PERMITTEE

New River Solid Waste Association
Post Office Box 647
Raiford, Florida 32083

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Northeast District
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590

PROJECT

Permit No. 1250008-005-AV
New River Regional Landfill

The purpose of this project is to revise the Title V air operation permit for the above referenced facility.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Air Permit package on March 21, 2011. The applicant published the Public Notice of Intent to Issue Air Permit in the Union County Times on March 31, 2011. The Department received the proof of publication on April 6, 2011. The intent package included a draft/proposed permit document.

COMMENTS

Comments on the draft/proposed permit renewal were received from Jones Edmunds & Associates, Inc. on behalf of the applicant in a letter received on May 2, 2011. No comments on the proposed permit were received from the EPA Region 4 Office.

The recommended administrative changes were accepted as noted below. ~~Strikethrough~~ indicates deleted text; double-underline indicates added text.

Correction 1: Statement of Basis:

- Paragraph 3: The NRSWA owns an additional 300 acres of contiguous property; therefore please replace 200+ acres with 500 acres.

The language is corrected as follows:

New River Regional Landfill, a municipal solid waste (MSW) landfill with a total site area of ~~200+~~ 500 acres, of which approximately 66.4 acres will be used for disposal of Class I solid waste and 16 acres will be used for disposal of Class III solid waste. The Class I Landfill currently consists of Cells 1 through 5.

Correction 2: Statement of Basis:

- Paragraph 6: The flame/heat sensing device and the flare temperature measuring device are the same thing – a Type K thermocouple. These two items should be combined to read "a flame/heat sensing device to detect the continuous presence of a flame and record the flare temperature".

The language is corrected as follows:

The landfill includes an active gas collection system consisting of both horizontal collection trenches and vertical gas collection wells. This collection system is connected to a landfill gas control system that consists of an open flare with a capacity of 2400 standard cubic feet per minute (scfm). The flare station is equipped with a flow meter to measure the landfill gas flow rate every 15 minutes, a flame/heat sensing device to detect the continuous presence of a flame~~, a flare temperature measuring device so that any flare downtime period is recorded~~ and record the flare temperature. If the temperature falls below preset temperature, the flare and the blowers will be automatically shutdown. The collection line at the flare station is also equipped with sampling ports to monitor pressure, gas concentrations, and the temperature of the incoming LFG.

Correction 3: Permit, Subsection A, Paragraph 1 (page 2 of 39): See Comment 1 above, first bullet item.

The language is corrected as follows:

Subsection A. Facility Description.

New River Regional Landfill, a municipal solid waste (MSW) landfill with a total site area of ~~200+~~ 500 acres, of which approximately 66.4 acres will be used for disposal of Class I solid waste and 16 acres will be used for disposal of Class III solid waste. The Class I Landfill currently consists of Cells 1 through 5.

Correction 4: SC A.17.(1) (Page 9 of 39) and SC A.26. (Page 12 of 39): Replace the phrase "in the gas collection header" to "at the wellhead". Measuring the gauge pressure in the header will not indicate compliance with 40 CFR 60.753(b).

The language in both of these permit conditions is consistent with the language in 40 CFR 60.756(a) and 40 CFR 60.755 (a)(3), respectively:

60.756(a) Each owner or operator seeking to comply with §60.752(b)(2)(ii)(A) for an active gas collection system shall install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and:

(1) Measure the gauge pressure **in the gas collection header** on a monthly basis as provided in §60.755(a)(3); and

(2) Monitor nitrogen or oxygen concentration in the landfill gas on a monthly basis as provided in §60.755(a)(5); and

(3) Monitor temperature of the landfill gas on a monthly basis as provided in §60.755(a)(5).

60.755(a)(3) For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with §60.752(b)(2)(ii)(A)(*3*), the owner or operator shall measure gauge pressure **in the gas collection header** at each individual well, monthly. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under §60.753(b). If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.

Therefore no correction is made to Specific Condition Nos. A.17.(1) and A.26.

Correction 5: SC A.55.a, Page 25 of 39: We request that the following be added at the end of the sentence: "(not required if CO test is conducted)". A site-specific CO test was conducted on the landfill flare on January 7, 2010 and submitted to the FDEP on February 18, 2010. The site-specific CO test indicated that actual flare CI emissions are significantly less than those calculated in t eh permit application using AP-42 values. The Facility's CO emissions are no longer close to the major stationary source threshold, as shown in the Facility's Annual Operating Report. Because the site-specific test has been conducted and CO emissions rate estimates are no longer required, we request that the requirement to record the total landfill gas flow to the flare be removed.

