Florida Department of
Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

March 14, 2011

By Electronic Mail, Received Receipt Requested
ptjohnson@co.escambia.fl.us

Mr. Patrick Johnson
Operations Manager
Escambia County Solid Waste
13009 Beulah Road
Cantonment, Florida 32533-8801

Re: Title V Air Operation Permit No. 0330246-003-AV; Perdido Landfill

Dear Mr. Johnson:

This is regarding a January 18, 2011 request from Mark Hadlock of Jones Edmunds, regarding an alternative operating procedure and increased oxygen level at landfill gas wellheads for specific wells at your Perdido Landfill in Escambia County.

In accordance with 40 CFR 60.753(c), the owner or operator of an MSW landfill with a gas collection and control system shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55° C (131°F) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated temperatures do not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

Based on the information provided on landfill gas wellhead elevated oxygen level data and the regulatory provisions of 40 CFR 60.753(c), landfill gas monitoring wells ECSWEW01, 05, 07, 09, 11, 13, 15-19, 21, 23-38, 44-48, 49R, 50, 54-56, 101-138 and ECSWLC57-74 are allowed to operate with an alternate operating procedure (see Attachment 1) and landfill gas well oxygen level greater than 5 percent.

You must address concerns regarding the potential for subsurface fires and methanogen die-off with the increased allowable oxygen level. In accordance with 40 CFR 60.753(d), operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. [Rule 62-4.070(1) & (3), F.A.C.]

Approval for the increased landfill gas oxygen level at the landfill gas wellheads may be revoked if the landfill gas collection system is substantially modified or the basis for the increased oxygen level is determined to be materially incorrect. Allowing the increased wellhead oxygen level does not relieve the facility from any other permitted specific conditions.

If you have any questions, please contact Rick Prusa at 850/595-0634 or e-mail rick.prusa@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator

RB/rp/c

Enclosures
c: Mark Hadlock, P.E.; Jones Edmunds: mhadlock@jonesedmunds.com
Mickey Pollman, Jones Edmunds: mpollman@jonesedmunds.com
Devon Kenney, Escambia County Solid Waste: devon_kenney@co.escambia.fl.us
Dawn Templin, DEP NWD Waste Management: dawn.templin@dep.state.fl.us

NOTICE OF RIGHTS

Persons whose substantial interests are affected by this agency action have a right, pursuant to Sections 120.569 and 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the Department's Northwest District Office, 160 Governmental Center, Pensacola, Florida 32502. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes.

The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner; the county in which the subject matter or activity is located;

(b) A statement of how and when each petitioner received notice of the agency action;

(c) A statement of how each petitioner's substantial interests are affected by the agency action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the agency action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the agency action;

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the agency action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject agency action have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.

Attachment 1

ALTERNATE OPERATING PROCEDURES – Landfill Gas Wells

The alternative operating procedure allows the vacuum to be increased or decreased as needed to control the fluctuating gas flow. This may result in an oxygen concentration limit exceedance or positive pressure exceedance. The alternate operating procedure is described below:

1. For low gas well production wells that have an oxygen concentration limit exceedance, the owner or operator may shut down the wells to allow the landfill gas to build up. This may cause positive pressure and elevated oxygen concentrations in the wellheads. For the wells listed above with alternate operating parameters, the elevated oxygen concentrations and positive pressures will not be considered an exceedance of the operating limits in 40 CFR 60.753 if the owner or operator is complying with the surface methane concentration limit of 500ppm in the vicinity of the wells.

2. If the monthly monitoring indicates that the gas production has improved and the oxygen concentration is below 5 percent, the wells will be operated full-time until the gas quality declines again.

3. The quarterly surface monitoring required by 40 CFR 60.755(c) subpart WWW will continue to be conducted over the surface of the landfill. Standard remediation steps, including evaluating the need to return the wells to service, will be considered along with other options to control surface emissions if an exceedance of the 500ppm methane surface concentration limits is detected in the immediate vicinity.

4. The owner or operator shall continue to monitor as required by 40 CFR 60 subpart WWW the wells on the alternate operating procedures list, with exception that approved elevated operating parameters will not be considered exceedance of the operating limits in 40 CFR 60.755. The results of all monitoring shall be reported to FDEP semiannually in accordance with the requirements of 40 CFR 60 subpart WWW. The reports shall indentify the gas extraction wells with alternate operating procedures.