Initial Title V Air Operation Permit
Permit No. 1050439-001-AV

APPLICANT

The applicant for this project is Republic Services of Florida, Ltd. The applicant's responsible official and mailing address are: Mr. Mark Clatt, Vice President, Republic Services of Florida, Ltd., 8619 Western Way, Jacksonville, FL 32256.

FACILITY DESCRIPTION

The applicant operates the Cedar Trail Landfill, which is located at 2500 West S.R. 60, Bartow, Florida. This solid waste landfill facility consists of existing Class III areas, and a new Class I solid waste landfill area consisting of eight (8) landfill cells (Cells 5 thru 12) with a permitted design capacity of approximately 6.2 million Mg and 8.0 million cubic meters (m^3). The waste permitted to be accepted in the new Class I area does not include Garbage, or other Household Waste except waste from residential sources classified as Class III waste, and does include waste that would be classified as municipal solid waste (MSW). The Class I solid waste landfill began accepting waste (in Cell 5) on 05/31/11.*

This facility also includes a stationary emergency back-up generator with a 40.2 HP diesel fuel fired combustion ignition (CI) reciprocating internal combustion engine (RICE) with a construction date of 2011.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

> **Additional Facility Background Information Note* - *On 12/23/10, the FDEP SW District Solid Waste Program issued a solid waste permit for a new Class I landfill area at this existing landfill facility, which previously consisted of all non-MSW C&D and Class III areas which began operation in April of 1993. The permitted design solid waste storage capacity of the new Class I landfill area was above the NSPS 40 CFR 60 Subpart WWW applicability threshold, thereby making the facility a Title V source by designation in Subpart WWW. This required that an application for an initial Title V air operation permit be submitted within 180 days (i.e., by 06/21/11). On 06/21/11, Republic Services of Florida, Ltd. submitted an application for an initial Title V air operation permit for the Cedar Trail Landfill. This will be the first air permit for this existing landfill facility, as no air construction permit was required or issued for the existing C&D and Class III landfilling activities at this site, or for the new Class I MSW landfill area.*

PROJECT DESCRIPTION

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

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Solid waste permit issued for the Cedar Trail Class I Landfill effective December 23, 2010

Application for an Initial Title V Air Operation Permit received June 21, 2011

Department request for additional information (RAI) dated August 17, 2011

Applicant RAI response received October 28, 2011, and addendum (via email) on November 10, 2011

Notice of Intent to Issue Air Permit issued January 3, 2012

Public notice published January 14, 2012

PRIMARY REGULATORY REQUIREMENTS

Title III: 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.). (Title V source by designation based on being subject to NSPS Subpart WWW.)

PSD: The facility is currently* not a Prevention of Significant Deterioration (PSD) major source of air pollution in accordance with Rule 62-212.400, F.A.C.

*(*PSD Applicability Note - Based on the NSPS 40 CFR 60 Subpart WWW Subpart Tier 1 NMOC Emission Rate Report for Cedar Trail Landfill, the landfill theoretically has the potential to emit > 250 tons/year of NMOC for the year 2013. However this does not represent a true facility potential, but rather a very conservative estimate based on a high EPA default NMOC concentration value - see the NMOC Emissions Rate Estimate Note below.)*

NSPS: The facility does operate emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60. (The solid waste landfill (EU No. 001) is subject to NSPS 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Waste Landfills*. A stationary emergency generator CI RICE engine is subject to NSPS 40 CFR 60 Subpart IIII - Compression Ignition Internal Combustion Engines.)

*(*NMOC Emissions Rate Estimate Note - On 11/10/11, SCS Engineers, the consultant for Republic Services of Florida, Ltd., submitted a revised (from that submitted in the Subpart WWW Initial Class I Landfill Design Capacity Report and Tier 1 NMOC Emission Rate Report for the Cedar Trail Class I Landfill dated 06/06/11 and submitted on 06/09/11) NMOC emission rate estimate which showed Tier 1 NMOC emissions of 204.5 Mg/year, which is above the ≥ 50 Mg/yr level at which NSPS Subpart WWW would require that a LFG collection and control system be designed and installed. The Tier I MNOC emission estimate procedure uses a very conservative (i.e., high) EPA default value for C_{NMOC}, the concentration of NMOC in the landfill gas (LFG) generated by the landfill. This default value is typically as much as 10 times or more higher than the actual site-specific value for C_{NMOC}. This means that the resulting NMOC emission rate estimate is also very conservative, again typically overestimating the site-specific NMOC emissions by as much as a factor of 10 or more. In order to address this, the applicant and their consultant have stated their intentions to conduct NSPS Subpart WWW Tier 2 sampling and analysis within 180 days of the submission of this revised NMOC emission rate estimate (i.e., by 10/28/11 + 180 days = 04/25/12,) and submit a revised report of estimated NMOC emissions using this Tier 2 site specific value for NMOC concentration. This could likely result in estimated NMOC emissions below the 50 Mg/year trigger level, potentially for an extended period.)*

NESHAP: The facility does operate an emissions unit subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63*.

*(*NESHAP Applicability Note - Based on the Tier 1 NMOC emission estimate which shows NMOC emissions ≥ 50 Mg/year, NESHAP 40 CFR 63 Subpart AAAA (National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills) is applicable to the solid waste landfill (EU No. 001). This could change if the Tier 2 NMOC emission estimate results in NMOC emissions < 50 Mg/yr (see NMOC emissions rate estimate note above), as the applicability of Subpart AAAA is only to MSW landfills with NMOC emissions ≥ 50 Mg/year.)*

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the emissions units at the facility as there are no emission control devices.

PROJECT REVIEW

This is the initial Title V air operation permit for this facility. *(Permitting Note- this will be the first air permit issued for this facility. An air construction permit was not ever required or issued for this facility.)*

CONCLUSION

This initial Title V air operation permit is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.