Waste Management Inc. of Florida
Gulf Coast Sanitary Landfill

Facility ID No. 0710133
Lee County

Title V Air Operation Permit Revision

Permit No. 0710133-016-AV
(Revision of Title V Air Operation Permit No. 0710133-015-AV)

Permitting Authority:

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Permit No. 0710133-016-AV
Gulf Coast Sanitary Landfill
Facility ID No. 0710133
Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility. The existing Gulf Coast Sanitary Landfill is located in Lee County at 11990 State Road 82 East, Fort Myers. UTM Coordinates are: Zone 17424.22 km East and 2942.84 km North. Latitude is: 26°36'21" North; and, Longitude is: 81°45'40" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

0710133-015-AV Effective Date: **November 8, 2011**
0710133-016-AV Effective Date: **October 31, 2014**
Renewal Application Due Date: **March 27, 2016**
Expiration Date: **November 7, 2016**

for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

JFK/dr/es

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

The existing Gulf Coast Sanitary Landfill is a Class 1 and Class III closed municipal solid waste landfill. The landfill has a design capacity of approximately 5.7 million megagrams (Mg) by mass. The landfill began operation in 1976 and was closed on February 2, 2010. The landfill is divided into three cells: Parcel 1, Parcel 2 and Parcel 3. The dates that waste acceptance began in Parcel 1, Parcel 2 and Parcel 3 are 1976, 1985 and 1995 respectively.

The landfill has a gas collection and control system (GCCS) including a 4,300 scfm open flare to control air pollutants emitted from the landfill. The GCCS began operation in all three parcels in June 1999. The landfill contains an asbestos waste disposal site. The landfill does not contain a bioreactor. The non-methane organic compounds (NMOC) emissions were calculated to be greater than 50 Mg per year, however, NMOC emissions are now less than 50 Mg per year.

40 CFR 60.752(b)(2)(v) allows that the collection and control system may be capped or removed provided that: 1) The landfill shall be a closed landfill as defined in 40 CFR 60.751 and a closure report shall be submitted to the Administrator; 2) the collection and control system shall have been in operation a minimum of 15 years; and, 3) following the procedures specified in 40 CFR 60.754(b), the calculated NMOC gas produced by the landfill shall be less than 50 megagrams per year on three successive test dates with the test dates no less than 90 days apart and no more than 180 days apart. Gulf Coast Sanitary Landfill has met these three requirements and is eligible for the capping and removal of collection and control system because: 1) The facility was deemed officially closed by FDEP based on February 2, 2010 correspondence; 2) the collection and control system has been in place for fifteen (15) years as of June 2014 as demonstrated with the initial performance test dated June 1999; and, 3) the site-wide non-methane organic compound (NMOC) emission rate was less than 50 megagrams (Mg) per year for three (3) consecutive monitoring events. Additionally, 40 CFR 60.752(d)(2) states that when the owner or operator meets the conditions for control system removal specified 40 CFR 60.752 (b)(2)(v), the owner or operator is no longer subject to the requirement to maintain an operating permit under part 70 or 71 of this chapter for the landfill if the landfill is not otherwise subject to the requirements of either part 70 or 71. The facility is no longer subject to 40 CFR 60 Subpart A; 40 CFR 60 Subpart WWW; 40 CFR 63 Subpart A; and, 40 CFR 63 Subpart AAAA including all operating and reporting requirements from these subparts in Title V permit 0710133-015-AV. The collection and control system will continue operation for odor control purposes and the facility will still be a major source of air pollutants and subject to Title V. A portable emergency generator (not subject to 40 CFR 63 Subpart ZZZZ) has been added to the facility.

The facility is subject to 40 CFR 61 Subpart M, National Emissions Standards for Asbestos.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
002	Landfill
003	Flare

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

Subsection C. Applicable Regulations.

Based on the Title V air operation permit revision application received June 10, 2014, this facility is not a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
Federal Rule Citations	

40 CFR 61 Subpart M, National Emissions Standard for Asbestos	002
State Rule Citations	
62-4.160, F.A.C.	002, 003
62-210.300, F.A.C.	002, 003
62-210.370, F.A.C.	002, 003
62-213.205, F.A.C.	002, 003
62-213.410, F.A.C.	002, 003
62-213.420, F.A.C.	002, 003
62-213.440, F.A.C.	002, 003
62-296.100, F.A.C.	002, 003
62-296.320, F.A.C.	002, 003
62-297.310, F.A.C.	002, 003

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Speed limits posted at the facility.
b. Maintaining paved roadways.
c. Watering unpaved roadways.
d. Sweeping paved roads.
e. Vegetate areas of final cover in accordance with solid waste plan.

