

NORTH CAROLINA DIVISION OF AIR QUALITY		Region: Winston-Salem Regional Office	
Air Permit Review - Renewal		County: Guilford	
Permit Issue Date: XXX, 2009		NC Facility ID: 4101086	
		Inspector's Name: Ray Stewart	
		Date of Last Inspection: 02/12/2008	
		Compliance Code: 3 / In Compliance – Inspect.	
Facility Data		Permit Applicability (this application only)	
Applicant (Facility's Name): City of Greensboro - White Street Landfill		SIP: 15A NCAC 2Q .0513	
Facility Address: City of Greensboro - White Street Landfill 2503 White Street Greensboro, NC 27405		NSPS: N/A	
SIC: 4953 / Refuse Systems		NESHAP: N/A	
NAICS: 562212 / Solid Waste Landfill		PSD: N/A	
Facility Classification: Before: Title V After: Title V		PSD Avoidance: N/A	
Fee Classification: Before: Title V After: Title V		NC Toxics: N/A	
		112(r): N/A	
		Other: N/A	
Contact Data		Application Data	
Facility Contact	Authorized Contact	Application Number: 4101086.08A	
D. Scott Bost Acting Solid Waste Disposal Manager (336) 373-7656 P.O. Box 3136 Greensboro, NC 27402 David.Bost@greensboro-nc.gov	Robert Morgan Acting City Manager (336) 373-2033 P.O. Box 3136 Greensboro, NC 27402+3136	Date Received: 04/22/2008	
		Application Type: Renewal	
		Application Schedule: TV-Renewal	
		Existing Permit Data	
		Existing Permit Number: 08830T05	
		Existing Permit Issue Date: 12/12/2005	
		Existing Permit Expiration Date: 02/28/2009	
Review Engineer: Booker Pullen		Comments / Recommendations:	
Regional Engineer: Ray Stewart		Issue: 08830T06	
Review Engineer's Signature:		Permit Issue Date: XXX, 2009	
Date: April 24, 2009		Permit Expiration Date: XXX, 2014	

I. Introduction/Description:

The City of Greensboro-White Street Landfill, owns and operates a municipal solid waste (MSW) landfill located in Guildford County. The renewal application for this landfill (No. 4101086.08A) was received by the Division of Air Quality (DAQ) on April 22, 2008.

This facility used to receive municipal solid waste (garbage) from the city of Greensboro and Guilford County, but currently the landfill now receives only construction and demolition (C&D) waste, which is to put into the landfill, and yard waste and tree branches, which are ground into mulch. The landfill is located on approximately 767 acres within the city limits and is divided into three Phases. Phase I is an unlined, 85-acre cell containing approximately 2.72 million tons of waste that was closed in 1978. Phase II is an unlined, 120-acre site containing approximately 5.5 million tons of refuse that was closed in 1998. Phase III, is a subtitle D lined unit of approximately 51 acres with a design capacity of 4.2 million tons. Phase III is subdivided into three cells and contains a leachate collection system.

The older of the facility's two permitted landfill gas collection systems (ID No. GCCS-1) has approximately 150 wells and has been installed in Phase I and Phase II respectively. The system includes a flare (ID No. CD-1, approximately 95-99% destruction efficiency), which burns off the landfill gas in the case that the boilers at Cone Mills are not operating and burning the gas as fuel.

I. Introduction/Description: (continued)

Phase III was started on December 15, 1997 and is designed to handle a total of 4.8 million cubic yards of waste. Phase III is set up to deliver landfill gas to Cone Mills with its own landfill collection system (ID No. GCCS-2) and has its own associated candle stick-type flare (ID No. CD-3) for use when gas is not being delivered to Cone Mills. The landfill gas collection system (GCCS-2) is online and tied into the existing pipeline.

White Street Landfill performed Tier 2 testing in the past to obtain site-specific parameters that yielded a lower NMOC concentration and emission rate (less than 50 Mg per year) until the year 2004. The gas collection and control system (gccs) was required by May 18, 2005 along with the facility wide toxics demonstration (to satisfy the Last MACT requirement for toxics). A GCCS design plan was received by the DAQ on May 13, 2005, however the design plan did not include the collection of landfill gas from Phase I of the landfill. A letter dated August 2, 2005 was sent to the applicant stating the GCCS plan was not approved by the DAQ because it did not adequately control the landfill gas emissions from the entire landfill. A revised GCCS design plan was submitted to the DAQ in April 2006. An additional information letter was sent to the applicant with additional questions concerning the revised design plan in October 2006. The design plan was approved on November 30, 2006 after receipt of the additional information requested in the October 3, 2006 letter.

II. Purpose of application: The purpose of application No. 410186.08A, received by the Division of Air Quality (DAQ) Raleigh Central Office on April 22, 2008, is for the renewal of a Title V permit in accordance with 15A NCAC 2Q .0513.

III. Statement of Compliance

On the latest inspection of the facility, February 12, 2008 by Mr. Ray Stewart of the Winston-Salem Regional Office, the facility appeared to be in compliance with all applicable regulations.

IV. Table of changes to existing permit No. 08830T05 per renewal application 4101086.08A:

Cover Letter of Permit			
Old Page No.	New Page No.	Condition Number	Changes
Page 1	Page 1	Heading and intro to cover letter	Changed date, revised permit number, revised "complete application" received date, added most current revision of cover letter, added "renewal" in first sentence
Page 2	Page 2	Heading	Changed date on cover letter, changed effective date and issue date of the permit, changed "Chief" signature person
Page 3	Page 3	Table	Updated the "Changes to Permit" table to reflect the renewal application
Permit			
Page 1	Page 1	Cover page of Permit	Changed: Permit No., "replaces Permit No. Revised: application No., complete application date, permit number, issue date, expiration date
Page 2	Page 2	Table of Contents	Removed "Part II" Section
All pages	All pages	Heading	Changed Permit No. to 08830T06
Pages 3-10	Pages 3-17	Body of permit	Added the most current Title V language for all affected sources
Pages 11-19	Pages 18-26	General Conditions	Added most current language for General conditions

V. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which this Title V Operating Permit is being issued

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1 (Phase 2) NSPS, MACT	Non-active (unlined) portion of landfill	GCCS-1	One landfill gas collection and control system (ID No. GCCS-1) including one candle stick-type flare (14-inch tip diameter, 84 million Btu per hour heat input capacity, ID No. CD-1) –or– Gas treatment system
ES-2 (Phase 1) NSPS, MACT	Non-active (unlined) portion of landfill	CD-1	
		CD-Treatment	
ES-3 (Phase 3) NSPS, MACT	Portion of landfill (lined)	GCCS-2	One landfill gas collection and control system (ID No. GCCS-2) including one candle stick-type flare (49.2 million Btu per hour heat input capacity, ID No. CD-3) –or– Gas treatment system
		CD-3	
		CD-Treatment	
ES-4	Horizontal grinder (diesel-fired, 1000 horse power)	None	None

VI. Emission Source-by-Source Evaluation

A. Municipal solid waste landfill (ID Nos. ES-1, ES-2, and ES-3) with associated gas collection & control system (GCCS-1) including one candle stick-type flare (84 million Btu per hour heat input capacity, CD-1), one gas collection & control system (GCCS-2) including one candle stick-type flare (49.3 million Btu per hour heat input capacity, CD-3), and one gas treatment system (ID No. CD-Treatment)

1. 15A NCAC 2D .0516: Sulfur Dioxide Emission Sources From Combustion Sources
2. 15A NCAC 2D .0521: Control of Visible Emissions
3. 15A NCAC 2D .0524: New Source Performance Standards (Subpart WWW)
4. 15A NCAC 2D .1100: Control of Toxic Air Pollutants
5. 15A NCAC 2D .1111: Maximum Achievable Control Technology

No regulatory review is required for the regulations listed above since there are no changes to these sources for this renewal application. Compliance Assurance Monitoring (CAM) does not apply because these sources are regulated by both an NSPS and MACT that were promulgated after 1990 and control the pollutants that would be subject to the CAM.

B. Since the last permit modification and/or renewal for this facility, the regulatory language included in Title V permits was revised to place more of the NSPS requirements into the body of the permit. This new revised language will be placed into this permit along with the revised General Conditions.

VII. A Professional Engineers Seal **is not** required for this renewal application because there are no new sources being added.

VIII. A zoning consistency determination **is not** required for this renewal application. .

IX. An application fee **is not** required for this renewal application.

X. The appropriate number of copies of the application were received by the DAQ on April 22, 2008.

XI. The application was signed by an authorized official as defined by 15A NCAC 2Q .0304(j).

XII. PSD **does not apply** for this renewal.

XIII. Public Notice

A thirty-day public notice and EPA review period **is required**.

Public notice: The 30 day public notice period was from ____ 2009 through ____2009. ____public comments were received for this permit application.

EPA 45-Day review Period: The DAQ sent copies of the appropriate information to the USEPA on ____ 2009. The EPA 45-day review period was from ____2009 through _____. The USEPA ____have any comments on the renewal permit for this facility.

XIV. This facility **is not** subject to 15A NCAC 2Q .0508(g) "Prevention of Accidental Releases" because it does not store any of the listed 112(r) chemicals in quantities above the thresholds.

XV. Ozone Nonattainment:

The US EPA re-designated Guilford County as attainment for the 8-hour ozone standard. The re-designation was placed in the Federal Register on April 2, 2008 (Vol. 73, No. 64 / Wednesday, April 2, 2008 / Rules and Regulation).

XVI. Recommendations:

The Winston Salem Regional Office (Ray Stewart) submitted a regional review of the initial application to the Raleigh Central Office on May 2, 2008. A copy of the review and the draft permit were sent to the Winston-Salem Regional Office and comments were received on April 29, 2009. This permit, issued as a "Renewal" to a Title V permit for the White Street Landfill, located in Greensboro, North Carolina, has been reviewed by the DAQ to determine compliance with all requirements. The Winston Salem Regional Office concurs with the issuance of this permit.

Issue permit No. 08830T06.