Memorandum

TO:

Joe Kahn

THROUGH:

Trina Vielhauer

FROM

Syed Arif/Teresa Heron SA/TH

DATE:

March 16, 2009

SUBJECT:

Brevard Energy, LLC - Brevard County Solid Waste Management

Central Disposal Facility

DEP File No. 0090069-006-AC, PSD-FL-378A

The Final Permit for this project is attached for your approval and signature. This project is to modify the original prevention of significant deterioration (PSD) permit, PSD-FL-368, by increasing the emission factor originally used to calculate sulfur dioxide (SO₂) emissions for the six (6) lean burn Caterpillar Model G3520C landfill gas fueled internal combustion engines project at the Brevard County Solid Waste Management Central Disposal Facility (Central Disposal Facility) located in Cocoa. A Best Available Control Technology (BACT) determination is now required for this pollutant pursuant to Rule 62-212.400, F.A.C.

The attached Final Determination identifies issuance of the draft permit, summarizes the publication process, and provides the Department's response to the applicant's comments on the Draft Permit.

We recommend your approval of the attached Final Permit for this project.

Attachments



Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

NOTICE OF FINAL PERMIT

In the Matter of an Application for a PSD Permit Modification by:

Brevard Energy, LLC 29261 Wall Street Wixom, Michigan 48393 DEP File No. 0090069-006-AC Draft Permit No. PSD-FL-378A Central Disposal Facility Brevard County

Authorized Representative: Mr. Scott Salisbury, Managing Member

Enclosed is the final air construction permit to set sulfur dioxide (SO₂) best available control technology (BACT) emissions limit for the already permitted six (6) Caterpillar, Model G3520C, 2,233 brake-horsepower landfill gas-fired engines. The engines will generate up to a total of 9.6 megawatts (nominal rating) of electricity. This permit modification also addresses compliance demonstration requirements for determination of particulate matter and the deletion of references to applicability of 40 Code of Federal Regulations (CFR) Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. The facility is located at the Brevard County Solid Waste Management Central Disposal Facility at 2250 Adamson Road, Cocoa, Brevard County.

The project is subject to the preconstruction requirements for the Prevention of Significant Deterioration (PSD) of Air Quality pursuant to Rule 62-212.400 of the Florida Administrative Code (F.A.C.). As noted in the attached Final Determination, minor changes and clarifications were made to the permit as drafted. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief

Bureau of Air Regulation

(Date)

NOTICE OF FINAL PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Written Permit (including the Final Permit and the Final Determination) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 3/12/09 to the persons listed below.

Scott Salisbury, Brevard Energy, LLC: scott.salisbury@landfillenergy.com
Euripides Rodriguez, Director, SWMD: euripides.rodriguez@brevardcounty.us

Kathleen Forney, EPA Region 4: forney.kathleen@epamail.epa.gov

Dee Morse, NPS: dee morse@nps.gov

James Bradner, DEP-CD: james.bradner@dep.state.fl.us

Jeff Pope, P.E., Clayton Group Services, Inc: <u>jeff.pope@us.bureauveritas.com</u>

David Derenzo, Derenzo & Associates, Inc: dderenzo@derenzo.com
Robert Harvey, Derenzo & Associates, Inc: rharvey@derenzo.com
Vickie Gibson, DEP-BAR: victoria.gibson@dep.state.fl.us (for read file)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

PERMITTEE

Brevard County Solid Waste Management Central Disposal Facility Brevard Energy, LLC 29261 Wall Street Wixom, Michigan 48393

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department) Division of Air Resource Management Bureau of Air Regulation, Special Projects Section 2600 Blair Stone Road, MS #5505 Tallahassee, Florida 32399-2400

PROJECT

Project Number 0090069-006-AC Air Permit Number PSD-FL-378A Brevard Energy, LLC Brevard County

This permit modification is to set sulfur dioxide (SO₂) best available control technology (BACT) emissions limit for the already permitted six (6) Caterpillar, Model G3520C, 2,233 brake-horsepower landfill gas-fired engines. The engines will generate up to a total of 9.6 megawatts (nominal rating) of electricity. This permit modification also addresses compliance demonstration requirements for determination of particulate matter and the deletion of references to applicability of 40 Code of Federal Regulations (CFR) Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.

NOTICE AND PUBLICATION

The Department distributed a Notice of Intent to Issue Air Permit package on February 2, 2009. The Public Notice of Intent to Issue PSD Permit was published on February 12, 2009 in the Orlando Sentinel. The Notice included: the project location and a project summary; a brief description of the Department's determination of Best Available Control Technology (BACT); emission estimate, compliance determination, test methods; and conclusions with regard to the impacts of the air emissions. The Notice also included the instructions on: submittal of written comments; how to request a public meeting; how to petition for an administrative hearing; and how to view the public files at the Department offices in Tallahassee and Orlando.

