STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0150075-008-AV

APPLICANT

The applicant for this project is Charlotte County Department of Public Works. The applicant's responsible official and mailing address are: Mr. Roger Lescrynski, Project Manager, Charlotte County Department of Public Works, Solid Waste Division, Zemel Road Municipal Solid Waste Management Facility, 25550 Harbor View Road, Unit #2, Port Charlotte, Florida 33980.

FACILITY DESCRIPTION

The applicant operates the Zemel Road Municipal Solid Waste Management Facility, which is located at 29751 Zemel Road, Punta Gorda, Florida.

This facility is a Class I landfill constructed in 1975. The landfill has a design capacity of approximately 7.5 million megagrams (Mg). Since the landfill capacity is equal to or greater than 2.5 million Mg by mass, the facility is subject to Title 40 Code of Federal Regulations (CFR) Part 70 or Part 71 and 40 CFR 60 Subpart WWW. The facility is authorized to accept asbestos waste material. Based on Tier 2 landfill gas (LFG) sampling and analysis conducted in year 2007, non-methane organic compounds (NMOC) generated by this landfill have been calculated to be less than 50 Mg per year. Based upon updated actual and projected waste disposal, this facility has the potential to emit 14.15 tons per year (TPY) volatile organic compounds, 7.83 TPY total hazardous air pollutants, 111.7 TPY carbon monoxide, 20.53 TPY nitrogen oxides, 5.06 TPY particulate matter, 35.10 TPY sulfur dioxide, and an estimated emissions in year 2015 of 37.2 TPY (33.8 Mg/yr) of NMOC. In 2010, the facility completed construction on an active gas collection system and 2000 scfm flare as part of a gas to energy project. The flare was authorized under air construction permit no. 0150075-009-AC. This permit incorporates the flare authorized under permit no. 0150075-009-AC (Title V permit revision application 0150075-010-AC). The gas collection and control system was constructed before being required per 40 CFR 60 Subpart WWW. The facility is not subject to the gas collection and control requirements of Subpart WWW until the facility exceeds 50 Mg NMOC.

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

PROJECT DESCRIPTION

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

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received **September 13, 2010**
Notice of Intent to Issue Air Permit issued **December 21, 2010**

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.).

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

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

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

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

Siting: No emission units were originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility. No emission unit uses a control device to achieve compliance with an emission limitation or standard. No emission unit is subject to an emission limitation or standard.

PROJECT REVIEW

Changes that were made as part of this renewal include reformatting of the permit to reflect the current permit format, replacement of TV-6 with new Appendix TV, and streamlining of EU sections by moving common conditions to the new appendices.

This permit incorporates the flare (EU012) authorized under permit no. 0150075-009-AC (Title V permit revision application 0150075-010-AC).

CONCLUSION

This project renews Title V air operation permit No. 0150075-003-AV, which was issued on March 16, 2006. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.