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Kirk Wills  
East Region Engineer  
Sun Country Materials, LLC  
5135 Madison Ave.  
Tampa, FL 33619

RE: Project No. 0571457-001-AC  
Sun Country Materials, LLC  
Initial Construction Permit for a Perennial Energy, Inc., Candlestick Flare

Dear Mr. Wills:

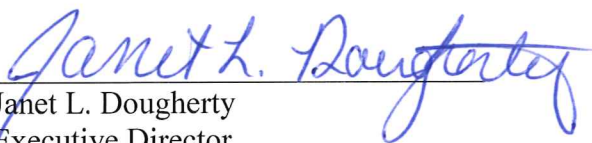
On June 17, 2016, you submitted an application for the after-the-fact construction of a Perennial Energy, Inc., Candlestick Flare at your construction and demolition (C&D) disposal facility. The existing facility is located in Hillsborough County at 11457 County Road 672 in Riverview, FL 33579.

Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact Diana M. Lee, P.E., Chief, Air Permitting, at (813) 627-2600 ext. 1276 or by email at [lee@epchc.org](mailto:lee@epchc.org).

Executed in Tampa, Florida.

Sincerely,

  
Janet L. Dougherty  
Executive Director

Enclosures

JLD/LAW/law

*Environmental Excellence in a Changing World*

**Roger P. Stewart Center**

**3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - [www.epchc.org](http://www.epchc.org)**

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**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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*In the Matter of an  
Application for Air Permit by:*

Sun Country Materials, LLC  
5135 Madison Ave.  
Tampa, FL 33619

Project No. 0571457-001-AC  
Air Construction Permit

*Authorized Representative:*

Kirk Wills, East Region Engineer

Sun Country Materials, LLC  
Candlestick Flare  
Hillsborough County, Florida

**Facility Location:** Sun Country Materials, LLC operates the existing facility, which is located in Hillsborough County at 11457 County Road 672 in Riverview, FL 33579.

**Project:** The applicant applied for a construction permit for the after-the-fact construction of a Perennial Energy, Inc. Candlestick Flare. The flare is used to control odors and combust landfill gas from the C&D disposal facility. Details of the project are provided in the application and the enclosed Technical Evaluation and 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 and 62-210 of the Florida Administrative Code (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 Environmental Protection Commission of Hillsborough County is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's mailing address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is 813-627-2600.

**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 or phone number listed above.

**Notice of Intent to Issue 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 appropriate 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 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.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue

## **WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the draft permit for a period of 14 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 the 14-day period. If written comments received 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) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-260 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

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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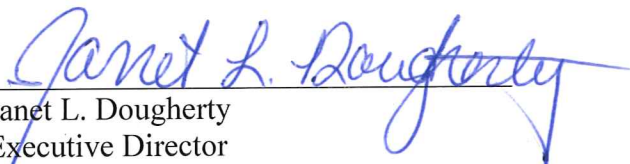
facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting 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 in this proceeding.

Executed in Tampa, Florida.

ENVIRONMENTAL PROTECTION  
COMMISSION OF HILLSBOROUGH COUNTY

  
Janet L. Dougherty  
Executive Director

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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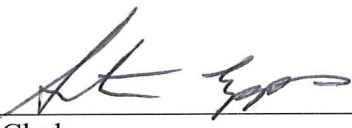
### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this written notice of Intent to Issue Air Permit package (including the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the draft permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested, or was sent via mail, before the close of business on the date indicated below to the following persons.

Kirk Wills - Sun Country Materials, LLC [kirk.wills@progressivewaste.com](mailto:kirk.wills@progressivewaste.com)

Scott A. McCann, P.E. – Geosyntec Consultants, Inc. [smccann@geosyntec.com](mailto:smccann@geosyntec.com)

**FILING AND ACKNOWLEDGMENT FILED**, on this date,  
pursuant to Section 120.52(7), Florida Statutes, with the designated  
agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
Clerk

7-22-2016  
\_\_\_\_\_  
Date

**PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT**  
**ENVIRONMENTAL PROTECTION COMMISSION**  
**OF HILLSBOROUGH COUNTY**  
Draft Air Construction Permit  
Draft Air Permit No. 0571457-001-AC  
Sun Country Materials, LLC  
Hillsborough County, FL

**Applicant:** The applicant for this project is Sun Country Materials, LLC. The applicant's authorized representative and mailing address is: Kirk Wills, 5135 Madison Ave., Tampa, FL 33619.

