR 62 Subpart OOO. The landfill uses open flares to control NMOC. For open flares, monitoring for the continuous presence of a flame is required. The landfill is also required to monitor for the flow to the control devices (open flare) by installing a continuous (at least one reading every 15 minutes) flow monitoring device and visually check any bypass lines present.

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

Once per quarter, the landfill is required to monitor methane concentrations on the surface of the landfill. Excessive concentrations (more than 500 ppm above background concentration) will require reporting of an exceedance, corrective action, and re-monitoring on a prescribed schedule. A program to monitor for cover integrity and making repairs, on a monthly basis, is also required.

The conditions in Permit 4953-199-0025-V-03-0 (and its amendments) have been updated to reflect that the landfill is now subject to 40 CFR 62 Subpart OOO instead of 40 CFR 60 Subpart WWW.

Condition 5.2.1 (updated from Condition 5.2.1 in Permit 4953-199-0025-V-03-1) contains the requirements to monitor (1) presence of a flame on an open flare and (2) flow rate of each control device.

Conditions 5.2.2 through 5.2.7 (updated from Conditions 5.2.2 through 5.2.6 in Permit 4953-199-0025-V-03-1) contain the requirements for wellhead monitoring for temperature, pressure, and oxygen or nitrogen. Conditions 5.2.8 and 5.2.9 (updated from Conditions 5.2.7 and 5.2.8 in Permit 4953-199-0025-V-03-1) contain the requirements for surface methane monitoring. Condition 5.2.10 (updated from Condition 5.2.9 in Permit 4953-199-0025-V-03-1) contains a requirement to monitor landfill cover integrity.

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

Turkey Run Landfill is subject to 40 CFR 62 Subpart OOO 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 which contains bioreactor requirements (if applicable). As noted earlier, a SSM plan is no longer required effective September 27, 2021.

The conditions in Permit 4953-199-0025-V-03-0 (and its amendments) have been updated to reflect that the landfill is now subject to 40 CFR 62 Subpart OOO instead of 40 CFR 60 Subpart WWW.

Condition 6.2.1 (updated from Condition 6.2.5 in Permit 4953-199-0025-V-03-0) requires a closure report when the landfill ceases accepting waste.

Condition 6.2.2 (updated from Condition 6.2.6 in Permit 4953-199-0025-V-03-1) requires a report when the landfill removes or ceases to operate control equipment.

Condition 6.2.3 (updated from Condition 6.2.3 in Permit 4953-199-0025-V-03-1) requires that the facility keep records of the maximum design capacity of the landfill, the current amount of solid waste in place, and the year-by-year waste acceptance rate.

Condition 6.2.4 (updated from Condition 6.2.8 in Permit 4953-199-0025-V-03-1) requires records of the GCCS components.

Condition 6.2.5 (updated from Condition 6.2.10 in Permit 4953-199-0025-V-03-0) requires records of existing and planned collectors in the GCCS.

Condition 6.2.6 (updated from Condition 6.2.11 in Permit 4953-199-0025-V-03-1) requires records of GCCS exceedances.

Condition 6.2.7 requires a report when a required GCCS corrective actions take longer than prescribed in Subpart OOO. This is a new requirement in Subpart OOO.

Condition 6.2.8 (updated from Condition 6.2.9 in Permit 4953-199-0025-V-03-1) requires records of continuous presence of a flame in the open flares.

Condition 6.2.9 requires records of periods when the GCCS or control devices are not operating. This is a new requirement in Subpart OOO.

Conditions 6.2.10 and 6.2.11 (updated from Condition 6.2.12 in Permit 4953-199-0025-V-03-0) contains requirements for excluding areas of the landfill from the GCCS design, when it is required, due to the area being nonproductive of LFG or which contain non-degradable waste.

Conditions 6.2.12 and 6.2.13 (updated from Conditions 6.2.13 and 6.2.14 in Permit 4953-199-0025-V-03-0) contain requirements from 40 CFR 61 Subpart M which are applicable if the landfill accepts asbestos-containing waste.

Conditions 6.2.14 through 6.2.16 (updated from Conditions 6.2.16 through 6.2.18 in Permit 4953-199-0025-V-03-0) contain requirements, which are applicable, if the landfill adds any liquid (other than leachate) to the landfill. The landfill may become subject to the bioreactor requirements in 40 CFR 63 Subpart AAAA if liquids (other than leachate) are added.

Condition 6.2.17 requires records and an annual report if the landfill has employed leachate recirculation in the last 10 years. This is a new requirement from Subpart 000.

Condition 6.2.18 (updated from Condition 6.2.19 in Permit 4953-199-0025-V-03-0) requires records demonstrating implementation of their dust suppression plan to ensure that the landfill complies with Georgia Rule (n).

Condition 6.2.19 (updated from Condition 6.2.20 in Permit 4953-199-0025-V-03-0) requires that the facility report every increase in the design capacity of the landfill and what that increase is.

Several conditions from Permit 4953-199-0025-V-03-0 (and its amendments) are not in this permit. Conditions 6.2.1 through 6.2.4 contained requirements for NMOC calculation and submittal of a GCCS Plan. Because the landfill is subject to the control requirements of Subpart 000, these requirements no longer apply. Condition 6.2.15 required a SSM plan. As noted earlier, the SSM plan is no longer required for landfills.

VII. Specific Requirements

A. Operational Flexibility

None Applicable

B. Alternative Requirements

None Applicable

C. Insignificant Activities

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

D. Temporary Sources

None Applicable

E. Short-Term Activities

When the following activities occur, the Permittee is required to maintain records relating to these activities:

- a) Construction of Landfill Cell
- b) Capping (Closure) of Landfill Cell
- c) GCCS construction

F. Compliance Schedule/Progress Reports

None Applicable

G. Emissions Trading

None Applicable

H. Acid Rain Requirements

None Applicable

I. Stratospheric Ozone Protection Requirements

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

J. Pollution Prevention

None Applicable

K. Specific Conditions

None Applicable

VIII. General Provisions

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

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

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

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

Addendum to Narrative

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

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