Additionally the Notice provided the Department's webpage that includes: the Notice; the Application; key correspondence; the Department's Technical Evaluation and Preliminary Determination; the Draft Permit; and written comments received during the 30-day comment period. The described information is available at:

http://www.dep.state.fl.us/air/eproducts/apds/listpermits.asp

COMMENTS

No requests for an administrative hearing were received and no comments on the Draft Permit were received from the public, the Department's Central District Office, the U.S. Fish and Wildlife Service, the National Park Service or the Environmental Protection Agency. Written comments were received from the applicant during the 30-day comment period. These comments are addressed in this final determination. All comments are accessible at the following link:

http://www.dep.state.fl.us/air/eproducts/apds/listpermits.asp

Changes to the permit resulting from the comments are shown below in strikeout (strikeout) and double underline (double underline) formats for deletions and additions respectively.

1. CONTROL TECHNOLOGY

Section III - Condition B.1:

Comment

Brevard Energy (BE) states that H₂S Continuous Monitoring System (CMS) equipment has not, as of yet, been installed and that the purchase and configuration of the H₂S CMS is dependant on approval of the Draft Permit. BE adds that the monitor will measure the H₂S concentration of the landfill gas (LFG) fuel after the treatment system but will not dry the LFG fuel gas stream (beyond that which is provided by the dewatering treatment system) prior to measurement. BE also requests to clarify the frequency for the H₂S monitor performance evaluation specified in this condition.

BE requests the following changes to Condition B.1.

 H_2S Continuous Monitoring System (CMS) Equipment: Within 120 days of permit approval, \underline{tT} he permittee shall install a H_2S Continuous Monitoring System (CMS) to continuously monitor and record the concentration (dry basis) of H_2S in the landfill gas before being burned in any engine at the Brevard Energy facility Center. The CMS shall be calibrated, maintained, and operated according to the manufacturer specifications.

The landfill gas may be monitored at only one location if monitoring at this location accurately represents the concentration of H₂S in the fuel gas being burned. The applicant shall notify the District of the location and this location shall be part of this permit.

Within 90 days of initial startup of the H₂S CMS (or startup of any new or replacement continuous H₂S monitoring unit), the performance evaluations for this H₂S monitor shall be done using Performance Specification 7. EPA Methods 11, 15, 15A, or 16 shall be used for conducting the relative accuracy evaluations.

The span value for this instrument is 1000 ppmvd H₂S.

Response

The Department will provide the permittee 90 days after permit approval to install the H_2S CMS and 30 days to conduct performance evaluation of the H_2S CMS after the initial startup of the monitor. Performance Specification 7 in the applicability section 1.2.1 states that this specification is to be used for evaluating the acceptability of H_2S monitor at the time of or soon after installation. The Department believes that 90 days is adequate for the installation of the H_2S CMS as the permittee was made aware of this requirement very early in the permitting process. The permittee can request an extension for an additional 30 days for the installation of the H_2S CMS by submitting a written request to the Central District Office. The Department believes that 30 days are reasonable for conducting the performance evaluation of the monitor after the initial startup of the unit. The Department will grant the permittee's other requests for Condition B.1. Therefore, Condition B.1 will be modified as follows:

H₂S Continuous Monitoring System (CMS) Equipment: Within 90 days of permit approval, the permittee shall install a H₂S Continuous Monitoring System (CMS) to continuously monitor and record the concentration (dry basis) of H₂S in the landfill gas before being burned in any engine at the Brevard Energy facility Center. The permittee can request a 30 days extension for the installation of the H₂S CMS by submitting the written request to the Department's Central District Office. The request shall document the reasons for the extension. The CMS shall be calibrated, maintained, and operated according to the manufacturer specifications.

The landfill gas may be monitored at only one location if monitoring at this location accurately represents the concentration of H_2S in the fuel gas being burned. The applicant shall notify the District of the location and this location shall be part of this permit.

Within 30 days of initial startup of the H_2S CMS (or startup of any new or replacement continuous H_2S monitoring unit), <u>t</u>The performance evaluations for this H_2S monitor shall be done using Performance Specification 7. EPA Methods 11, 15, 15A, or 16 shall be used for conducting the relative accuracy evaluations.

The span value for this instrument is 1000 ppmvd H₂S.

2. EMISSION AND PERFORMANCE REQUIREMENTS

Section III - Condition D.8:

Comment

BE states that the H_2S CMS will electronically store concentration data as one-minute averages that can be downloaded to a computer and averaged over discrete time periods. BE requests the following clarification to the H_2S concentration weekly averaging procedures specified in Condition D.8.

