PERMITTEE

Columbia County Board of County Commissioners
1347 NW Oosterhoudt Lane
Lake City, Florida 32055

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance, Permitting Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Permit No. 0230047-004-AV
Columbia/Winfield Solid Waste Facility

The Columbia County Central Landfill is a Closed Class I Landfill that stopped accepting waste before January 6, 1993 and began its 20-year long-term care period on July 3, 1996 (its official closure date). The total site area is 70± acres of which 30± acres are capped. Its final cover system consists of, from top to bottom, a 24-inch protective soil cover layer, a 40-mil polyethylene (PE) geomembrane, and a 12-inch intermediate soil layer. The Landfill's closure design includes gas and groundwater monitoring systems. Additionally, a surface water management system (with surface water monitoring) is associated with the facility.

The contiguous Winfield Solid Waste Facility operating under Solid Waste Permit No. 9862-012 is a 243+acre solid waste management facility with an approximately 23-acre Class I Landfill (which includes Cells 1, 2, and 3), an approximately 21-acre Class III Landfill, a Waste Tire Collection Center, and an approximately 30,000 square foot materials recovery facility (MRF) with leachate collection. The Class I Landfill is authorized to receive 500 tons of waste per day, while the Class III Landfill is authorized to receive 300 tons of waste per day, under normal operating conditions. The MRF was permitted to process Class I waste as a pilot project for a twelve-month period ending August 2013. In 2013 the Division of Solid Waste permitted an expansion of 9.3 acres known as Cell 4 with a possibility of a future Cell 5. The facility design includes a surface water management system, as well as groundwater, surface water, and gas monitoring systems. Activities at the facility generate landfill gases resulting from the decomposition of the solid waste, and particulate matter resulting from vehicular traffic and soil moving/handling. Asbestos containing material is also disposed in the landfill and these activities are subject to the requirements of 40 CFR 61 Subpart M (Set A). This facility does not contain any cells that qualify as a bioreactor.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Air Permit package on December 19, 2013. The applicant published the Public Notice of Intent to Issue Air Permit in the Lake City Reporter on January 3, 2014. The Department received the proof of publication on January 15, 2014. A proposed permit was issued for EPA review on January 3, 2014.

COMMENTS

Comments were received from EPA Region 4 office. Any changes to the permit are shown below in ~~strike through~~ format for deletions and in double underline format for additions. EPA's comments are as follows:

Comment 1. Section II, Subsection A. Emission Unit 002, Condition A.5

a. Based on the cited regulations (40 CFR 61.154), the end of Condition A.5.(c) should read

"Use an alternative emissions control method that has received prior written approval by the Administrator *according to procedures described in 61.149(c)(2)*."

b. The last sentence of the condition, please make the following revision:

"be installed and maintained *as described in 61.154(b)*, or the requirements of (b)(1)"

Response: The Department agrees with the comments and the following changes are made to Specific Condition **A.5.**:

A.5. Asbestos Disposal: Permittee shall comply with at least one of the following requirements of a, b or c:

a) There must be no visible emissions to the outside air from any active waste disposal site where asbestos-containing waste material has been deposited, or

b) At the end of each operating day, or at least once every 24-hour period while the site is in continuous operation, the asbestos-containing waste material that has been deposited at the site during the operating day or previous 24-hour period shall:

(1) Be covered with at least 15 centimeters (6 inches) of compacted non-asbestos-containing material, or

(2) Be covered with a resinous or petroleum-based dust suppression agent that effectively binds dust and controls wind erosion. Such an agent shall be used in the manner and frequency recommended for the particular dust by the dust suppression agent manufacturer to achieve and maintain dust control. Other equally effective dust suppression agents may be used with prior approval by the Administrator. For purposes of the paragraph, any used, spent, or other waste oil is not considered a dust suppression agent.

c) Use an alternative emissions control method that has received prior written approval by the Administrator according to procedures described in 61.149(c)(2).

Unless a natural barrier adequately deters access by the general public, either warning signs or fencing must be installed and maintained as described in 61.154(b), or the requirements of (b)(1) above must be met. [40 CFR 61.154(a), (b), (c) and (d)]

Comment 2. Section II, Subsection A. Emission Unit 002, Condition A.6

a. Consider deleting the last sentence of the condition since it seems to be a duplicate of the first part of the condition.

