Title V Air Operation Permit Renewal and Revision
Permit No. 1170084-010-AV

APPLICANT

The applicant for this project is Seminole County Board of County Commissioners. The applicant's responsible official and mailing address are:

Mr. William Edwards, Manager
Seminole County Solid Waste Management Division
1950 State Road 419
Longwood, FL 32750

FACILITY DESCRIPTION

The applicant operates the Seminole County Osceola Road Landfill, which is located at 1930 East Osceola Road, Geneva, Florida.

Seminole County Solid Waste Management Division operates a municipal solid waste (MSW) landfill which is allocated for Class I MSW. Methane-rich landfill gas produced from the decomposition of disposed waste materials is collected by a gas recovery system. Seminole Energy, LLC operates an electricity generation plant at the Osceola Road Landfill. In order to reduce the amount of landfill gas (LFG) wasted by flaring, all available LFG from the landfill is supplied to Seminole Energy for use as fuel to power the internal combustion (IC) engine electricity generation plant. As a result of these changes, significant emission increases occur for carbon monoxide (CO), particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) and nitrogen oxides (NOx). Any excess landfill gas that exceeds the volume that the Seminole Energy, LLC Plant is able to accept is diverted to open flares for control.

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 and revise the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Renewed Title V Air Operation Permit issued **October 08, 2007**
Title V Air Operation Permit Revision issued **November 19, 2008**
Title V Air Construction Permit Modification issued **January 27, 2009**
Title V Air Construction Permit Modification issued **February 10, 2012**
Application for a Title V Air Operation Permit Revision and Renewal received **January 20, 2012**
Additional Information Request dated **February 22, 2012**
Additional Information Response received **April 09, 2012**

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.

- NSPS, Subpart A – General Provisions.
- NSPS, Subpart WWW– Municipal Solid Waste Landfills.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

- NESHAP, Subpart A – General Provisions.
- NESHAP, Subpart AAAA– Municipal Solid Waste Facilities.
- The facility **is not subject to** NESHAP, Subpart ZZZZ– Reciprocating Internal Combustion Engines based on the amendments to this subpart issued on January 18, 2008, by the U.S. Environmental Protection Agency, and pursuant to 40 CFR 63.6590(a)(1)(iii). A stationary RICE located at an area source of hazardous air pollutant emissions is an existing stationary RICE if the permittee commenced construction before June 12, 2006. The permittee commenced construction (ordered the RICE-generator sets) on December 19, 2005. **Pursuant to 40 CFR 63.6590(b)(3), an existing stationary RICE that combusts landfill gas equivalent to 10 percent or more of the gross heat input on an annual basis does not have to meet the requirements of this subpart (ZZZZ) of 40 CFR 63; and no initial notification is necessary.**

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. The flares at the facility shall be operated with the flame present at all times landfill gas is being routed to the flares as determined by a thermocouple, but the flares are not subject to compliance assurance monitoring (CAM) under 40 CFR Part 64.

PROJECT REVIEW

Changes that were made as part of this renewal and revision include the following:

(1) Reformatting to reflect new Title V template; and

(2) Specific Condition **~~B11~~. B8. Carbon Monoxide (CO)**: The emission rate of CO from each engine/generator set exhaust shall not exceed ~~2.75~~ 3.5 g/bhp-hr and a maximum of ~~13.54~~ 17.2 lb/hr. [Rule 62-212.400(12), F.A.C.]

CONCLUSION

This project renews and revises Title V air operation permit No. 1170084-007-AV, which was issued on November 19, 2008. This Title V air operation permit renewal and revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.