The language is corrected as follows:

A.55. Recordkeeping: ~~In addition with the records required in the permit No.1250008-003-AV,~~ The owner or operator shall ~~also~~ keep the following records to demonstrate that the facility is not a major stationary source due to CO emissions in accordance with Rule 62-212.400(PSD), F.A.C.

a. The total landfill gas flow rate to the flare (not required if CO test is conducted).

b. The supporting information that the owner or operator uses to estimate the CO emissions. The information shall at least include the following:

i. Temperature of the LFG (not required if CO test is conducted).

ii. Methane concentration of LFG (not required if CO test is conducted).

iii. Pressure of the LFG (not required if CO test is conducted).

iv. Site specific CO emissions test data (if available).

c. CO emissions rate in tons/month and tons per 12 consecutive months. The owner or operator shall use the emissions factor of 750 lb CO/million dscf methane to estimate the CO emissions unless the owner or operator demonstrates to the department that an alternative emission factor (i.e. emissions factor developed from site specific test) is more accurate. The owner or operator shall keep record of how CO is estimated (can be in excel spread sheet).

[Rule 62-4.070(3) and 62-212.400(12), F.A.C.; Permit No. 1250008-004-AC; Site-Specific CO test dated January 7, 2010]

Correction 6: SC D.5. (Page 33 of 39) and SC D.9. (Page 35 of 39): The NRSWA was recently issued a new solid waste permit therefore replace the following: specific condition 23 with specific condition 20; Solid Waste Permit No.: 13500-012-SC with 13500-023-SC.

The language is corrected as follows:

D.5. Cover. Asbestos waste shall immediately be covered with either one foot of clean soil or three feet of solid waste that does not contain asbestos and shall continue to meet the initial cover requirements in specific condition 2~~3~~0 of Solid Waste Permit No. 0013500-0~~12~~23-SC.

[40 CFR 61.154(c)(1), subsumed, Solid Waste Permit No. 0013500-0~~12~~23-SC]

D.9. Records – Inspections. Furnish upon request, and make available during normal business hours for inspection by the Administrator, all records required under 40 CFR 61.154.

[40 CFR 61.154(i); Solid Waste Permit No. 0013500-0~~12~~23-SC]

Specific Condition Nos. D.1., D.2., D.3., and D.4. were also corrected to reflect the Solid Waste Permit No. 0013500-023-SC issued on February 17, 2011.

Correction 7: Section IV, Appendices, Page 39 of 39: We request that the reference to "Appendix – Candlestick Flare System Startup, Shutdown, and Operating Procedures" be removed from the permit (on page 39 of 39 and on page i). This Appendix was included in the previous permit and was used for the candlestick flare before a formal Startup, Shutdown and Malfunction (SSM) Plan was submitted to DFEP on February 5, 2010. The SSM Plan is site-specific and inclusive of the procedures listed in the Appendix; therefore this Appendix is not necessary.

The permit has been corrected by removal of the referenced Appendix from the list on Page 39 of 39 and Page i of the permit.

Correction 8: Appendix TR, TR2, Page TR-1 of 7: Based on an email from Meng Lim of FDEP to Rebecca Kelner, P.E., conducting visible emissions tests on the flare at the maximum operating capacity is impractical for the Facility, due to the nature of waste decomposition. We request that TR-2 be revised to allow for visible emissions testing once per fiscal year and that the Facility not be limited to operating the flare within 110% of the tested flow rate.

Appendix TR is the standard Title V Permit format. The conditions are based on the language in Rules 62-297.310(5) - (8), F.A.C. The Class I and Class III landfills is the emissions unit for the facility and the flare is its control device. The maximum gas generating capacity can vary naturally. Based on this, the Department does not believe that a revision to Appendix TR is necessary.

No change has been made to the Appendix.

Correction 9: Appendix – Alternate Standards for Low Gas Production Wells, Item Number 4, Page 1 of 2: We request that the phrase "during quarterly monitoring" be added after "exceedance of 500 ppm surface methane concentration is detected in the vicinity", in order to clarify that monthly surface emission monitoring is not required by the Appendix.

The Appendix has been corrected as follows:

4. **The surface monitoring required by 40 CFR Part 60, Subpart WWW will continue to be conducted in this area. If monthly monitoring indicates that the pressure has built up in the extraction point and an exceedance of 500 ppm surface methane concentration is detected in the vicinity during the required monitoring (at the established frequency required by 40 CFR Part 60, Subpart WWW) , the owner or operator shall make adjustment to vacuum immediately to remove accumulated landfill gas and follows the procedures as described by 40 CFR 60.755 (c)(4) for corrective actions.**

Correction 10: Table 2, Summary of Compliance Requirements:

- Since the Facility has closed and locked the flare bypass line and chooses to comply with 40 CFR 60.756(b)(2)(ii) instead of 40 CFR 60.756(b)(2)(i), (Allowed per S.C.A.19.(2)), we request that this table include an additional line specific to the scenario when the bypass line valve is in the closed position and the requirement for a monthly visual inspection of the seal or closure mechanism.

- We request removing the requirement of annual NMOC testing in the first line of the chart "NMOC/Visible Emissions" because the Facility compliance with 40 CFR 60.752(b)(2)(ii) and is not required to conduct annual NMOC tests.

The Table has been corrected to include the second available option of 40 CFR 60.756(c)(2)(ii).

The Table has been corrected to read only "Visible Emissions" instead of "NMOC/Visible Emissions".

CONCLUSION

The final action of the Department is to issue the permit with the minor changes listed above.