BE requests the following change to Condition D.8.

Hydrogen Sulfide (H₂S): The concentration of H_2S from in the treated landfill gas used as fuel in the engines shall not exceed 455 ppmv on a weekly rolling average, calculated on a calendar day basis, nor shall it exceed 550 ppmv on a 24-hour rolling average basis, calculated on an hourly basis. The concentration of H_2S shall be measured by the continuous monitoring system.

Response

The Department agrees and this condition will be modified as requested.

3. TEST METHODS AND PROCEDURES

Section III - Condition E.2:

Comment

BE requests to include EPA Reference Method 6C or 19 along with Method 6 for SO₂ Determinations in condition E.2 below:

Annual and Initial Tests: Initial (I), Annual (A) and permit renewal (R) compliance tests shall be performed in accordance with the following reference methods as described in 40 CFR 60, Appendix A and 40 CFR 51 Appendix M, adopted by reference in Chapter 62-204.800, F.A.C. Initial, annual and renewal compliance tests shall be conducted on only one of the six engines. A different engine shall be tested each year such that all engines are tested during the six-year cycle.

- (a) through (e). No change
- (f) EPA Method 5, 201 or a combined Method 5/202 as an alternate test method Determination of PM_{10} Emissions (I, A).
- (g) EPA Reference Method 6, 6C or 19 Determinations of SO₂ Emissions (I, A).

EPA Methods 1 through 4 shall be used as necessary to support other test methods. No other test methods may be used for compliance testing unless prior DEP approval is received, in writing, from the Department.

<u>Response</u>

The Department agrees and this condition will be modified as requested.

Section III - Condition E.3:

Comment

BE requests that the requirement to measure LFG sulfur content on a semi-annual basis, as specified in Condition E.3.a., be voided once the CMS system is installed and operational. BE also requests that the requirement to calculate an emission factor in terms of equivalence be removed from this section since the ppmvd is not applicable to this type of analysis.

BE recommends adding the new language to condition E.3.a as indicated below:

Sulfur and Chlorine Content Gas Analysis: The permittee shall comply with the following requirements to monitor the sulfur and chlorine content of the landfill gas:

- (a) The permittee shall sample and analyze the landfill gas for sulfur as H₂S and chlorine content. The gas sample collected for the analyses shall be a composite sample and collected under normal operating conditions (i.e., with valves open for all operating cells). The gas sample collection and analyses for sulfur as H₂S and chlorine content shall be done semi-annually. Based on the sampling results and Rule 62-297.310(7)(b), F.A.C., the Department may request additional gas sampling and analyses. Results shall be reported as SO₂ and HCl emission factors-in terms of lb/MMscf (equivalence in ppmvd) and lb/MMBtu of landfill gas. Landfill gas sulfur (as H₂S) sampling and analysis under this condition shall no longer be required once the CMS equipment specified in Condition B.1 is installed and operational.
- (b) through (d) no change

<u>Response</u>

The Department will still require the sampling and analysis of the composite sample of the landfill gas for an additional one year period after the installation of the H_2S CMS. The permittee will have to submit two semi-annual composite sample analyses results. The Department can then compare those results with the H_2S CMS results to see if consistency exists between the two analyses. Therefore Condition E.3.a will be modified as follows:

Sulfur and Chlorine Content Gas Analysis: The permittee shall comply with the following requirements to monitor the sulfur and chlorine content of the landfill gas:

- (a) The permittee shall sample and analyze the landfill gas for sulfur as H₂S and chlorine content. The gas sample collected for the analyses shall be a composite sample and collected under normal operating conditions (i.e., with valves open for all operating cells). The gas sample collection and analyses for sulfur as H₂S and chlorine content shall be done semi-annually. Landfill gas sulfur (as H₂S) sampling and analysis under this condition shall be required for one year period (two semi-annual analyses) once the CMS equipment specified in Condition B.1 is installed and operational. Based on the sampling results and Rule 62-297.310(7)(b), F.A.C., the Department may request additional gas sampling and analyses. Results shall be reported as SO₂ and HCl emission factors-in terms of lb/MMscf (equivalence in ppmvd) and lb/MMBtu of landfill gas.
- (b) through (d). no change

4. RECORKEEPING, REPORTING AND MONITORING REQUIREMENTS

Section III - Condition F.4:

Comment

BE states that the reference to dry H₂S concentration (ppmvd) measurements should be removed from Condition F.2.d. BE rationale is included in comment 1 and 3 above.

Reports and Records: The permittee shall maintain the following reports and records on a monthly basis:

- (a) through (c). No change
- (d) Exceedances of the allowed H₂S ppmvd concentrations:

No change proposed to the rest of the condition.

