FINAL DETERMINATION

PERMITTEE

Mr. Cleveland Ferguson, Deputy Chief Administrative Officer
City of Jacksonville, Solid Waste Division
1031 Superior Street
Jacksonville, Florida 32254

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Title V Air Operation Permit Renewal
Permit No. 0310358-015-AV
Trail Ridge Landfill

The purpose of this permitting project is for the renewal of the existing Title V air operation permit for the above referenced facility.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Air Permit package on December 5, 2014. The applicant published the Public Notice of Intent to Issue Air Permit in the Florida Times-Union on December 26, 2014. The Department received the proof of publication on January 15, 2015. A proposed permit was issued for EPA review on January 9, 2015.

COMMENTS

No comments were received from the EPA Region 4 office; however, the following minor comments were received from the applicant.

1. On the Statement of Basis under the list of Primary Regulatory Requirements, "We request clarification as to what program applies for "major source" status for GHGs. In addition, we request that a note be added that "major source" status may change if accounting for biogenic CO_2 emissions changes." Regarding the Statement of Basis comment that the facility is a major source of GHGs, we would appreciate a reference to the fact the FDEP is following EPA's guidance on GHG related to the recent U.S. Supreme court decision. This is not a critical concern to the permit and more of a clarification.

   In response to this comment, the Regulatory Requirement has been clarified as follows:

   > GHG: The facility ~~is identified as a major source of~~ reported approximately 62,221 tons of greenhouse gas (GHG) pollutants for calendar year 2013.

2. Request to remove duplicate B.21. given that condition A.31(b) states the same requirement. Can you add a permitting note under A.31 (c) to state that this condition is repeated under B.22 (2)?

   Conditions A.31. and B.21. were customized by the permit processor to reflect specific requirements for the landfill in Subsection III.A. vs. requirements for the Flare in Subsection III.B. Because each condition is unique to the emissions unit to which it pertains, the requested changes to remove perceived duplication will not be made at this time. However, the Department will entertain suggestions for further streamlining the permit requirements the next time this permit is revised or renewed.

3. Request to add the manufacture date and order date information on the engines that was not available at the time the draft permit was issued.

In response to this comment, the permitting note following the emissions unit description in Subsection III.C has been revised as follows:

{Permitting Note: The emissions units are subject to Prevention of Significant Deterioration (PSD) pursuant to Rule 62-210.200(164)(a)2, F.A.C. and BACT Determination for CO, NOx and PM_{10} emissions. The landfill gas treatment system is subject to 40 CFR Part 60, Subpart WWW -Standards of Performance for Municipal Solid Waste Landfills adopted by reference in Rule 62-204.800(8)(b)72., F.A.C.; 40 CFR Part 63, Subpart AAAA- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste Landfills adopted by reference in Rule 62-204.800(11)(b)59., F.A.C. These emissions units, spark ignition (SI) engines, are regulated as "existing" engines (engines were ordered by the owner/operator prior to 6/12/2006 (i.e., commenced construction) and manufactured ~~prior to 7/1/2007~~from 1/16/2005 to 9/20/2006) under 40 CFR 63, Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) adopted in Rule 62.204.800(11)(b)82, F.A.C. For purposes of regulation under the RICE rules, these engines are considered existing, non-emergency, spark ignition engines firing landfill gas. This permit section addresses "existing" stationary SI RICE greater than 500 HP that ~~is~~ are located at an Area source of HAPs and that ~~has~~have not been modified or reconstructed after 6/12/2006. If a RICE is modified or reconstructed after 7/11/2005, the NSPS 40 CFR 60, Subpart JJJJ, will then apply.}

4. As an administrative change, Facility-wide Condition FW7. was updated to include the EPA reporting address for the Annual Statement of Compliance.

CONCLUSION

The final action of the Department is to issue the permit with the minor changes listed above.