**Facility Location:** Sun Country Materials, LLC operates the existing facility, which is located in Hillsborough County at 11457 County Road 672, Riverview, FL 33579.

**Project:** This project is for the after-the-fact construction of a Perennial Energy, Inc., Candlestick Flare. The flare is used to combust landfill gas and control odors from the C&D disposal facility. This facility will be a major source of SO<sub>2</sub> emissions.

**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 of the Florida Administrative Code (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 Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's phone number is 813-627-2600.

**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 physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project 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: <https://fldep.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 construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate 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 for a period of 14 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 14-day period. If written comments received 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) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-260 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.



## **TECHNICAL EVALUATION**

**&**

## **PRELIMINARY DETERMINATION**

### **APPLICANT**

Sun Country Materials, LLC  
11457 County Road 672  
Riverview, FL 33579  
Facility ID No. 0571457

### **PROJECT**

Project No. 0571457-001-AC  
Application for an Air Construction Permit  
After-the-Fact Construction of a Perennial Energy, Inc. Candlestick Flare

### **COUNTY**

Hillsborough County, Florida

### **PERMITTING AUTHORITY**

Environmental Protection Commission of Hillsborough County  
3629 Queen Palm Dr.  
Tampa, FL 33619

July 22, 2016



## **1. GENERAL PROJECT INFORMATION**

### **• Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Chapters 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations in Rule 62-204.800, F.A.C.

### **Glossary of Common Terms**

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

### **Facility Description and Location**

Sun Country Materials, LLC is a construction and demolition (C&D) disposal facility and is categorized under Standard Industrial Classification Code No. 4953 – Electric, Gas and Sanitary Services. The existing facility is located in Hillsborough County at 11457 County Road 672, Riverview, FL 33579. The UTM coordinates of the existing facility are Zone 17, 3704.93 km East, and 30717.19 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS), except for ozone. Hillsborough County is designated as an air quality maintenance area for ozone.

### **Facility Regulatory Categories**

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### **Project Description**

This permit authorizes the after-the-fact construction of a Perennial Energy, Inc. Candlestick Flare. The flare is used to combust landfill gas and to control odors from the existing C&D facility. The facility will be a major source of SO<sub>2</sub> emissions.

### **Processing Schedule**

June 17, 2016 - Received the application for a TV air pollution construction permit.

Not Applicable - Requested additional information.

June 17, 2016 - Application Complete.

## **2. DEPARTMENT REVIEW**

This permit authorizes the after-the-fact construction of a Perennial Energy, Inc. Landfill Gas Candlestick Flare. The flare is used to combust landfill gas from the existing construction and demolition (C&D) disposal facility. The flare was installed to address odor complaints from citizens.

The Perennial Energy, Inc., Candlestick Flare combusts landfill gas from disposal cell Nos. 1, 2, and 3. The gas from those cells is vented to the flare using a gas collection system, which consists of a series of vacuum pumps and piping. As more cells are opened in the future, the gas from those cells will also be vented to the flare. In addition, the facility will construct additional piping to vent the landfill gas from the existing, closed C&D disposal areas to the flare. The flare is capable of handling gas flow rates of up to 722 standard cubic feet per minute (scfm). However, as requested by the permittee, the flare will be limited to a maximum flow rate of 300 scfm. The flare combusts landfill gas with propane as a backup fuel as needed.

On July 11, 2016, the facility submitted a gas analysis report for the landfill H<sub>2</sub>S gas. The analysis, which was done on May 18, 2016, showed that the concentration of the landfill gas was 16,000,000 micrograms of H<sub>2</sub>S per cubic meter. In order to account for fluctuations in the gas concentration and to account for additional disposal cells being vented to the flare, the permittee requested that the H<sub>2</sub>S concentration of the gas venting to the flare be limited to a maximum concentration of 24,000,000 micrograms of H<sub>2</sub>S per cubic meter. The limit on the flow rate and the limit on the H<sub>2</sub>S concentration results in potential SO<sub>2</sub> emissions of 222 tons/year.