Response

The Department agrees and this condition will be modified as requested.

CONCLUSION

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



Florida Department of Environmental Protection

Bob Martinez Center 2600 Blairstone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor Jeff Kottkamp Lt. Governor Michael W. Sole Secretary

PERMITTEE:

Brevard Energy, LLC 29261 Wall Street Wixom, Michigan 48393

Secondary Responsible Official (Energy Section): Mr. Scott Salisbury, Managing Member

Primary Responsible Official (Brevard County Solid Waste Management Central Disposal Facility):

Mr. Euripides Rodriguez, Director
Solid Waste Management Department – Brevard County

File No. 0090069-006-AC Permit No. PSD-FL-378A

SIC No. 4953

Expires:

Project: Brevard County Solid Waste

Management Central Disposal Facility SO₂ Permit Limit

Modification Landfill Gas Engines

March 1, 2010

PROJECT AND LOCATION:

This permit is to set sulfur dioxide (SO₂) best available control technology (BACT) emissions limit for the already permitted six (6) Caterpillar, Model G3520C, 2,233 brake-horsepower landfill gas-fired engines. This permit modification will also address compliance demonstration requirements specified in the permit for determination of particulate matter with a mean diameter equal to or less than 10 microns (PM₁₀) emissions and delete references to applicability of 40 Code of Federal Regulations (CFR) Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. The engines will generate up to a total of 9.6 megawatts (nominal rating) of electricity. The project is located at the Brevard County Solid Waste Management Central Disposal Facility at 2250 Adamson Road, Cocoa, Brevard County. UTM coordinates are Zone 17; 516.75 km E; 3140.57 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

ATTACHMENTS MADE A PART OF THIS PERMIT:

Appendix BD

BACT Determination

Appendix GC

Construction Permit General Conditions

Memorandum

Alternate Testing Procedure

Joseph Kakn, Director

Effecti

Division of Air Resource Management

SECTION I – FACILITY INFORMATION

FACILITY DESCRIPTION

Brevard County Solid Waste Management Central Disposal Facility (Central Disposal Facility) operates a municipal solid waste (MSW) landfill in Cocoa, Brevard County which is allocated for Class I MSW. Methane-rich landfill gas produced from the decomposition of disposed waste materials is being collected by a gas recovery system. Brevard Energy, LLC operates an electrical generation plant at the Central Disposal Facility. The collected gas is currently being diverted either to the flaring system or the landfill gas-fired engines for control. In order to reduce the amount of landfill gas (LFG) wasted by flaring, all available LFG from the landfill will be supplied to Brevard Energy, LLC for use as fuel to power the proposed internal combustion (IC) engine electrical generation plant. As a result of these changes, significant emission increases will occur for carbon monoxide (CO), particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀), nitrogen oxides (NOx) and sulfur dioxide (SO₂).

REGULATORY CLASSIFICATION

The Central Disposal Facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), SO₂, NOx, CO, or volatile organic compounds (VOC) exceed 100 tons per year (TPY). The landfill facility is also classified as a Title V source since the design capacity of the landfill is greater than 2.5 million cubic meters by volume or 2.5 million megagrams by mass.

The facility is subject to the following regulations:

- 40 CFR 60, Subpart A, General Provisions:
- 40 CFR 60, Subpart WWW, New Source Performance Standards (NSPS) for Municipal Solid Waste Landfills;
- 40 CFR 63, Subpart A, General Provisions; and
- 40 CFR 63, Subpart AAAA, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste Landfills.

The proposed landfill gas-fueled IC engine electrical generation plant are subject to the Prevention of Significant Deterioration (PSD) review with respect to Rule 62-210.200, F.A.C., due to its potential CO emissions being greater than 250 TPY. Best Available Control Technology (BACT) determinations for CO, NOx and PM₁₀ were set during the review of the original permit PSD-FL-378. For this project, the permit will specify BACT emissions standards for SO₂ only.

RELEVANT DOCUMENTS:

The permit revision request and additional information received to make it complete are not a part of this permit revision; however, the information is listed in the technical evaluation which is issued concurrently with this permit revision.