~~"Permittee shall submit an application for a construction permit and revision to the Title V permit to the Department within one year if the NMOC annual emission rate is equal to or greater than 50 megagrams per year."~~

b. Revise the citation as follows 40 CFR 60.752(b)(2)(i).

Response: The Department agrees with the comments and the following changes are made to Specific Condition **A.6.**:

A.6. Landfill Gas Collection and Control System: If the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, the owner or operator shall:

(a) Submit a collection and control system design plan prepared by a professional engineer to the Administrator within one year.

~~Permittee shall submit an application for a construction permit and revision to the Title V permit to the Department within one year if the NMOC annual emission rate is equal to or greater than 50 megagrams per year.~~ [40 CFR 60.752(b)~~2.~~(2)(i)]

Comment 3. Section II, Subsection A. Emission Unit 002, Condition A.10

a. Since the permit uses its own numbering system instead of following that of the regulations, please revise the first paragraph of the condition to read:

"except as provided for in paragraphs (1)(ii) or (3) (a)(1) or (c) of this section."

b. Also revise the following sentence for clarification purposes:

"(a) The NMOC emission rate report shall contain an annual or five-year estimate of the NMOC emission rate *calculated using the formula and procedures provided in Condition A.7.*"

c. Consider deleting Condition A.10(a)(1) since it seems to be a duplicate of the first paragraph of Condition A.10.

~~"(1) NMOC emission rate reports shall be submitted annually, except as provided for in the paragraphs (1)(ii) and (3) of this section.~~"

d. Consider revising the citation for this condition to read 40 CFR 60.757(b) for clarification purposes.

e. Consider adding 40 CFR 60.743 and 40 CFR 60.755 to the citation for this condition.

Response: The Department agrees with the comments with the following exceptions. By replacing the words "of this section" with "of 40 CFR 60.757(b)", comment 3a will no longer apply. The additional rule citations in comment 3e are not necessary since the landfill has not yet triggered the requirement for a collection and control system. The following changes are made to Specific Condition **A.10.**:

A.10. NMOC Emission Rate Reports:

Each owner or operator subject to the requirements of this subpart shall submit an NMOC emission rate report to the Administrator initially and annually thereafter, except as provided for in paragraphs (1)(ii) or (3) of ~~this section~~ 40 CFR 60.757(b). The Administrator may request such additional information as may be necessary to verify the reported NMOC emission rate.

(a) The NMOC emission rate report shall contain an annual or five-year estimate of the NMOC emission rate calculated using the formula and procedures provided in Specific Condition **A.7.**

~~(1) NMOC emission rate reports shall be submitted annually, except as provided for in paragraphs (1)(ii) and (3) of this section.~~

(~~2~~1) If the estimated NMOC emission rate as reported in the annual report to the Administrator is less than 50 megagrams per year in each of the next five consecutive years, the owner or operator may elect to submit an estimate of the NMOC emission rate for the next five-year period in lieu of the annual report. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the five years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based shall be provided to the Administrator. This estimate shall be revised at least once every five years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the five-year estimate, a revised five-year estimate shall be submitted to the Administrator. The revised estimate shall cover the five-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate.

(b) The NMOC emission rate report shall include all the data, calculations, sample reports and measurements used to estimate the annual or five-year emissions.

(c) Each owner or operator subject to the requirements of this subpart is exempted from the requirements of paragraphs (1) and (2) of this section, after the installation and in compliance operation of a collection and control system. [40 CFR 60.757(b)]

Comment 4. Section II, Subsection A. Emission Unit 002, Condition A.11

a. Please revise the following sentence so that it reads similar to the regulation.

"The Administrator may request additional information as may be necessary to verify that permanent closure has taken place *in accordance with 40 CFR 258.60*."

b. Consider revising the citation for this condition to read 40 CFR 60.757(d) for clarification purposes.

Response: The Department agrees with the comments and the following changes are made to Specific Condition **A.11.**:

A.11. Facility Closure Report: Each owner or operator of a controlled landfill shall submit a closure report to the Administrator within 30 days of waste acceptance cessation. The Administrator may request additional information as may be necessary to verify that permanent closure has taken place in accordance with 40 CFR 258.60. If a closure report has been submitted to the Administrator, no additional wastes may be placed into the landfill. [40 CFR 60.757(d)]

Comment 5. Section II, Subsection A. Emission Unit 002, Condition A.14

a. Consider revising the citation for this condition to read 40 CFR 60.752(d) for clarification purposes.