In June 2015, the facility submitted a request to the FDEP SW District to install and operate the flare as part of a test project to address odor complaints from the nearby citizens. FDEP staff authorized the project in July of 2015. In March 2016, the facility met with EPC and FDEP staff to discuss the air permitting requirements for the flare. Subsequent to this meeting, EPC confirmed with the FDEP Tallahassee office that the EPC is delegated to process the air permit for this type of facility since this facility is a C&D disposal facility and not a landfill as defined under Rule 62-701.200(57), F.A.C.

The facility is subject to Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards. Because the C&D disposal facility does not meet the definition of a municipal solid waste landfill, the facility is not subject to 40 CFR 60 Subpart Cc - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills; 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills; or 40 CFR 63 Subpart AAAA - NESHAP: Municipal Solid Waste Landfills. In addition, the flare does not meet the definition of an incinerator. Therefore, it is not subject to Rule 62-296.401, F.A.C. - Incinerators.

## Summary of Emissions

### Emission Unit 001 – Candlestick Flare

Pollutant	Potential VOC Emissions (TPY)	Actual VOC Emissions (TPY)	Emissions Increase (TPY)	Allowable Emissions
SO <sub>2</sub>	222	0	222	NA
NO <sub>x</sub>	2.9	0	2.9	NA
CO	13.4	0	13.4	NA
PM	1.3	0	1.3	NA

- The actual emissions are zero because the candlestick flare has not been in operation for a full year.
- The potential SO<sub>2</sub> emissions are based on a maximum H<sub>2</sub>S concentration of 24,000,000 microgram/cubic meter, a flowrate of 300 scfm, and 8,760 hours of operation.
- The potential NO<sub>x</sub> and CO emissions are based on emission factors of 0.068 lb/MMBtu and 0.31 lb/MMBtu, respectively, provided by the manufacturer of the candlestick flare, and 8,760 hours of operation.
- The potential PM emissions are based on an emission factor of 17 lb/10<sup>6</sup> dscf CH<sub>4</sub> from AP 42 5<sup>th</sup> Edition, Ch. 2.4, Version dated November 1998 – *Municipal Solid Waste Landfills*. The calculation assumes 100% of the 300 scfm flowrate of air to the flare is 100% CH<sub>4</sub>, which is worst-case.

### Local Requirements

Rules of the EPCHC, Chapter 1-3 - Stationary Air Pollution and Ambient Air Quality Standards

### State Requirements

Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards

### Federal NSPS Provisions

NA

### Other Draft Permit Requirements

NA

## 3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Lora Webb is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting Lora Webb or Diana M. Lee, P.E. Chief, Air Permitting, at (813) 627-2600 or by email at [webbl@epchc.org](mailto:webbl@epchc.org) or [lee@epchc.org](mailto:lee@epchc.org).



#### COMMISSION

Kevin Beckner  
Victor D. Crist  
Ken Hagan  
Al Higginbotham

Lesley "Les" Miller, Jr.  
Sandra L. Murman  
Stacy White

#### DIVISION DIRECTORS

Legal & Admin. Richard Tschantz, Esq.  
Air Management Jerry Campbell, P.E.  
Waste Management Hooshang Boostani, P.E.  
Water Management Sam Elrabi, P.E.  
Wetlands Management Kelly Bishop, P.G.

**EXECUTIVE DIRECTOR**  
Janet L. Dougherty

#### PERMITTEE

Sun Country Materials, LLC  
5135 Madison Ave.  
Tampa, FL 33619

Air Permit No. 0571457-001-AC  
Permit Expires: January 30, 2018

Air Construction Permit  
Candlestick Flare

Authorized Representative:  
Kirk Wills, East Region Engineer

#### PROJECT

This air construction permit authorizes the after-the-fact construction of a Perennial Energy, Inc., Candlestick Flare to combust landfill gas and to control odors. The proposed work will be conducted at the existing facility, which is a construction of demolition (C&D) disposal facility categorized under Standard Industrial Classification No. 4953 – Electric, Gas and Sanitary Services. The existing facility is located in Hillsborough County at 11457 County Road 672, Riverview, FL 33579. The UTM coordinates of the existing facility are Zone 17, 3704.93 km East, and 30717.19 km North.

This permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

#### STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Executed in Tampa, Florida.

**ENVIRONMENTAL PROTECTION  
COMMISSION OF HILLSBOROUGH COUNTY**

---

Janet L. Dougherty  
Executive Director

*Environmental Excellence in a Changing World*

**Roger P. Stewart Center**

**3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - [www.epchc.org](http://www.epchc.org)**

*An Affirmative Action / Equal Opportunity Employer*

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this written notice of Intent to Issue Air Permit package (including the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the draft permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested, or was sent via mail, before the close of business on the date indicated below to the following persons.

Kirk Wills - Sun Country Materials, LLC [kirk.wills@progressivewaste.com](mailto:kirk.wills@progressivewaste.com)  
Scott A. McCann, P.E. – Geosyntec Consultants, Inc. [smccann@geosyntec.com](mailto:smccann@geosyntec.com)

**FILING AND ACKNOWLEDGMENT FILED**, on this date,  
pursuant to Section 120.52(7), Florida Statutes, with the designated  
agency clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

## PROPOSED PROJECT

This permit authorizes the after-the-fact construction of a Perennial Energy, Inc., Landfill Gas Candlestick Flare. The flare is used to combust landfill gas and to control odors from the existing construction and demolition (C&D) disposal facility. The flare is capable of handling gas flow rates of up to 722 standard cubic feet per minute (scfm). However, as requested by the permittee, the flare is limited to a maximum flow rate of 300 scfm. The flare combusts landfill gas with propane as a backup fuel as needed.

The candlestick flare combusts landfill gas from the disposal cell Nos. 1, 2, and 3. The gas from those cells is vented to the flare using a gas collection system, which consists of a series of vacuum pumps and piping. As more cells are opened in the future, the gas from those cells will also be vented to the flare. In addition, the facility will construct additional piping to vent the landfill gas from the existing, closed C&D disposal areas to the flare. The potential SO<sub>2</sub> emissions from the combustion of the landfill gas have been estimated to be 222 tons/year.

This project will add the following emissions unit.

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
001	Landfill Gas Collection and Candlestick Flare

## FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

References Permit No.: NA

Replace Permit No.: NA

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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**FW1. Permitting Authority:** The permitting authority for this project is the Environmental Protection Commission of Hillsborough County. The mailing address is 3629 Queen Palm Dr., Tampa, Florida 33619. All documents related to applications for permits to operate an emissions unit shall be submitted to the Environmental Protection Commission of Hillsborough County.

**FW2. Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Dr., Tampa, Florida 33619.

**FW3. Appendices:** The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

**FW4. Applicable Regulations, Forms and Application Procedures:** Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

**FW5.** All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

**FW6. New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the EPCHC may require the permittee to conform to new or additional conditions. The EPCHC shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPCHC may grant additional time. [Rule 62-4.080, F.A.C.]

**FW7. Modifications:** The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the EPCHC. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

**FW8. Not federally Enforceable. Objectionable Odor Prohibited.** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.; and EPCHC Rule 1-3.22(3)]

**FW9. General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater



than 20% opacity. Emissions from the following types of activities in Hillsborough County are further subject to a general 5% opacity standard: loading or unloading of materials to or from containers such as rail cars, trucks, ships, storage structures and stockpiles; permanent conveyor systems; storage of materials in structures such as silos or enclosed bins, which have a storage capacity of fifty cubic yards or more; crushing, grinding, sizing and screening operations; and, static drop transfer points. [Rule 62-296.320(4)(b)1, F.A.C. and Rule 1-3.52, HCEPC]

**FW10. Emissions of Unconfined Particulate Matter.** Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements: [Rule 62-296.320(4)(c), F.A.C. and Permit Application Received June 17, 2016]

- A) Paving and maintenance of roads, parking areas, and yards.
- B) Application of water or dust suppressants to control emissions from such activities such as vehicular traffic and earth moving.
- C) Application of asphalt, water, oil, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
- D) Application of daily cover in active waste disposal areas.
- E) Landscaping or planting of vegetation.
- F) Reduce vehicular speed, as necessary. Post limits, if necessary.

**FW11.** When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Environmental Protection Commission of Hillsborough County. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

**FW12. Construction and Expiration:** The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(4), 62-4.080 & 62-210.300(1), F.A.C.]

**FW13. Electronic Annual Operating Report and Title V Annual Emissions Fees.** The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's (DEP) Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1<sup>st</sup> of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, Post Office Box 3070, Tallahassee, Florida 32315-3070**. Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/air/emission/tvfee.htm>. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

*{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at [eaor@dep.state.fl.us](mailto:eaor@dep.state.fl.us).}*

*{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.}*

**FW14.** All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

**FW15.** The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited. [Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.]