SECTION II – EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

- Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department's Central District Office, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767. All applications for permits to construct or modify emissions unit(s) subject to the Prevention of Significant Deterioration or Nonattainment (NA) review requirements should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).
- 2. <u>General Conditions</u>: The owner and operator are subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- 3. <u>Terminology</u>: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
- 4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit 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 Florida Administrative Code Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Parts 60 and 63, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
- 5. Expiration: The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the Department's Central District Office of any delays in completion of the project which would affect the startup day by more than 90 days. [Rule 62-4.090, F.A.C]
- 6. <u>Title V Permit</u>: This permit authorizes construction of the permitted emissions unit and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emission units. The permittee shall apply for and obtain a Title V operation permit in accordance with Rule 62-213.420, F.A.C. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Bureau of Air Regulation and a copy to the Compliance Authority.
 - [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]
- 7. Source Obligation: Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between constructions of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit. [Rule 62-212.400(12)(a), F.A.C.].
- 8. <u>BACT Determination</u>: For phased construction projects, the determination of best available control technology shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the applicable stationary source may be required to demonstrate the adequacy of any previous determination of best available control technology for the source. [40 CFR 52.21(j)(4)]
- 9. <u>Annual Reports</u>: Pursuant to Rule 62-210.370(3), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports using DEP Form 62-210.900(4) shall be sent to the DEP's Central District office by April 1st of each year.

SECTION II – EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

- 10. <u>Stack Testing Facilities</u>: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.
- 11. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

SECTION III - EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION A. SPECIFIC CONDITIONS

The Specific Conditions listed in this section apply to the following emission units:

EMISSION UNIT No.	EMISSION UNIT DESCRIPTION	
004 - 009	Six Caterpillar Model G3520C landfill gas-fueled internal combustion engines and electrical generators. Each engine has a power generation rating of 2,233 brake horsepower at 100 percent load. The generator has a power output rating of 1,600 kilowatt. The engines will be fueled exclusively with landfill gas (LFG) generated by and received from the Central Disposal Facility. The landfill gas will go through a gas treatment system prior to combustion in the engines.	

A. ADMINISTRATIVE PERFORMANCE REQUIREMENTS

Relation to Other Permits: The conditions of this permit subsection revises allowable limits for SO₂, modifies permit compliance demonstrations for PM₁₀ and deletes references to the applicability of 40 CFR 63, Subpart ZZZZ requirements. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of Permit PSD-FL-378, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc.

[Rule 62-4.070(3), F.A.C.]

{Permitting note: This permit retains the same numeration and format as the original Permit PSD-FL-378}

B. CONTROL TECHNOLOGY

1. <u>H₂S Continuous Monitoring System (CMS) Equipment</u>: Within 90 days of permit approval, the permittee shall install a H₂S Continuous Monitoring System (CMS) to continuously monitor and record the concentration of H₂S in the landfill gas before being burned in any engine at the Brevard Energy facility. The permittee can request a 30 days extension for the installation of the H₂S CMS by submitting the written request to the Department's Central District Office. The request shall document the reasons for the extension. The CMS shall be calibrated, maintained, and operated according to the manufacturer specifications.

The landfill gas may be monitored at only one location if monitoring at this location accurately represents the concentration of H_2S in the fuel gas being burned. The applicant shall notify the District of the location and this location shall be part of this permit.

Within 30 days of initial startup of H_2S CMS (or startup of any new or replacement continuous H_2S monitoring unit), the performance evaluations for this H_2S monitor shall be done using Performance Specification 7. EPA Methods 11, 15, 15A, or 16 shall be used for conducting the relative accuracy evaluations.

The span value for this instrument is 1000 ppmv H₂S.

[Design; Rules 62-210.200(BACT) and 62-4.070(3), F.A.C.]

C. FUEL SPECIFICATIONS AND WORK PRACTICES

3. NSPS and NESHAP Requirements: Emissions Units Nos. 004-009 are subject to 40 CFR 60 Subpart WWW and certain sections of 40 CFR 63 Subparts AAAA adopted by the Department at Rule 62-204.800(8)(b) and 62-204.800(11)(b), F.A.C.

[Rules 62-204.800 and 62-210.300, F.A.C., and Original Permit Condition III.A.3]

SECTION III - EMISSION UNIT(S) SPECIFIC CONDITIONS

D EMISSION AND PERFORMANCE REQUIREMENTS

6. <u>Sulfur Dioxide (SO₂):</u> The emission rate of SO₂ from each engine/generator set shall not exceed 2.64 lb/hr and 11.55 tons/year (TPY). The total SO₂ emissions from the six engines shall not exceed 69.3 TPY.

[Rule 62-212.400, F.A.C., Original Permit Condition III.B. 6]

8. <u>Hydrogen Sulfide (H₂S)</u>: The concentration of H₂S in the treated landfill gas used as fuel in the engines shall not exceed 455 ppmv on a weekly rolling average, calculated on a calendar day basis, nor shall it exceed 550 ppmv on a 24-hour rolling average basis, calculated on an hourly basis. The concentration of H₂S shall be measured by the continuous monitoring system.

[Rules 62-212.400 and 62-4.070(3), F.A.C.]

