Title V Air Operation Permit Renewal
Permit No. 0530379-003-AV

APPLICANT

The applicant for this project is the Hernando County Board of County Commissioners. The applicant's responsible official and mailing address are: Mr. Scott Harper, Solid Waste Services Manager, Hernando County Solid Waste and Recycling Division, 14450 Landfill Road, Brooksville, Florida 34614.

FACILITY DESCRIPTION

The applicant operates the Hernando County Northwest Solid Waste and Recycling Facility, which is located in Hernando County at 14450 Landfill Road in Brooksville, Florida.

The Hernando County Northwest Solid Waste and Recycling Facility consists of a municipal solid waste (MSW) landfill which includes two closed Class I MSW disposal cells (Cells 1 and 2) totaling approximately 28 acres and an active Class I MSW disposal cell (Cell 3) of approximately 25 acres. Cells 1 and 2 were officially closed in July of 2014 and have been mostly capped and covered with dirt and vegetation. Waste was first placed into Cell 3 in September of 2010. The permitted design capacity of the landfill is approximately 6.17 million cubic yards by volume. This facility began accepting municipal waste in 1990. This landfill currently does not include any bioreactor cells. This landfill has a voluntarily installed (i.e., not required by State or Federal rules or regulations) landfill gas (LFG) collection system on Cells 1 and 2. The collected LFG is piped for combustion to a LFG-fired engine-generator set (1.6 kW) and a non-NSPS regulated open LFG candlestick flare. The facility also has miscellaneous existing and new stationary reciprocating internal combustion engines (RICE).

With the addition of Cell 3, the solid waste permitted capacity of the landfill is over the 2.5 million megagrams (Mg) and 2.5 million cubic meter limits, thereby triggering the applicability of federal New Source Performance Standards at 40 CFR 60, Subpart WWW - Standards for Performance for Municipal Solid Waste Landfills and 40 CFR 60, Subpart A – General Provisions. Based on the required Subpart WWW Tier 2 site sampling performed on June 23, 2014, non-methane organic compound (NMOC) emissions are estimated to be 26.59 Mg/year for the year 2014 and 35.23 Mg/year for the year 2020. These levels are less than the 50 Mg/year level which would trigger the landfill gas (LFG) collection and control system requirement of Subpart WWW.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Municipal Solid Waste Landfill
004	Existing Stationary CI RICE Diesel Engine-driven Emergency Generator
006	Landfill Gas-Fired Engine-Driven Generator Set
007	Non-NSPS Regulated Landfill Gas (LFG) Candlestick Open Flare
008	New Stationary CI RICE Diesel Engine-driven Emergency Generator

APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on October 9, 2014, this facility is not a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 60, Subpart A, NSPS General Provisions	001, 008
40 CFR 60, Subpart WWW – Standards of Performance for Municipal Solid Waste	001

Regulation	EU No(s).
Landfills	
40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	008
40 CFR 61, Subpart M – National Emission Standard for Asbestos	001
40 CFR 63, Subpart A – General Provisions	004
40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines	004
State Rule Citations	
62-4, F.A.C. - Permits	001, 004, 006, 007, 008
62-4.204, F.A.C. – Air Pollution Control – General Provisions	
62-210, F.A.C. - Stationary Sources - General Requirements	
62-213, F.A.C. - Operation Permits For Major Sources of Air Pollution	
62-297, F.A.C. - Stationary Sources - Emissions Monitoring	

This facility also includes 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.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received October 9, 2014
Draft/proposed permit issued December 29, 2014.

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 4953 – Refuse Systems.

North American Industry Classification System (NAICS): 562212 - Solid Waste Landfill.

HAP: 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.).

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60 (Subparts IIII and WWW).

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 61 (Subpart M) and 40 CFR 63 (Subpart ZZZZ).

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility

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

PROJECT REVIEW

The following changes were made to the permit documents as part of this renewal:

1. Removed Emissions Unit (EU) 003 from the permit as an unregulated activity. The fugitive emissions from vehicle traffic is addressed in Facility-wide Condition **FW.5.** for reasonable precautions to prevent emissions of unconfined particulate matter.
2. Moved reciprocating engines previously addressed under EU 002 and 005 from the body of the permit to the list of insignificant activities in Appendix I and deleted these EU ID numbers from the permit. These engines

are portable and meet the definition of non-road engines. As such, they are not subject to the federal reciprocating engine rules.

3. Replaced the facility-wide conditions with latest versions.
4. Updated Subsection III.A. to specifically list applicable requirements as permit conditions, rather than simply references to the federal rule. Updated the emissions unit description to reflect the closing of cell Nos. 1 and 2, and the addition of new cell No. 3.
5. Revised Subsection III.B. to delete EU 002 and 005 and to specifically list the applicable requirements for the existing emergency generator, EU 004, pursuant to 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).
6. Updated Subsections III.C. and III.D. to match the current permit format.
7. A new Subsection III.E. was added to list applicable requirements for the new emergency generator, EU 008, pursuant to 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Internal Combustion Engines (ICE).
8. Appendix TV-6 was removed and replaced by the current standard appendices: Appendix RR, Facility-wide Reporting Requirements; Appendix TR, Facility-wide Testing Requirements; and, Appendix TV, Title V General Conditions.
9. Appendix I, List of Insignificant Emissions Units and/or Activities, was updated.
10. Appendix U, List of Unregulated Emissions Units, was deleted (see item 1).
11. Figure 4, Waste Shipment Record, was added to the appendix section as a referenced attachment for convenience.
12. Appendix H, Permit History, was created and added to the Appendix Section as a referenced attachment for informational purposes.
13. Interactive bookmarks and hyperlinks were added throughout the permit and appendix documents to aid in navigation.

CONCLUSION

This project renews Title V air operation permit No. 0570379-002-AV, which was effective on May 24, 2010. 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.