Response: The Department agrees with the comment and Specific Condition **A.14.** has been revised as follows:

A.7. Requirement for Title V Permit: When a MSW landfill subject to this subpart is closed, 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 and if the following condition is met:

(a) The landfill was never subject to the requirement for a control system (GCCS). [40 CFR 60.752(d)]

Comment 6. Section II, Subsection B. Emission Unit 001-Emissions Unit Description

Please consider adding language regarding the applicability of 40 CFR 60 Subpart AAAA to EU002 Air Curtain Incinerator.

Response: The Department agrees with the comment and the description of Emissions Unit ID 001, Air Curtain Incinerator in **Section III**, **Subsection B.** has been revised to include a permitting note as follows:

{Permitting Note: This emissions unit is regulated by Rule 62-296.401(7), F.A.C., Air Curtain Incinerators and by 40 CFR 60 Subpart AAAA—Standards of Performance for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001, Air Curtain Incinerators That Burn 100 Percent Yard Waste}

Comment 7. Section II, Subsection B. Emission Unit 001-Citations

Per 40 CFR 70.6(a)(1)(i), "The permit shall specify and reference the origin of and authority for each term or condition, and identify any difference in form as compared to the applicable requirement upon which the term or condition is based." The regulations indicate that citation must be to the origin of the requirements contained in the condition. An acceptable citation must include the underlying applicable requirement of the condition (*i.e.*, a preconstruction permit, a rule or regulation and section, or both) in which it is based.

a. Please revise the citation of the following conditions to include construction permit 0230047-001-AC since it is the underlying applicable requirement where the requirements were originally established.

i. Conditions B.3, B.6, B.7, B.8, B.9, B.10, and B.22.

Response: The Department agrees with the comment and a citation for Air Construction Permit 0230047-001-AC has been added to the rule citations at the end of Specific Conditions **B.3.**, **B.6.**, **B.7.**, **B.8.**, **B.9.**, **B.10**, and **B.22.**

b. The citation to Condition B.11 *Visible Emissions* should include a construction permit, a regulation or a rule. Citing of an operating permit is not acceptable. EPA suggests deleting citation of Permit No. 0230047003-AO and adding citation to Rule 62-296.401(7)(b)1.

Response: The Department agrees with the comment and the following change is made to Specific Condition **B.11.**:

B. 11. Visible Emissions: Visible emissions (VE) shall not exceed 10 percent opacity during any 6-minute averaging period. [~~Permit No. 0230047003-AO~~ Rule 62-296.401(7)(b)1, F.A.C.]

c. Consider adding reference to Rule 62-297.310(8)(b) to the citation in Condition B.16. to support the reporting requirements therein.

Response: The Department agrees with the comment and the following change is made to Specific Condition **B.16.**:

B. 16. Compliance Test Notification: The owner or operator shall provide the Department at least 30 days prior notice of any performance test and submit the test report documentation to the Department within 45 days after the completion of the testing. [40CFR 60.8 (d) and Rule 62-297.310(8)(b), F.A.C.]

d. Revise the citation in Condition B.19 since 40 CFR 60.145(c) does not seem to exist in the regulations.

Response: The Department agrees with the comment. The correct rule citation is 40 CFR 60.1450(c). The following change is made to Specific Condition **B.19.**:

B. 19. Frequency of Testing: The owner or operator shall conduct annual tests no more than 13 calendar months following the date of the previous test. [40 CFR 60.1450(c)]

e. Daily operating log requirements set forth in Condition B.20 were first described in operating permit 0230047-003-AO. The cited Rule 62-296.401(7)(c)3. serves as the underlying applicable requirement for part of the requirements in the condition (*i.e.*, length for record keeping and availability of records for inspection) but not exactly for the daily log data to be collected by the permittee. Therefore, EPA recommends adding Rule 62-4.070(3) to the citation, which gives the Department authority to "issue any permit with specific conditions necessary to provide reasonable assurance that Department rules can be met."

Response: The Department agrees with the comment and the following change is made to Specific Condition **B.20.**:

B. 20. Recordkeeping Requirements- Daily Log: A daily operating log shall be maintained and at a minimum contain the following:

a. Date
b. Total Charges
c. Total Material (in ton) charged
d. Daily operating hours, which extends from the start of initial combustion to when all flames have been extinguished
e. Daily average hourly charging rate
f. Total monthly operating hours
g. All maintenance that is performed
h. Comments
i. Operator's Signature

The log shall be kept at the facility in either paper copy or electronic format for a minimum of 5 years and shall be made available to the Department or for an inspector's onsite review upon request.