E TEST METHODS AND PROCEDURES

- 2. <u>Initial and Annual Tests</u>: Initial (I), Annual (A) and permit renewal (R) compliance tests shall be performed in accordance with the following reference methods as described in 40 CFR 60, Appendix A and 40 CFR 51 Appendix M, adopted by reference in Chapter 62-204.800, F.A.C. Initial, annual and renewal compliance tests shall be conducted on only one of the six engines. A different engine shall be tested each year such that all engines are tested during the six-year cycle.
 - (a) through (e). No change
 - (f) EPA Method 5, 201 or a combined Method 5/202 as an alternate test method Determinations of PM₁₀ Emissions (I, A).
 - (g) EPA Reference Method 6, 6C or 19 Determinations of SO₂ Emissions (I, A).

EPA Methods 1 through 4 shall be used as necessary to support other test methods. No other test methods may be used for compliance testing unless prior DEP approval is received, in writing, from the Department.

[Rule 62-297.310(7), F.A.C. and FDEP Emissions Monitoring Section Memo dated February 4, 2008; Original Permit Condition III.C. 2]

- 3. <u>Sulfur and Chlorine Content Gas Analysis</u>: The permittee shall comply with the following requirements to monitor the sulfur and chlorine content of the landfill gas:
 - (a) The permittee shall sample and analyze the landfill gas for sulfur as H₂S and chlorine content. The gas sample collected for the analyses shall be a composite sample and collected under normal operating conditions (i.e., with valves open for all operating cells). The gas sample collection and analyses for chlorine content shall be done semi-annually. Landfill gas sulfur (as H₂S) sampling and analysis under this condition shall be required for one year period (two semi-annual analyses) once the CMS equipment specified in Condition B.1 is installed and operational. Based on the sampling results and Rule 62-297.310(7)(b), F.A.C., the Department may request additional gas sampling and analyses. Results shall be reported as SO₂ and HCl emission factors-in terms of lb/MMscf (equivalence in ppmv) and lb/MMBtu of landfill gas.
 - (b) through (d). no change.

[Rule 62-297.310(7), F.A.C.; Original Permit Condition III.C. 3]

F RECORKEEPING, REPORTING AND MONITORING REQUIREMENTS

- 4. Reports and Records: The permittee shall maintain the following reports and records on a monthly basis:
 - (a) through (c). No change
 - (d) Exceedances of the allowed H₂S ppmv concentrations:
 - The date that the exceedance occurred;
 - An explanation of the exceedance;

AIR CONSTRUCTION PERMIT 0090069-006-AC, PSD-FL-378A

SECTION III - EMISSION UNIT(S) SPECIFIC CONDITIONS

- A description of the action taken, if any.
- For any periods for which monitoring data are not available, any changes made in operation of the CMS system during the period of data unavailability which could affect the ability of the system to meet the applicable H₂S limit. Operations of the CMS system and affected facility during periods of data unavailability are to be compared with operation of the CMS system and affected facility before and following the period of data unavailability.
- A written statement, signed by a responsible official, certifying the accuracy and completeness of the information contained in the report.

[Rules 62-4.070(3) and 62-210.200(BACT), F.A.C.; Original Permit Condition III.D. 4]

APPENDIX BD BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

Brevard Energy, LLC Brevard County Solid Waste Management Central Disposal Facility PSD-FL-378A/0090069-006-AC Cocoa, Brevard County

Brevard Energy, LLC has applied to modify the original prevention of significant deterioration (PSD) permit for Brevard County Solid Waste Management Central Disposal Facility (Central Disposal Facility). This project will establish a Best Available Control Technology (BACT) emission limit for sulfur dioxide (SO₂). Total emissions from the facility will not exceed 69 tons per year (TPY). Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

The facility consists of six (6) lean-burn internal combustion (IC) Caterpillar (CAT) Model G3520C engines and electrical generators. The electrical generation plant also consists of landfill gas (LFG) treatment equipment (gas dewatering, filtration and compression equipment and processes) and ancillary equipment that supports the electrical generation operations (e.g., engine oil storage tanks and LFG temperature and moisture conditioning equipment).

The six lean-burn IC engines are connected to individual electrical generators. Each gas IC engine will be connected to a 1,600 kilowatt electrical generator. The plant have the potential to generate 9.6 megawatts of electricity under base load operating conditions and will be interconnected to the Florida Power & Light distribution network through a nearby power line.

The LFG-fueled IC engines are housed in a single building constructed near the existing LFG collection system header and control system flare. A gas transmission line is connected to the header of the existing LFG collection system and a dedicated gas blower/compressor is used to draw methane-rich gas (fuel) from the existing LFG collection system to the proposed electrical generation plant.

