PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Florida Department of Environmental Protection
Division of Air Resource Management, Office of Permitting and Compliance
Draft Permit No. 0310358-012-AC/PSD-FL-374C, Air Construction Permit Revision
Draft Permit No. 0310358-013-AV, Title V Air Operation Permit Revision
Trail Ridge Landfill, Trail Ridge Energy
Duval County, Florida

Applicant: The applicant for this project is the City of Jacksonville. The applicant's authorized representative and mailing address is: Ms. Kerri Stewart, Chief Administrative Officer, City of Jacksonville, Public Works Department, 117 West Duval Street, St. James Building, 4th Floor, Jacksonville, FL 32202.

Facility Location: City of Jacksonville operates the existing Trail Ridge Landfill where Trail Ridge Energy is located. The landfill is located in Duval County at 5110 US Highway 301 South, Baldwin, Florida.

Project: The Trail Ridge Landfill is an existing municipal solid waste landfill. The applicant proposes to install and operate four lean-burn reciprocating internal combustion engine/generator sets as part of the existing landfill gas-to-energy plant at the Trail Ridge Landfill. In addition, the applicant has requested a modification to the CO emissions standard as Best Available Control Technology (BACT) for the existing engine/generator sets. The landfill gas will be used to fuel the proposed four and existing six lean-burn reciprocating internal combustion engine/generator sets. The plant will have the potential to generate an additional 6.4 megawatts (MW) of electricity for a combined nominal 16 MW of power to the electrical grid. In addition, the applicant requested a concurrent revision of the Title V air operation permit. The two existing flares will be retained as additional combustion devices for the landfill gas. The landfill gas will be routed through a landfill gas treatment system and then to the engines. As necessary, residual landfill gas will be routed to the flares. The project will result in the following potential emissions increases at the existing landfill: 284.7 tons/year of carbon monoxide (CO); 51.7 tons/year of nitrogen oxides (NO_X); 20.7 tons/year of particulate matter (PM), particulate matter with a mean particle diameter of 10 microns or less (PM_{10}) and particulate matter with a mean particle diameter of 2.5 microns or less ($PM_{2.5}$); 16.6 tons/year of sulfur dioxide (SO_2); and 24.2 tons/year of volatile organic compounds (VOC).

The proposed project is subject to preconstruction review pursuant to Rule 62-212.400, Florida Administrative Code (F.A.C.) for the Prevention of Significant Deterioration (PSD) of Air Quality for emissions of CO, NO_X, PM and PM_{10}. In accordance with this rule, the Department is required to make a determination of the Best Available Control Technology (BACT) for CO, NOx, PM and PM_{10} emissions. The draft permit includes the following preliminary BACT determinations: emissions of CO and NOx will be minimized by the lean-burn combustion design combined with good operating and maintenance practices; and emissions of PM/PM_{10} will be controlled by filtration in the landfill gas treatment system prior to combustion.

The Department reviewed the air quality analysis prepared by the applicant. The project has no predicted significant impact for any pollutants in the nearest PSD Class I area (Okeefenokee National Wildlife Refuge). Therefore, a multi-source modeling analysis for PSD Class I increment was not required. The predicted impacts of CO, PM_{10}, and SO_2 are well below the corresponding PSD Class II significant impact level and no further analysis is required. The 24-hour $PM_{2.5}$ and the 1-hour predicted impacts of NO_X are greater than the corresponding PSD Class II significant impact levels; therefore, a full impact analysis for these pollutants was conducted,including an increment analysis.

The PSD increment represents the amount that new sources in an area may increase ambient ground level concentrations of a pollutant from a regulatory baseline concentration. The emission values input into the model for predicting increment consumption are based on the maximum emissions rates from increment-consuming sources at the facility as well as all other increment-consuming sources in the vicinity of the facility. The following table summarizes the results of the PSD Class II increment analysis.

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PSD Class II Increment Analysis				
Pollutant	**Averaging Time**	**Maximum Predicted Impacts (μg/m^3)**	**Allowable Increment (μg/m^3)**	**Greater than PSD Class II Allowable Increment?**
$PM_{2.5}$	24-hour	3.5	4	NO

As shown above, the maximum predicted impacts are less than the allowable PSD Class II increments.

Permitting Authority: Applications for air construction permits and for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-212 and 62-213 of the F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Office of Permitting and Compliance in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the draft Title V air operation permit revision, the Statement of Basis, the draft construction permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: http://appprod.dep.state.fl.us/air/emission/apds/default.asp.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit and concurrent draft Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the draft Title V air operation permit revisions and the draft air construction permit revision unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the draft Title V air operation permit revision and the draft air construction permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. If timely received written comments result in a significant change to the draft Title V air operation permit revision or the draft air construction permit revision, the Permitting Authority shall issue a revised draft Title V air operation permit revision or a revised draft air construction permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the

Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

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