

## STATEMENT OF BASIS

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Title V Air Operation Permit Revision  
Permit No. 0170366-005-AV

### APPLICANT

The applicant for this project is the Citrus County Board of County Commissioners. The applicant's responsible official and mailing address are: Casey Stephens, Director, Citrus County Division of Solid Waste, Post Office Box 340, Lecanto, Florida 34460.

### FACILITY DESCRIPTION

The applicant operates the existing Citrus County Central Landfill, which is located in Citrus County at 230 West Gulf to Lake Highway, Lecanto, Florida.

This facility is engaged in landfilling of municipal solid waste (MSW). This landfill has a design capacity greater than 2.5 million megagrams by mass and 2.5 million cubic meters by volume. Landfill operation commenced at this site in 1975. MSW was accepted in the now closed 60 acre western section of the landfill from 1975 through 1990. The active Class I landfill consists of Phases 1, 1A and 2. The 20 acre Phase 1 landfill cell began accepting waste in 1991 and continued through 2005. The active Phase 2 cell began accepting MSW in October of 2005 and is expected to reach its capacity in 2014. (At that time, a new Phase 3 cell is expected begin operation, which will provide additional capacity expected to last until 2027.) Based on the New Source Performance Standards (NSPS) Subpart WWW Tier 2 Sampling and Non-Methane Organic Compounds (NMOC) Emission Estimate Report for this facility dated June 24, 2011, the projected yearly waste acceptance rate was 97,348 megagrams per year (Mg/year) for 2011 and was projected to increase to 124,424 Mg/year for 2016. Based on the June 24, 2011 NMOC emission rate report, the uncontrolled NMOC emissions are estimated to be 8.43 Mg/year for the year 2016. This landfill does not contain a bioreactor. This landfill is permitted to accept asbestos and is an active asbestos waste disposal site. This landfill has a voluntarily installed a landfill gas (LFG) collection and control system with an open candlestick flare used to combust the collected LFG. The LFG collection system and flare became operational in April of 2010.

### REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	MSW Landfill with LFG collection System and Open Candlestick Flare
003	Non-Emergency Diesel Engines (2-10.5, 50 and 99 HP)
004	Emergency Diesel Engine (269 HP)
005	Non-Emergency Diesel Engine (98 HP)
006	Emergency Diesel Engine (65 HP)
007	Emergency Propane Standby Engine (27 HP)

### PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V air operation permit to include National Emissions Standards of Hazardous Air Pollutants (NESHAP) Subpart M, Asbestos, of Title 40, Part 61, of the Code of Federal Regulations (CFR) regulations for the facility to accept asbestos-containing material for disposal, and to identify the existing engines at the landfill.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received September 25, 2014; application complete.

### PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 4953 – Refuse Systems.

North American Industry Classification System (NAICS): 562212 – Solid Waste Landfill.

HAP: The facility is not identified as a major source of hazardous air pollutants (HAP).

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Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

NSPS: The facility operates units subject to the NSPS of 40 CFR 60.

NESHAP: The facility operates units subject to the NESHAP of 40 CFR 61 and 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

### PROJECT REVIEW

The revised permit includes the following changes:

#### 1. Table of Contents

- a. Updated the table of contents to include the engines identified at the landfill.
- b. Removed the referenced attachments for Table WWW1, because it was incorporated into Appendix NSPS, Subpart WWW.

#### 2. Section I. Facility Information.

- a. Subsection A. The Facility Description.
  - (1) Acknowledge that asbestos will now be disposed of at the landfill; and
  - (2) Included the engines at the site.
- b. Subsection B: The Summary of Emissions Units (EU).

Updated to reflect new EU numbers for the engines that were already in the permit and added the additional engines identified at the landfill.
- c. Subsection C: The Applicable Regulations.
  - (1) Include the NESHAP standards for asbestos disposal (40 CFR 61 Subpart M); and
  - (2) Included NSPS for compression ignition (CI) internal combustion engines (ICE) (40 CFR 60 Subpart III).

#### 3. Section III. Emissions Units and Specific Conditions.

- a. Subsection A. Emissions Unit 001.
  - (1) Included in the landfill description that the landfill is an active asbestos waste disposal site.
  - (2) Added Condition A.3 (Asbestos Disposal) identifying NESHAP Subpart M requirements for the disposal of covered asbestos containing waste.
  - (3) Added Condition A.7 (Excavating Asbestos Containing Material) identifying NESHAP Subpart M requirements for excavating or disturbing covered asbestos containing material.
  - (4) Added Conditions A.8 (Asbestos Records and Reports), A.9 (Asbestos Location Records) and A.10 (Asbestos Closure Records) identifying NESHAP Subpart M recordkeeping requirements.
  - (5) This subsection was renumbered to accommodate the new specific conditions.
- b. Subsection B. Emissions Unit 003.

Subsection B previously included EU Nos. 003 and 004. This subsection has been rewritten and now includes only the four non-emergency diesel engines (two 10.5 horse power (HP), one 50 HP and one 99 HP); EU 004 has been moved to a new Subsection C. This subsection now enumerates the applicable aspects of the NESHAP rules that apply to these engines, rather than simply referring to the regulation. The name of EU 003 now reflects the specific engine sizes.
- c. Subsection C. Emissions Unit 004.

This is a new subsection, which covers just the existing emergency diesel Caterpillar generator (269 HP) that has previously been included with EU 003. This subsection enumerates the applicable NESHAP rules for this engine. Engine specifications were also revised based on updated information about this engine from the permittee. The name of EU 004 now reflects the specific engine size.

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- d. Subsection D. Emissions Unit 005.  
This is a new subsection for the non-emergency diesel engine (98 HP) that is being added in this permit revision. This includes the specific NSPS Subsection IIII provisions that apply to this unit.
- e. Subsection E. Emissions Unit 006.  
This is a new subsection for the emergency diesel generator (65 HP) that is being added in this permit revision. This includes the specific NSPS Subsection IIII provisions that apply to this unit.
- f. Subsection F. Emissions Unit 007.  
This is a new subsection for the emergency propane-fueled spark engine generator (27 HP) that is being added in this permit revision. This includes the specific NESHAP Subsection ZZZZ provisions that apply to this unit.

#### 4. Section IV. Appendices.

- a. All appendices have been combined into one Appendices document.
- b. Updated NSPS Subpart WWW (Standards of Performance for MSW Landfills) of 40 CFR 60.
- c. NSPS Subpart IIII (Standards of Performance for Stationary CI ICE) of 40 CFR 60 has been added to the appendices.
- d. NESHAP Subpart A (General Provisions) and Subpart M (National Emissions Standards for Asbestos) of 40 CFR 61 have been added to the appendices.
- e. Updated NESHAP Subpart A (General Provisions) of 40 CFR 63.
- f. Updated NESHAP Subpart ZZZZ (NESHAP for Stationary RICE) of 40 CFR 63 to include all of the existing engines subject to this subpart.
- g. Updated the Table H (Permit History) to include this revision.
- h. Table WWW1, which was previously a separate attachment, has been incorporated into Appendix NSPS, Subpart WWW.

#### CONCLUSION

This project revises Title V air operation permit No. 0170366-004-AV, which was effective on August 27, 2011. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-213, F.A.C.