The Central Disposal Facility is a major source of air pollution or a Title V source based on Rule 62-210.200(184), Florida Administrative Code (F.A.C.) and a major PSD source because the project, as originally proposed, have potential emissions of carbon monoxide (CO) greater than 250 tons per year (TPY) making the facility a Major Stationary Source for Prevention of Significant Deterioration (PSD). A Best Available Control Technology (BACT) determination was conducted in the original PSD permit for CO, nitrogen oxide (NOx) and particulate matter less than or equal to 10 microns (PM₁₀) by Rule 62-210.200(39), F.A.C. During the review of the original project, conditions were set in the permit to evaluate the concentrations of hydrogen sulfide (H₂S) in the landfill gas and therefore the SO₂ emissions from the turbines. The results of the tests showed that SO₂ is also above the PSD significant level of 40 TPY.

Descriptions of the process, project, BACT determination, air quality effects, and rule applicability are given in the Technical Evaluation and Preliminary Determination, accompanying the Department's Intent to Issue.

APPENDIX BD BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

The Department specifies the following as SO₂ BACT emission limit for each engine:

POLLUTANT	EMISSION LIMIT*	CONTROL TECHNOLOGY
SO ₂	2.64 lb/hr and 11.55 TPY	Good combustion practices

Compliance with the emission limits shall be in accordance with the EPA Reference Method 6 as contained in 40 CFR 60, Appendix A or as otherwise approved by the Department:

The Department is also requiring the installation of a continuous monitoring system for the measurement of the concentration of H_2S from the landfill gas. The permit contains condition limiting the concentration of H_2S from the landfill gas on a short-term and long-term basis.

Memorandum

TO:

Al Linero, Special Projects Administrator

Bureau of Air Regulation

THROUGH:

Errin Pichard, P.E., Administrator

Emissions Monitoring Section

FROM:

Michael Pacione, Environmental Specialist II

Emissions Monitoring Section

DATE:

February 4, 2008

SUBJECT:

Alternate testing procedure for Brevard County Solid Waste Management

We have received the request for an alternate sampling procedure submitted by Brevard County Solid Waste Management as part of a construction permit application. The permit application is for the Central Disposal Facility located in Cocoa, Florida, which houses six landfill gas-fired engines designated as Units 004 - 009. This Petitioner has requested approval to use a combination sample train of EPA Methods 5 and 202 in lieu of EPA Method 201 to determine compliance with the PM10 standard. This permit modification has been requested as the Petitioner wishes to use a combination of EPA Methods 5 and 202 on a permanent basis at this facility for PM10 measurements

As justification for discontinuing the use of EPA Method 201 at this facility, Brevard County has cited the size of the Method 201 cyclone sampling apparatus relative to the units' exhaust stack diameters (maximum 18 inches), elevated exhaust stack gas temperature (in excess of 900°F), and high exhaust gas moisture content (approximately 13 percent). These factors will make the application of EPA Method 201 undesirable for these landfill gas-fired engines. It is generally accepted that a combination of EPA Methods 5 and 202 is as accurate as, and possibly much more conservative than, EPA Method 201 in measuring PM10 emissions, especially considering that the facility proposes to count all of the filterable and condensible particulates that are collected as PM10. In Method 201, it is stated "for establishing source contributions to ambient levels of PM10, such as for emission inventory purposes, EPA suggests that source PM10 measurement include both in-stack PM10 and condensible emissions. Condensible emissions may be measured by an impinger analysis in combination with this method."

I recommend approval of this request by incorporating the alternate sampling procedure into the current permit revision for Brevard County Solid Waste Management's Central Disposal Facility. If you have any questions, please call me at 921-9511/

MP/

APPENDIX GC GENERAL CONDITIONS

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

APPENDIX GC GENERAL CONDITIONS

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
 - a) Determination of Best Available Control Technology (X)
 - b) Determination of Prevention of Significant Deterioration (X);
 - c) Compliance with New Source Performance Standards (X). Subpart WWW requirements and
 - d) Compliance with National Emission Standards for Hazardous Air Pollutants (). Subpart AAAA requirements
- G.14 The permittee shall comply with the following:
 - a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

From:

Livingston, Sylvia

Sent: Tuesday, March 17, 2009 3:00 PM
To: 'scott.salisbury@landfillenergy.com'

Cc: 'euripides.rodriguez@brevardcounty.us'; 'forney.kathleen@epamail.epa.gov';

'dee_morse@nps.gov'; Bradner, James; 'jeff.pope@us.bureauveritas.com';

'dderenzo@derenzo.com'; 'rharvey@derenzo.com'; Gibson, Victoria; Heron, Teresa; Arif,

Syed; Walker, Elizabeth (AIR)

