Title V Air Operation Permit Renewal
Permit No. 0710133-016-AV

APPLICANT

The applicant for this project is Waste Management Inc. of Florida. The applicant's responsible official and mailing address are: Mr. Alexander Lacsamana, P.E., District Manager, Waste Management Inc. of Florida, Closed Sites Management Group, Gulf Coast Sanitary Landfill, 1850 Parkway Place, Suite 600, Marietta, Georgia 30067.

FACILITY DESCRIPTION

The applicant operates the existing Gulf Coast Sanitary Landfill, which is located in Lee County at 11990 State Road 82 East, Fort Myers, Florida.

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.

The flare 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.

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility. NSPS 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.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued December 7, 1999
Title V Air Operation Permit Renewal issued November 8, 2011
Application for a Title V Air Operation Permit Revision received June 10, 2014

PRIMARY REGULATORY REQUIREMENTS

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

North American Industry Classification System (NAICS): 562219 – Other Nonhazardous Waste Treatment and Disposal.

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

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.).

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

GHG: The facility is not identified as a major source of greenhouse gas (GHG) pollutants.

PROJECT REVIEW

The following changes were made:

- Facility-wide conditions **FW6.** and **FW7.**; and, Appendix RR, Facility-wide Reporting Requirements were changed to reflect the new Annual Operating Report and Title V Annual Emissions Fee rule requirements.
- A portable emergency generator (not subject to 40 CFR 63 Subpart ZZZZ) has been added to the list of insignificant activities in Appendix I.
- All references to and permit requirements of 40 CFR 60 Subpart WWW and 40 CFR 63 Subpart AAAA have been removed.

Changes to the permit made as part of this revision are shown in ~~strike through~~ format for deletions and in double underline format for additions. For ease of identification, all changes have also been highlighted in yellow within the Draft/Proposed permit document and Appendices. Strike through, underlines and highlights will be removed in the final documents

CONCLUSION

This project revises Title V air operation permit No. 0710133-015-AV, which was effective on November 8, 2011. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.