Waste Management Inc. of Florida
Gulf Coast Sanitary Landfill

Facility ID No. 0710133
Lee County

Title V Air Operation Permit Renewal

Permit No. **0710133-015-AV**
(Renewal of Title V Air Operation Permit No. 0710133-009-AV)

Permitting Authority:

State of Florida
Department of Environmental Protection
Air Resource Management, South District

2295 Victoria Avenue, Suite 365
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Compliance Authority:

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Department of Environmental Protection
Air Resource Management, South District

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Table of Contents

Section **Page Number**

I. Facility Information.
A. Facility Description. 2
B. Summary of Emissions Units. 2
C. Applicable Regulations. 2

II. Facility-wide Conditions. 4

III. Emissions Units and Conditions.
A. Landfill. 6
B. Flare. 8

IV. Appendices. 10
Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart M – National Emission Standards for Asbestos.
Appendix NESHAP, Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.
Appendix NSPS, Subpart A – General Provisions.
Appendix NSPS, Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills.

Referenced Attachments. ..... At End
Figure 1, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance (40 CFR 60, July, 1996).

Florida Department of Environmental Protection

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PERMITTEE:
Waste Management Inc. of Florida
11990 State Road 82 East
Fort Myers, Florida 33913

Permit No. 0710133-015-AV
Gulf Coast Sanitary Landfill
Facility ID No. 0710133
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Gulf Coast Sanitary Landfill is located in Lee County at 11990 State Road 82 East, Fort Myers, Lee County. UTM Coordinates: Zone 17, 424.22 km East and 2942.84 km North; Latitude: 26°36'21" North and Longitude: 81°45'40" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: **November 8, 2011**
Renewal Application Due Date: **March 27, 2016**
Expiration Date: **November 7, 2016**

_____
Jon M. Iglehart
Director of
District Management

JMI/SRM/jw

Subsection A. Facility Description.

The existing Gulf Coast Sanitary Landfill is a Class 1 and Class III closed municipal solid waste landfill. The landfill has a design capacity of approximately 5.7 million megagrams (Mg) by mass. The landfill began operation in 1976 and was closed on February 2, 2010. The landfill is divided into three cells: Parcel 1, Parcel 2 and Parcel 3. The dates that waste acceptance began in Parcel 1, Parcel 2 and Parcel 3 are 1976, 1985 and 1995 respectively.

The landfill has an active gas collection and control system (GCCS) including a 4,300 scfm open flare to control air pollutants emitted from the landfill. The GCCS began operation in all three parcels in June 1999. The landfill contains an active asbestos waste disposal site. The landfill does not contain a bioreactor. The non-methane organic compounds (NMOC) emissions were calculated to be greater than 50 Mg per year, however, NMOC emissions are now estimated to be less than 50 Mg per year.

The facility has removed emissions unit 004 (flare, 848 scfm) from the site. Multiple insignificant activities have been removed from the site including concrete crushing and mulching operations.

The facility is subject to 40 CFR 60 Subpart A, General Provisions, 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 61 Subpart M, National Emissions Standards for Asbestos, 40 CFR 63 Subpart A, General Provisions and 40 CFR 63 Subpart AAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
002	Landfill
003	Flare
Inactive Emission Units (Removed from Facility)	
004	Flare

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received July 26, 2011, 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).
40 CFR 60 Subpart A, General Provisions	002, 003
40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills	002, 003
40 CFR 61 Subpart M, National Emissions Standard for Asbestos	002, 003
40 CFR 63, Subpart A, General Provisions	002
40 CFR 63, Subpart AAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills	002, 003
62-296.320, F.A.C.	002, 003
62-296.370, F.A.C.	002, 003
62-213.440, F.A.C.	002, 003
62-213.205, F.A.C.	002, 003
62-210.370, F.A.C.	002, 003

62-210.300, F.A.C.	002, 003
62-213.420, F.A.C.	002, 003
62-297.310, F.A.C.	002, 003
62-4.160, F.A.C.	002, 003
62-296.100, F.A.C.	002, 003
62-213.410, F.A.C.	002, 003

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Speed limits posted at the facility.
b. Maintaining paved roadways.
c. Watering unpaved roadways.
d. Sweeping paved roads.
e. Vegetate areas of final cover in accordance with solid waste plan.

[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

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 March 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/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. A copy shall also be submitted to EPA at U.S.

EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta, GA 30303. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW10. The owner or operator shall physically remove emissions unit 004 from the facility site within 90 days of issuance date of this permit. [Rule 62-4.070(3), F.A.C.]

{Permitting Note: The permittee requested through the Title V renewal application received July 26, 2011 that EU004 be removed from the Title V renewal permit. EU004 has been physically disconnected from the gas collection system and blower.}

Subsection A. Emissions Unit 002

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
002	Landfill

Emission Unit 002 is a closed municipal solid waste landfill with a design capacity of 5.7 million megagrams (Mg) by volume. The landfill began operation in 1976 and was closed on February 2, 2010. The landfill is divided into three cells, Parcel 1, Parcel 2 and Parcel 3. The dates that waste acceptance began in Parcel 1, Parcel 2 and Parcel 3 are 1976, 1985 and 1995, respectively. The landfill has an active gas collection and control system (GCCS) including a 4,300 scfm open flare to control air pollutants emitted from the landfill. The GCCS began operation in all three parcels in June 1999. The landfill contains an active asbestos waste disposal site. The landfill does not contain a bioreactor. The non-methane organic compounds (NMOC) emissions were calculated to be greater than 50 Mg per year, however, NMOC emissions are now estimated to be less than 50 Mg per year.

