PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Office of Permitting and Compliance
Draft Permit No. 0970079-011-AC/PSD-FL-429, Air Construction/Prevention of Significant Deterioration Permit
JED Solid Waste Management Facility Expansion
Omni Waste of Osceola County, LLC - JED Solid Waste Management Facility
Osceola County, Florida

Applicant: The applicant for this project is Omni Waste of Osceola County, LLC. The applicant's authorized representative and mailing address are: Mr. Michael Kaiser, Region Engineer Plant Manager, JED Solid Waste Management Facility, Omni Waste of Osceola County, LLC, 1501 Omni Way, St. Cloud 34773.

Facility Location: The applicant operates the existing JED Solid Waste Management Facility, which is located in Osceola County at 1501 Omni Way, St. Cloud, Florida.

Project: The applicant applied on March 12, 2014, to the Department for an air construction (AC)/Prevention of Significant Deterioration (PSD) permit. The AC/PSD permit is to authorize the JED Solid Waste Management Facility Expansion. The proposed expansion will be collocated with the existing JED Landfill.

The existing JED Landfill will be expanded from its current (existing) capacity of 16.2 million tons to an estimated 81.5 million tons. A gas collection & control system will be installed under the expansion into additional cells. All of the landfill gas (LFG) generated will be either routed and combusted in engines or in open flares. The JED landfill currently has one 3,600 scfm open flare. Two (2) open flares with a total flaring capacity of 7,200 scfm and twelve (12) Landfill Gas-to-Energy (LFGTE) CAT® G3520C engines will be added in PSD Phase 1. The lean-burn engine/generator sets will fire LFG to produce up to a combined nominal 19.2 megawatts (MW) of power to the electrical grid. Prior to the LFG going to the engines it will be treated in a treatment and conditioning system. In PSD Phase 2 (full built-out), two (2) additional open flares with a total flaring capacity of 7,200 scfm will be added. After full built-out, a total of four (4) open flares will have been added in addition to the existing one open flare for a total facility-wide flaring capacity of up to 18,000 scfm.

The Department considers this project to be an expansion of the existing facility. The project will result in the following approximate potential emissions: 1,312.4 tons per year (TPY) of carbon monoxide (CO); 230.0 TPY of nitrogen oxide (NOx); 78.5 TPY of particulate matter (PM); 78.5 TPY of PM with aerodynamic diameter less than or equal to 10 micrometers (PM_{10}); 78.5 TPY of PM with aerodynamic diameter less than or equal to 2.5 micrometers ($PM_{2.5}$); 38.9 TPY of sulfur dioxide (SO_2); 156.5 TPY of volatile organic compounds (VOC); 231.9 TPY of non- methane organic compounds (NMOC); and, 374,085.5 TPY of carbon dioxide equivalent (CO_2e). Potential emissions of CO, NOx, PM, PM_{10}, $PM_{2.5}$, VOC, NMOC and GHG from the proposed project exceed the PSD significant emission rates, therefore, the project is subject to PSD preconstruction review for these pollutants in accordance with Rule 62-212.400, F.A.C. Accordingly, determinations of the Best Available Control Technology (BACT) are required for CO, NOx, PM, PM_{10}, $PM_{2.5}$, VOC, NMOC and GHG emissions. Also, air quality analyses are required for CO, NOx, and $PM_{10}/PM_{2.5}$ emissions. PM, VOC, NMOC and GHG have no ambient air quality standards.

Emission sources associated with the proposed project include the 12 lean-burn engine/generator sets and the 4 open flares. The Draft Permit specifies the following preliminary BACT Determinations: CO, VOC, NMOC, NOx, $PM/PM_{10}/PM_{2.5}$ and GHG emissions will be minimized by installing, operating and maintaining the required LFG treatment systems [H_2S scrubbing system and treatment & conditioning system] as well as maintaining the air-to-fuel ratio to ensure efficient combustion. The advanced lean burn engine design, use of treated LFG, good combustion practices and proper maintenance minimizes CO, VOC, NMOC, NOx and $PM/PM_{10}/PM_{2.5}$ emissions. Emissions of $PM_{10}/PM_{2.5}$ will be controlled by filtration in the LFG treatment system prior to combustion in the engines.

The existing facility is not a major source of hazardous air pollutants (HAP). However, the proposed project will cause it to become a major source of HAP. Therefore, the engines are subject to Title 40 Code of Federal Regulations Part 63, Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The existing facility is a Title V Source in accordance with Rule 62-210.200, F.A.C.

(Public Notice to be Published in the Newspaper)

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 (Chassahowitzka National Wildlife Refuge); therefore, a multi-source modeling analysis for PSD Class I increments was not required. A multi-source modeling analysis for PSD Class II increments was required because the project has predicted significant impacts for nitrogen dioxide (NO_2), PM_{10} and $PM_{2.5}$ in the Class II area in the vicinity of the project. An increment analysis was performed for the annual and 24-hour $PM_{2.5}$, the 24-hour PM_{10}, and the annual NO_2 impacts; however, because a 1-hour PSD Class II increment does not exist for NO_2, an increment analysis was not required for that pollutant and averaging time. The following table shows the maximum predicted PSD Class II increments consumed in micrograms per cubic meter ($\mu g/m^3$) by all sources in the area, including this project:

Pollutant	Avg. Time	Max Modeled Impact ($\mu g/m^3$)	PSD Increment ($\mu g/m^3$)	Increment Consumed
NO_2	Annual	2.0	25	8%
$PM_{2.5}$	Annual	0.88	4	22%
	24-hour	8.3	9	92%
PM_{10}	24-hour	8.2	30	27%

Details of the project are provided in the application and the Technical Evaluation & Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212, 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 Division of Air Resource Management's (DARM) Office of Permitting and Compliance is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 2600 Blair Stone Road, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station #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 address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation & Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the Draft Permit by visiting the following web site: http://www.dep.state.fl.us/air/emission/apds/default.asp and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all applicable provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit 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 Permit and requests for a public meeting for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 30-day period. In addition, if a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received comments result in a significant change to

the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. 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 the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, 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. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, Agency.Clerk@dep.state.fl.us, before the deadline. 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, any email address, telephone number and any facsimile number of the petitioner; the name, address any email address, telephone number, and any facsimile 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 interests will be affected by the agency determination; (c) A statement of when and how each 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 indicate; (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 Written 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.