Title V Air Operation Permit Renewal
Permit No. 0330246-008-AV

APPLICANT

The applicant for this project is the Escambia County Board of County Commissioners, Perdido Landfill. The applicant's responsible official and mailing address are: Patrick Johnson, Lead Division Manager - Department of Solid Waste, Escambia County - Neighborhoods/Community Services Bureau, Perdido Landfill, 13009 Beulah Road, Cantonment, Florida 32533-8801.

FACILITY DESCRIPTION

The applicant operates Perdido Landfill, located at the above address.

This existing landfill is an open Class I and Class III municipal solid waste (MSW) landfill in west-central Escambia County. The total facility encompasses approximately 320 acres of which the active and closed MSW disposal areas currently occupy approximately 110 acres. Solid waste was initially accepted in July 1981. The landfill does not contain a bioreactor. The landfill is an active asbestos waste disposal site, and is subject to 40 CFR 61.154, Standard for active waste disposal sites, which is part of 40 CFR 61 Subpart M. The landfill's maximum design capacity of 6.37 million megagrams exceeds the NSPS Title V criteria of 2.5 million megagrams. Therefore, the facility is subject to 40 CFR 60 (NSPS) Subpart WWW, which requires the operation of a landfill gas collection and control system (LGCCS), since the Tier 1 potential estimates of non-methane organic compounds (NMOC) emissions are greater than 50 megagrams per year. The facility is also subject to 40 CFR 63 Subpart AAAA - National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills. Collected landfill gas is sent to the blower flare station (BFS) using a non-assisted open utility flare, and/or then to a third party landfill gas to energy (LGTE) facility and/or to the flare for combustion. A visible emissions test using EPA Method 22 is conducted every federal fiscal year on the non-assisted open utility flare.

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. The facility is currently permitted to operate two 2,200 scfm open utility flares which have been correctly identified as emission units in this renewal. The utility flares were grouped into emission unit 001which was identified as the, "Class I landfill and gas collection and control system." Also added as an emission unit is the facility's existing emergency engine which is regulated under 40 CFR Part 60 NSPS, Subpart IIII and 40 CFR Part 63 NESHAP, Subpart ZZZZ. Emission Unit 002, nonroad grinder is incorrectly identified in the existing Title V permit as an actual regulated emission unit. The nonroad mobile source is an insignificant emission unit therefore added to the, "List of Insignificant Emissions Units and/or Activities." Appropriate Appendices were added to address applicable regulations for the identified emission units.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received May 20, 2013
Renewed Title V Air Operation Permit effective January 1, 2014

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 and 40 CFR 61.

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

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility because the facility is subject to NSPS and NESHAP regulations.

GHG: The facility is not identified as a major source of green house gas (GHG) pollutants.

PROJECT REVIEW

This is a renewal of Title V permit 0330246-006-AV, effective January 1, 2014. Emission Unit identification for the two utility flares and emergency generator are incorporated into this renewal.

Changes being made during this renewal include the addition of Emission Unit 003 and 004, the facility's existing permitted flares. Also included in the revision is the identification of the existing emergency generator as Emission Unit 005 and stating the applicable regulations. The Title V document itself was updated to incorporate applicable regulations and non-applicable regulations were deleted.

This permit also includes Combined Requirements with the Gulf Power Company's Perdido Landfill Gas-to-Energy Facility because both contiguous facilities are considered one facility for purposes of determining applicability of the Prevention of Significant Deterioration requirements.

CONCLUSION

This project renews Title V air operation permit No. 0330246-006-AV, which was effective on March 1, 2012. 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.