PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Office of Permitting and Compliance

Draft Air Permit No. 1150089-008-AC / PSD-FL-422
Landfill Energy Systems Florida, LLC
Sarasota County, Florida

Applicant: The applicant for this project is Landfill Energy Systems Florida, LLC. The applicant's authorized representative and mailing address is: Dennis Plaster, Vice President of Operations, Innovated Energy Systems/Landfill Energy Systems, Sarasota Landfill Gas-to Energy, 4000 Knights Trail Road, Nokomis, Florida 34275.

Facility Location: Landfill Energy Systems Florida, LLC proposes to construct the new Sarasota Landfill Gas-to-Energy plant, which will be collocated with the existing Central County Solid Waste Disposal Complex (CCSWDC), which is located in Sarasota County at 4000 Knights Trail Road, Nokomis, Florida.

Project: Landfill Energy Systems Florida, LLC proposes to construct and operate a landfill gas-to-energy plant. The facility will use landfill gas to fuel four lean-burn reciprocating internal combustion engine/generator sets. The four engine/generator sets will deliver a combined nominal 6.4 megawatts (MW) of power to the electrical grid. Prior to combustion in the engines, the landfill gas will be routed through a landfill gas treatment system, which includes dewatering (a moisture knock-out vessel), gas compressors and blowers, air-to-gas coolers and one- micron particulate filtration. Exhaust gas from each engine will exit an individual stack connected to the engine exhaust manifolds. A noise muffler will be installed on each engine exhaust stack. The existing flare will be retained in its current location and used as necessary to control residual landfill gas not fired in the engines. Construction is scheduled to commence in 2013 and be completed in 2014 for the first three engines. The fourth engine-will be installed approximately one year later when the landfill is expected to produce enough landfill gas to operate the engine.

The Department considers this project to be an expansion of the existing CCSWDC. The project will result in the following approximate potential emissions: 303.1 tons per year (TPY) of carbon monoxide (CO); 52 TPY of nitrogen oxide (NO_X); 20.8 TPY of particulate matter (PM)/PM smaller than 10 micrometers (PM_{10})/PM_{25}; 36 TPY of sulfur dioxide (SO_2); 36.4 TPY of volatile organic compounds (VOC); 45 TPY of non- methane organic compounds (NMOC); and 33,596 TPY of carbon dioxide equivalent (CO_2e). Potential emissions of CO, NO_X and PM_{10}/$PM_{2.5}$ from the proposed project exceed the PSD significant emission rates and the project is subject to PSD preconstruction review for these pollutants. Accordingly, determinations of the Best Available Control Technology (BACT) and an air quality analyses are required for CO, NO_X and PM_{10}/$PM_{2.5}$ emissions.

Emission sources associated with the proposed plant include four 1.6 MW reciprocating internal combustion engine/electrical generator sets. The draft permit specifies the following preliminary BACT determinations: CO and NO_X will be minimized by the lean-burn combustion design combined with good operating and maintenance practices; and emissions of PM_{10}/$PM_{2.5}$ 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 (Chassahowitzka National Wildlife Refuge). Therefore, a multi-source modeling analysis for PSD Class I increment was not required. The Department reviewed a multi-source modeling analysis for PSD Class II increment because the project has predicted significant impacts for nitrogen dioxide (NO_2) and $PM_{2.5}$ in the Class II area in the vicinity of the project. An increment analysis was performed for the 24-hour $PM_{2.5}$ impact; however, because a 1-hour PSD Class II increment does not exist for NO_2, an increment analysis is not required for that pollutant. 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, for $PM_{2.5}$.

Pollutant	Averaging Time	Allowable Increment ($\mu g/m^3$)	Increment Consumed ($\mu g/m^3$)	Increment Consumed Percent
$PM_{2.5}$	24-hour	9.0	1.74	19.3

(Public Notice to be Published in the Newspaper)

Based on the maximum operating scenarios, the project will be a major source of hazardous air pollutants with total potential emissions of 47 tons/year, of which 36.4 tons/year are formaldehyde emissions from the engines. Based on the criteria and hazardous air pollutant emissions, the facility will be Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

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, 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 address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review 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 by entering draft permit number: http://www.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 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 proposed 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 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 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. 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, 3900 Commonwealth Boulevard, MS 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 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 in this proceeding.