**FW16.** If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

**FW17. Annual Statement of Compliance.** The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit and to the US. EPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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U.S. Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303  
Attn: Air Enforcement Branch

**FW18. Application for a Title V Operating Permit:** This permit authorizes construction of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 60 days after completion of the compliance testing on the flare. To apply for a Title V operation permit, the applicant shall submit the appropriate application form and such additional information as the Department may by law require. The application shall be submitted to the Environmental Protection Commission of Hillsborough County. [Rules 62-4.030 and 62-4.050, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

#### A. EU 001 - Landfill Gas Collection and Candlestick Flare

This section of the permit addresses the following emissions unit.

EU ID No. 001	Landfill Gas Collection and Candlestick Flare
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#### EQUIPMENT

**A.1. Equipment.** The permittee is authorized to construct a Perennial Energy, Inc. Candlestick Flare. [Rule 62-4.070(3), F.A.C. and Permit Application Received April 21, 2016]

#### PERFORMANCE RESTRICTIONS

**A.2. Permitted Capacity.** The following limitations shall apply to the candlestick flare: [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C. and Permit Application Received June 17, 2016]

- A) The airflow of the landfill gas venting to the candlestick flare shall not exceed 300 standard cubic feet per minute (scfm).
- B) The concentration of the landfill gas venting to the candlestick flare shall not exceed 24,000,000 micrograms H<sub>2</sub>S per cubic meter.
- C) The candlestick flare shall combust only landfill gas with propane as a backup fuel.

**A.3. Hours of Operation.** The hours of operation for this emission unit are not restricted. [Rule 62-210.200(PTE), F.A.C., and Permit Application Received June 17, 2016]

**A.4. Flare Operation.** The facility shall operate and maintain the flare according to the manufacturer's recommended practices. The flare's operation and maintenance manuals and records shall be kept on site for review. [Rule 62-4.070(3), F.A.C.]

#### EMISSIONS STANDARDS

**A.5. General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. [Rule 62-296.320(4)(b)1, F.A.C. and Rule 1-3.52, EPCHC]

#### TEST METHODS AND PROCEDURES

**A.6.** Test the gas venting to the flare for H<sub>2</sub>S concentration using Method ASTM D 5504-12 within 90 days of issuance of this permit. Two copies of the test data shall be submitted to the Air Management Division of the Environmental Protection Commission of Hillsborough County office within 45 days of such testing. The test report shall include information on the sample collection time, the number of cells being vented to the gas collection system, and the location where the sample was taken. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

**A.7.** At least 45 days prior to the performing the test specified in Specific Condition No. A.6. above, the permittee shall submit a test protocol to the EPCHC for review. The test protocol shall include

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

#### A. EU 001 - Landfill Gas Collection and Candlestick Flare

information on the proposed test methodology, the sample collection time, the number of cells that will be vented to the gas collection system, and the location where the sample will be taken. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

**A.8.** In order to demonstrate compliance with Specific Condition No. A.5., test the flare for visible emissions within 90 days of issuance of this permit, using EPA Method 9. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. The EPA Method 9 test for the emission unit shall be a minimum of thirty (30) minutes in duration. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C. [Rule 62-297.310(8)(a) and (10), F.A.C. and Ch. 1-3.52 of the Rules of the EPCHC]

**A.9.** At least 15 days prior to the date on which each required emissions test (Specific Condition Nos. A.6. and A.8.) is to begin, the owner or operator shall notify the EPC, unless shorter notice is agreed to by the EPC. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the EPC a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the EPC by mutual agreement. [Rule 62-297.310(9), F.A.C.]

**A.10. Test Methods:** Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions From Stationary Sources
ASTM D 5504-12	Standard Test Method for Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence

[Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

#### RECORDS AND REPORTS

**A.11.** The permittee shall maintain a monthly recordkeeping system as follows in order to ensure compliance with Specific Condition No. A.2. The records shall be maintained for a minimum of 5 years. The records shall be made available upon request to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency for inspection. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.]

- A) Month, Year
- B) Hours of operation of the Flare
- C) The airflow of the landfill gas venting to the candlestick flare (scfm)
- D) Rolling twelve month total of B)