STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0210051-015-AV

APPLICANT

The applicant for this project is Waste Management Inc. of Florida. The applicant's responsible official and mailing address are: Timothy B. Hawkins, Waste Management Inc. of Florida, Collier County Landfill (a.k.a. Naples Sanitary Landfill), 2700 Wiles Road, Pompano Beach, Florida.

FACILITY DESCRIPTION

The applicant operates the Collier County Landfill (a.k.a. Naples Sanitary Landfill), which is located at in Collier County at 3750 White Lake Boulevard, Naples, Florida 34117.

This is a renewal of Title V air operation permit No. 0210051-009-AV. The existing facility consists of a Class 1 municipal solid waste landfill with an active gas collection and control system including a 3,000 scfm flare. A portable concrete crusher is authorized to operate on the site. The Collier County Landfill has a design capacity of 14.1 million megagrams (Mg) by volume. The landfill commenced construction and started receiving waste in 1979. The landfill was modified or reconstructed in 1996, 2001 and 2003. The landfill is an active asbestos waste disposal site. The landfill does not contain a bioreactor. The gas collection and control system commenced operation on January 24, 1997. The non-methane organic compounds (NMOC) emissions are calculated to be greater than 50 Mg per year.

The landfill consists of the active cells and closed cells. Active cells are A1, A2, A3 and phase 3 of cell 6. Cell 6 is broken into three phases. Closed cells are phase 1 and 2 of cell 6 (closed in 2000) and cells 3 and 4 closed in 1995. Cells A1, A2, and A3 began accepting waste in 2005, 2007 and 2009, respectively. Cells 3 and 4 began accepting waste in 1979. Cell 6 began accepting waste in 1988.

The facility is subject to 40 CFR 60 Subpart A, General Provisions, 40 CFR 60 Subpart CC, Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills, 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 61 Subpart M, National Emissions Standards for Asbestos,40 CFR 63 Subpart A, General Provisions, 40 CFR 63 AAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills and 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The facility is a major Prevention Significant Deterioration (PSD) facility. The existing facility is a major Prevention Significant Deterioration (PSD) facility. (The facility was issued on April 12, 2010, an air construction permit (no. 0210051-014-AC) for a landfill gas to energy project. As stated in permit no. 0210051-014-AC, upon issuance of the permit, the facility became a major PSD facility.)

The facility has the potential to emit the following pollutants: 140.0 tons per year (TPY) carbon monoxide (CO), 45.45 TPY nitrogen oxides (NO_X), 49.39 TPY volatile organic compounds (VOC), 135.88 TPY sulfur dioxides (SO_2), 42.27 TPY particulate matter (PM). The landfill is a minor source of hazardous air pollutants (HAP).

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 Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued **June 7, 2006**
Title V Air Operation Permit Revision issued **October 26, 2007**
Application for a Title V Air Operation Permit Renewal received **October 22, 2010**
Additional Information Request dated **December 16, 2010**
Additional Information Response received **February 22, 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 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: The facility was not 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.

PROJECT REVIEW

Brief description of any changes that were made as part of this renewal were reformatting, replacement of TV-6 with new Appendix TV, and streamlining of EU sections.

CONCLUSION

This project renews Title V air operation permit No. 0210051-009-AV, which was issued on June 7, 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.