[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source

showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www.epa.gov/osweroe1/content/rmp/index.htm. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

Subsection A. Emissions Unit 002

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
002	Landfill

Emission Unit 002 is a closed municipal solid waste landfill with a design capacity of 5.7 million megagrams (Mg) by volume. The landfill began operation in 1976 and was closed on February 2, 2010. The landfill is divided into three cells, Parcel 1, Parcel 2 and Parcel 3. The dates that waste acceptance began in Parcel 1, Parcel 2 and Parcel 3 are 1976, 1985 and 1995, respectively. The landfill has a gas collection and control system (GCCS) including a 4,300 scfm open flare to control air pollutants emitted from the landfill. The GCCS began operation in all three parcels in June 1999. The landfill contains an asbestos waste disposal site. The landfill does not contain a bioreactor. The non-methane organic compounds (NMOC) emissions were calculated to be greater than 50 Mg per year, however, NMOC emissions are now less than 50 Mg per year.

The landfill gas collection system and flare are no longer specifically required by 40 CFR 60 Subpart WWW and 40 CFR 63 Subpart AAAA.

{Permitting Note: This emissions unit is subject to 40 CFR 61 Subpart M, National Emissions Standards for Asbestos.}

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

A.1. Hours of Operation. This emissions unit may operate continuously (8760 hours per year). [Rule 62-210.200(PTE), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.2. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

OTHER REQUIREMENTS

A.3. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the requirements contained in 40 CFR 61 Subpart M – National Emissions Standards for Asbestos, attached. [Rule 62-213.440, F.A.C.]

Subsection B. Emissions Unit 003

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
003	Flare

Emissions unit 003 is a Parnell Biogas, (model number PNL-101) 4,300 scfm open flare. The flare has a stack height of 42 feet, a combustion temperature of 1,400°F, an exit diameter of 1 foot and a maximum actual volumetric flow rate of 4,300 acfm. The flare commenced construction in early 2004 and commenced operation on April 5, 2004.

The flare and landfill gas collection system are no longer specifically required by 40 CFR 60 Subpart WWW and 40 CFR 63 Subpart AAAA. The flare is subject to the state requirements in Permit No. 0710133-007-AC.

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The process rate shall not exceed 4,300 scfm of landfill gas. The maximum heat input rate shall not exceed 139.2 MMBtu/hr. [Permit No. 0710133-007-AC; Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.]

B.2. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.; Permit No. 0710133-007-AC]

B.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

Unless otherwise specified, the averaging time for Specific Condition **B.4.** is based on the specified averaging time of the applicable test method.

B.4. Visible Emissions. Visible emissions from the candlestick flare shall be less than 20% opacity. [Permit No. 0710133-007-AC]

Excess Emissions

B.5. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

B.6. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.7. Gas Flow Meter Required. The landfill gas flow to the flare shall be measured by an integrating flow meter. [Permit No. 0710133-007-AC]

B.8. Monitoring Gas Flow and Hydrogen Sulfide (H_2S). The gas feed to the flare shall be monitored for flow and also for hydrogen sulfide concentration. Records of the total gas and total hydrogen sulfide combusted for the year shall be included with the annual report. [Permit No. 0710133-007-AC]

Test Methods and Procedures

B.9. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [62-297.401, F.A.C. and Permit No. 0710133-007-AC]

B.10. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.11. Common Testing Requirements. The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C. and Permit No. 0710133-007-AC]

B.12. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), the EU shall be tested to demonstrate compliance with the emissions standards for **VE**. [Rule 62-297.310(7), F.A.C. and Permit No. 0710133-007-AC]

B.13. Compliance Tests Prior To Renewal. Compliance tests shall be performed for **VE** once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Condition **B.4.** [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

*{Permitting Note: Compliance with Specific Condition **B.12.** satisfies the requirement of Specific Condition **B.13.**}*

B.14. Visible Emissions Test Method. Visible emissions tests for the primary flare (EU 003) are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the unit is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA Method 9. [Permit No. 0710133-007-AC]

Recordkeeping and Reporting Requirements

B.15. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix NESHAP, Subpart M – National Emission Standards for Asbestos.