Initial Title V Air Operation Permit
Permit No. 1190053-001-AV

APPLICANT

The applicant for this project is A.C.M.S., Inc. The applicant's responsible official and mailing address are: Mr. Charles Dean, Jr., President, A.C.M.S., Inc., P.O. Box 949, Lake Panasoffkee, Florida 33538.

FACILITY DESCRIPTION

The applicant will operate the currently under construction A.C.M.S., Inc. Class I Landfill, which is located on CR 529 in Bushnell, in Sumter County.

This facility is a permitted Class I solid waste landfill with a total design capacity of approximately 8.5 million cubic yards (6.5 million cubic meters) by volume, and 5.1 million tons (4.64 million megagrams (Mg)) by mass. The facility has a DEP Solid Waste construction permit for four subcells (Subcells 1 – 4) totaling 58.8 acres. The waste permitted to be accepted in this Class I landfill includes waste classified as municipal solid waste (MSW).

Initial construction on lined Subcells 1 and 2 (total of 29.3 acres) of the landfill commenced on May 21, 2012. The landfill expects to begin receiving waste during the first quarter of 2013. The estimated annual waste acceptance rate will increase from 501,562 to 581,447 tons/year (455,965 to 528,588 Mg/year), with an estimated waste acceptance design life of 9.25 years. Landfill gas (LFG) generated by the anaerobic degradation of the waste will be emitted from the landfill after the solid waste is in place for a period of time. Methane and carbon dioxide are the primary components of the landfill gas, with smaller amounts of non-methane organic compounds (NMOC) also being emitted. Based on typical landfill emission estimates, NMOC emissions during the 5 year term of this permit are estimated to increase from 0 Mg/year (0 tons/year) for 2012, to 37.9 Mg/year (41.8 tons per year) for 2017*. The facility as initially constructed will not include a landfill gas collection and control system.

> *(*<u>Estimated NMOC Emissions Note</u> – Based on NMOC emission estimates for this facility from EPA LandGEM modeling using EPA AP-42 typical MSW landfill parameter values. Subpart WWW initial design capacity and NMOC emission rate report, based on the EPA LandGEM LFG emissions model using the very conservative (high) EPA Tier I default value for NMOC concentration in the LFG, predicted that NMOC emissions would exceed 50 MG/yr (the Subpart WWW trigger for the LFG collection and control system design and installation requirements) in 2013 (108.7 Mg/yr)*. It is expected that in 2013 or early 2014 the facility will conduct Tier II sampling and analysis to determine a site specific value for NMOC concentration, which should be significantly below the EPA default value, thereby reducing the estimate NMOC emission rate such that the 50 Mg/yr level likely will not be triggered until sometime past 2017.)*

The design of the facility does not include any areas that would be defined as a bioreactor in accordance with NESHAP Subpart AAAA (National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills) 40 CFR 63.1990. This facility will be an active asbestos disposal site.

Also included in this permit are miscellaneous insignificant/unregulated emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to issue an initial Title V air operation permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for an Initial Title V Air Operation Permit received August 17, 2012

Notice of Intent to Issue Air Permit issued **[Month day, year]** *(To be completed as part of Final Permit)*

Public Notice Published **[Month day, year]** *(To be completed as part of Final permit.)*

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: This facility is a Title V source as defined in Rule 62-210.200.200(193)(definition of Title V Source), Florida Administrative Code (F.A.C.). In accordance with the provisions of Rule 204.800(8)(b)75, F.A.C. and NSPS Subpart WWW 40 CFR 60.752(b), this facility is subject to the Title V major source air operation permitting requirements of Chapter 62-213, F.A.C. by designation.

PSD: The facility is not 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 emissions units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60. (EU No. 001 (Class I Landfill) is subject to NSPS 40 CFR 60 Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills).

NESHAP: At the time of issuance of this permit the facility does operate emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 61. (EU No. 001 (Class I Landfill) is subject to 40 CFR 61 Subpart M (National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos.) At the time of issuance of this permit the facility does not operate emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63*.

> *(* NESHAP 40 CFR 63 Applicability Note - EU No. 001 could become subject to NESHAP 40 CFR 63 Subpart AAAA (National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills) during the term of this permit if estimated uncontrolled NMOC emissions exceed 50 Mg/year.)*

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 emissions units at the facility as there are no emission control devices.

PROJECT REVIEW

This project is the initial Title V air operation permit for this new Class I landfill facility.

CONCLUSION

This project is for the initial Title V air operation permit for this new Class I landfill. This initial Title V air operation permit is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.