The facility is subject to 40 CFR 60 Subpart A, General Provisions, 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 61 Subpart M, National Emissions Standards for Asbestos, 40 CFR 63 Subpart A, General Provisions, and 40 CFR 63 Subpart AAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

A.1. Hours of Operation. This emissions unit may operate continuously (8760 hours per year). [Rule 62-210.200(PTE), F.A.C.]

A.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

TEST METHODS AND PROCEDURES

A.3. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
2E	Determination of Landfill Gas; Gas Production Flow Rate
3A	Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources
3C	Determination of Carbon Monoxide, Methane, Nitrogen, and Oxygen for Stationary Sources
16	Semicontinuous Determination of Sulfur Emissions from Stationary Sources
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography
21	Determination of Volatile Organic Compound Leaks
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
25A	Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer
25C	Determination of Nonmethane Organic Compound (NMOC) in Municipal Solid Waste Landfill Gases

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [62-297.401, F.A.C., 40 CFR 60 Subpart WWW]

A.4. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.5. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Equipment Removal Report	30 days prior to removal or cessation of operation of control equipment	**Appendix WWW**
Semi-Annual Reports		**Appendixes WWW and AAAA**

[Rule 62-213.440, F.A.C.]

{Permitting Note: The owner or operator is required to submit an equipment removal report for any or all control equipment that is removed from the facility. An equipment removal report is required for the removal of emissions unit 004 (flare).}

A.6. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

OTHER REQUIREMENTS

A.7. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the requirements contained in 40 CFR 60, Subpart A – General Provisions, 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 61 Subpart M – National Emissions Standards for Asbestos, 40 CFR 63 Subpart A - General Provisions and 40 CFR 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. [Rule 62-213.440, F.A.C.]

Subsection B. Emissions Unit 003

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
003	Flare

Emissions unit 003 is a Parnell Biogas, (model number PNL-101) 4,300 scfm open flare. The flare has a stack height of 42 feet, a combustion temperature of 1,400°F, an exit diameter of 1 foot and a maximum actual volumetric flow rate of 4,300 acfm. The flare commenced construction in early 2004 and commenced operation on April 5, 2004.

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The process rate shall not exceed 4,300 scfm of landfill gas. The maximum heat input rate shall not exceed 139.2 MMBtu/hr. [Permit No. 0710133-007-AC; Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.]

B.2. Methods of Operation. The operation of the flare shall comply with the requirements of 40 CFR 60.18 of Subpart A. [Rule 62-213.410, F.A.C.]

B.3. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.; Permit No. 0710133-007-AC]

B.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

Unless otherwise specified, the averaging time for Specific Condition **B.5** is based on the specified averaging time of the applicable test method.

B.5. Visible Emissions. The flare shall be operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours. [40 CFR 60.18(c)]

{Permitting Note: Permit 0710133-007-AC required 20% opacity limitation. EU003 is also subject to emissions limitations of 40 CFR 60.18 which is more stringent. Per 62-213.440(1), F.A.C. when there are multiple conflicting applicable requirements they can reduced to a single streamlined condition that is the most stringent of the multiple applicable requirements.}

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS or NESHAP or Acid Rain program provision.

B.6. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

B.7. Gas Flow Meter Required. The landfill gas flow to the flare shall be measured by an integrating flow meter. [Permit No. 0170133-007-AC]

B.8. Monitoring Gas Flow and Hydrogen Sulfide (H_2S). The gas feed to the flare shall be monitored for flow and also for hydrogen sulfide concentration. Records of the total gas and total hydrogen sulfide combusted for the year shall be included with the annual report. [Permit No. 0170133-007-AC]

Test Methods and Procedures

B.9. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
22	Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [62-297.401, F.A.C.]

B.10. Common Testing Requirements. The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The minimum visible emission test duration shall be 2 hours. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.; 40 CFR 60.18]

B.11. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), the EU shall be tested to demonstrate compliance with the emissions standards for **VE**. [Rule 62-297.310(7), F.A.C. and Permit No. 0170133-007-AC]

B.12. Compliance Tests Prior To Renewal. Compliance tests shall be performed for **VE** once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Condition **B.5.** [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C.]

B.13. Visible Emissions Test Method. Visible emissions testing shall be conducted in accordance with Method 22 for a duration of 2 hours.

{Permitting Note: Permit 0710133-007-AC required Method 9 as the VE test method. EU003 is also subject to testing requirements of 40 CFR 60.18 which is more stringent. Per 62-213.440(1), F.A.C. when there are multiple conflicting applicable requirements they can reduced to a single streamlined condition that is the most stringent of the multiple applicable requirements.}

Recordkeeping and Reporting Requirements

B.14. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

B.15. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 60, Subpart A – General Provisions and 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills, attached to this permit as Appendix NSPS A and Appendix WWW, respectively. [Rule 62-213.440, F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart M – National Emission Standards for Asbestos.
Appendix NESHAP, Subpart AAAA – National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.
Appendix NSPS, Subpart A – General Provisions.
Appendix NSPS, Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills.