PERMITTEE

Industrial Power Generating Company, LLC (INGENCO)
2250 Dabney Road
Richmond, VA 23230

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0250623-007-AC
PSD-FL-408, Air Construction Permit
Industrial Power Generating Company, LLC (INGENCO)

This permit authorizes the construction of 24 dual-fuel fired compression ignition reciprocating internal combustion engine/generator sets (Detroit Diesel Series 60) for INGENCO. The proposed work will be performed at the existing Miami-Dade County Solid Waste Management South Dade Landfill, which is located in Miami-Dade County at 24000 SW 97th Avenue, Miami, Florida.

NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on April 20, 2011. The applicant published the Public Notice in the Miami Daily Business Review on April 26, 2011. The Department received the proof of publication on May 9, 2011.

COMMENTS

Applicant

On May 5, 2011, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

Section III

1. *Comment*: In condition 13, the permittee requested the words, "and the amount flared", be removed. INGENCO states that the landfill gas may go to the flare, to the South Dade Wastewater plant as well as INGENCO. INGENCO will collect the required information and calculate on a monthly basis the amount combusted in INGENCO's engines and provide the semiannual sampling data to the county for any emissions calculations it needs to make. The permittee adds, INGENCO should be responsible for only emissions from its operations.

   Response: No change was made to the permit. The HCl emissions are limited in the permit to maintain the facility as a minor hazardous air pollutant (HAP) source. Reporting of the facility's total HCl emissions is required to show this facility is not a major source of HAPs.

2. *Comment*: In condition 25, the permittee requested the removal of the phrase "and information from the vendor indicating that the engines were designed as stationary engines to fire landfill gas." The permittee reiterates that the engines are standard Detroit Diesel Series 60 engines that will be mated to standard generators. The engines will be those manufactured prior to 2000, probably in the 1996-1998 era, prior to any manufacturer certification for use in landfills. INGENCO has added engine and other controls to allow the engines to operate in the dual fuel mode. The controls have been optimized for landfill gas. Counting the

engines in this application, INGENCO has 17 locations with about 486 similarly configured engines operating in the dual fuel mode on fuel oil and methane derived from landfill gas either permitted or in the permitting process. Emissions from the engines operating on landfill gas have been demonstrated by source testing. Emissions from this site will be demonstrated by source testing.

Response: This change has been made to the permit.

CONCLUSION

The final action of the Department is to issue the permit with the minor changes, corrections and clarifications as described above.