[Rule 62-296.401(7)(c)3, F.A.C. and Rule 62-4.070(3), F.A.C.]

f. Revise citation to Condition B.21 to read 40 CFR 60.1455(b), (c), (d), and (h).

Response: The Department agrees with the comment and the following change is made to Specific Condition **B.21.**:

B. 21. Record Keeping Retention: The operator or owner shall meet the recordkeeping requirements pursuant to 40 CFR 60 Subpart AAAA-Air Curtain Incinerator.

a. Keeping records of results of all initial and annual opacity test onsite in either paper or electronic formats, unless the Administrator approves another format, for at least 5 years.
b. Make all records available for submittal to the Administrator or for an inspector's onsite review.
c. Keep a copy of the initial and annual report onsite for a period of 5 years.

[40 CFR 60.1455(b), (c), (d), and (h)]

Comment 8. Section II, Subsection B. Emission Unit 001, Condition B.7.b. – Please revise the requirement in Condition B.7.b. for clarity purposes. EPA requests the sentence to read as follows:

"b. Ash shall not be allowed to build up in the pit *of the air curtain incinerator* to higher than 1/3 of the pit depth…"

Response: The Department agrees with the comment and Specific Condition **B.7.b.** has been revised as follows:

a. Ash shall not be allowed to build up in the pit of the air curtain incinerator to higher than 1/3 of the pit depth or to the point where the ash begins to impede combustion, whichever occur first.

Comment 9. Section II, Subsection B. Emission Unit 001, Condition B.12. - Please revise the following sentence in Condition B.12. for clarity purposes.

"Visible Emissions shall not exceed 35 percent opacity during any 6-minute averaging period *during the startup period that is within the first 30 minutes of operation*."

Response: The Department agrees with the comment and Specific Condition **B.12.** has been revised as follows:

B. 12. 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. Visible Emissions shall not exceed 35 percent opacity during any 6-minute averaging period during the startup period that is within the first 30 minutes of operation. The duration of excess emissions shall be minimized but in no case exceed 30-minutes in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-296.401(7)(b)1, F.A.C.; 40 CFR 60.1445(a)(1) & (2); Permit No.0230047- 001 -AC]

Comment 10. Typographical Errors

a. Section I, Subsection C – The emission unit numbers subject to Rule 62-213 *Title V Air Operation Permits for Major Sources of Air Pollution*

Regulation	**EU No(s)**
Rule 62-213, F.A.C. (Title V Air Operation Permits for Major Sources of Air Pollution)	-001, ~~-001~~ -002

Response: The Department agrees with the comment and the duplicate emission unit ID number subject to Rule 62-213 *Title V Air Operation Permits for Major Sources of Air Pollution* has been changed to 002.

In addition to these comments from EPA, a recent rule change governing Title V Annual Emissions Fees and the Annual Operating Report has been made and is now effective. This rule change affects conditions **FW6.** and **FW7.** in Section II – Facility-wide Conditions of the permit. The change to the permit is shown below in ~~strike through~~ format for deletions and in double underline format for additions. The conditions are changed to reflect the new rule language, as follows:

~~**FW6.** Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]~~

~~**FW7.** Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by April 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download 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/permitting/tvfee.htm. [Rule 62-213.205, F.A.C. and §403.0872(11), Florida Statutes (2013)]~~

~~*{Permitting Note: In addition to the change in the Title V fee submission from March 1st to April 1st, Chapter 403.0872(11)(a) has been revised to require that the annual fee be calculated based upon actual emissions rather than allowable emissions, as in the past. The Department will be exploring the development of a revision to the electronic annual operating report (EAOR) application to automatically calculate the amount of the fee based upon actual emission information provided with the annual operating report. When completed, the procedures for submitting the fee and/or the submission address may change. Until further notice, the fees shall continue to be submitted to the address shown in Specific Condition FW7 and according to instructions posted on the Department's fee information web page. Be sure to check the Title V Annual Emissions Fee On-line Information Center (see above web site address) periodically for updates, especially before submitting future Title V fee payments.}*~~

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.****}*

This rule change also affects part of "Appendix RR, Facility-wide Reporting Requirements". An update to this appendix was made on January 10, 2014 and the updated version has been included in the "Appendices".

CONCLUSION

The final action of the Department is to issue the permit with the minor changes listed above.