Subject: BREVARD CO BOARD OF COUNTY COMMISSIONERS - BREVARD CO CENTRAL

DISPOSAL FACILITY; 0090069-006-AC/ PSD-FL-378A

Attachments: 0090069-006-AC_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

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Owner/Company Name: BREVARD CO BOARD OF COUNTY COMMISSIONERS

Facility Name: BREVARD CO CENTRAL DISPOSAL FACILITY

Project Number: 0090069-006-AC/ PSD-FL-378A

Permit Status: FINAL

Permit Activity: CONSTRUCTION

Facility County: BREVARD

Processor: Teresa Heron/ Syed Arif

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Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

From:

Scott Salisbury [Scott.salisbury@landfillenergy.com]

Sent:

Wednesday, March 18, 2009 10:31 AM

To:

Livingston, Sylvia

Subject:

RE: BREVARD CO BOARD OF COUNTY COMMISSIONERS - BREVARD CO CENTRAL

DISPOSAL FACILITY; 0090069-006-AC/ PSD-FL-378A

Confirming we can open these.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]

Sent: Tuesday, March 17, 2009 3:00 PM

To: Scott Salisbury

Cc: euripides.rodriguez@brevardcounty.us; forney.kathleen@epamail.epa.gov; dee_morse@nps.gov; Bradner, James; jeff.pope@us.bureauveritas.com; dderenzo@derenzo.com; rharvey@derenzo.com; Gibson, Victoria; Heron, Teresa; Arif, Cond. Welliam, Gibson, Victoria; Heron, Cond. Welliam, Con

Syed; Walker, Elizabeth (AIR)

Subject: BREVARD CO BOARD OF COUNTY COMMISSIONERS - BREVARD CO CENTRAL DISPOSAL FACILITY; 0090069-

006-AC/ PSD-FL-378A

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From:

Rodriguez, Euripides [Euripides.Rodriguez@brevardcounty.us]

Sent:

Wednesday, March 18, 2009 2:22 PM

To:

Livingston, Sylvia

Subject:

RE: BREVARD CO BOARD OF COUNTY COMMISSIONERS - BREVARD CO CENTRAL

DISPOSAL FACILITY: 0090069-006-AC/ PSD-FL-378A

Received. Thanks!

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]

Sent: Tuesday, March 17, 2009 3:00 PM **To:** scott.salisbury@landfillenergy.com

Cc: Rodriguez, Euripides; forney.kathleen@epamail.epa.gov; dee_morse@nps.gov; Bradner, James;

jeff.pope@us.bureauveritas.com; dderenzo@derenzo.com; rharvey@derenzo.com; Gibson, Victoria; Heron, Teresa; Arif,

Syed; Walker, Elizabeth (AIR)

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From: Sent: David Derenzo [dderenzo@derenzo.com] Tuesday, March 17, 2009 4:44 PM

To:

Livingston, Sylvia

Subject:

RE: BREVARD CO BOARD OF COUNTY COMMISSIONERS - BREVARD CO CENTRAL

DISPOSAL FACILITY; 0090069-006-AC/ PSD-FL-378A

David Derenzo Derenzo and Associates, Inc. (734) 216-4614

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]

Sent: Tuesday, March 17, 2009 3:00 PM **To:** scott.salisbury@landfillenergy.com

Cc: euripides.rodriguez@brevardcounty.us; forney.kathleen@epamail.epa.gov; dee_morse@nps.gov; Bradner, James; jeff.pope@us.bureauveritas.com; dderenzo@derenzo.com; rharvey@derenzo.com; Gibson, Victoria; Heron, Teresa; Arif, Syed; Walker, Elizabeth (AIR)

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From:

Bradner, James

Sent:

Wednesday, March 18, 2009 1:20 PM

To:

Livingston, Sylvia

Subject:

RE: BREVARD CO BOARD OF COUNTY COMMISSIONERS - BREVARD CO CENTRAL

DISPOSAL FACILITY; 0090069-006-AC/ PSD-FL-378A

Received—thank you.

From: Livingston, Sylvia

Sent: Tuesday, March 17, 2009 3:00 PM **To:** 'scott.salisbury@landfillenergy.com'

Cc: 'euripides.rodriguez@brevardcounty.us'; 'forney.kathleen@epamail.epa.gov'; 'dee_morse@nps.gov'; Bradner, James; 'jeff.pope@us.bureauveritas.com'; 'dderenzo@derenzo.com'; 'rharvey@derenzo.com'; Gibson, Victoria; Heron, Teresa;

Arif, Syed; Walker, Elizabeth (AIR)

Subject: BREVARD CO BOARD OF COUNTY COMMISSIONERS - BREVARD CO CENTRAL DISPOSAL FACILITY; 0090069-

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