

Memorandum

Florida Department of Environmental Protection

TO: Jeff Koerner, Permitting and Compliance Section
FROM: Marilyn Koletzke, Permitting and Compliance Section
DATE: June 21, 2011
SUBJECT: Draft Air Construction Permit Modification No. 0090069-009-AC/ PSD-FL-378C
Draft/Proposed Title V Air Operation Permit No. 0090069-010-AV
Brevard County Solid Waste Management Central Disposal Facility
Title V Air Operation Permit Revision and Air Construction Permit Modification

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permits;
- Public Notice of Intent to Issue Air Permits;
- Statement of Basis;
- Draft/Proposed Title V Air Operation Permit;
- Draft Air Construction Permit Modification;
- Technical Evaluation and Preliminary Determination; and,
- P.E. Certification.

The draft air construction permit No. 0090069-009-AC (PSD-FL-378C) and draft/proposed Title V air operation permit No. 0090069-010-AV are for the Brevard County Solid Waste Management Central Disposal Facility. The Technical Evaluation of Preliminary Determination and Statement of Basis provide a summary of the project and the rationale for issuance.

This air construction permit modification revises the specific conditions of PSD-FL-378B for the emissions limit and compliance testing requirements for carbon monoxide (CO) and particulate matter with an aerodynamic diameter of less than 10 micrometers (PM₁₀) for the landfill gas-fired engines. The project revises the BACT determinations for these pollutants based on current technological information.

The application was received on November 15, 2010. A request for additional information (RAI) letter was issued on December 27, 2010. A response was received on March 28, 2011. Day 90 is June 26th, 2011. There is no ongoing/open enforcement case for this facility, as advised by the Central District Office.

I recommend your approval of the attached revised Title V air operation permit and the draft air construction permit modification.

Attachments

JFK/mk



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronic Mail – Received Receipt Requested.

Mr. Scott Salisbury, Managing Member
Brevard Energy, LLC
29261 Wall Street
Wixom, Michigan 48393

Re: Draft Permit No. 0090069-009-AC (PSD-FL-378C), Air Construction Permit Modification
Draft/Proposed Permit No. 0090069-010-AV, Title V Air Operation Permit Revision
Brevard County Solid Waste Management Central Disposal Facility

Dear Mr. Salisbury:

Enclosed is the permit package for an air construction permit modification and a revised Title V air operation permit for the Brevard County Solid Waste Management Central Disposal Facility. This existing facility is located at 2250 Adamson Road, Cocoa, Brevard County. The permit package includes the following documents:

- The draft air construction permit modification and supporting technical evaluation and preliminary determination document.
- The statement of basis, which summarizes the facility, the equipment and the primary rule applicability for the Title V air operation permit.
- The draft/proposed revised Title V air operation permit, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permits provides important information regarding: the Permitting Authority's intent to issue air permits for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue air permits; the procedures for submitting comments on the draft/proposed permits; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permits 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. The Public Notice must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because this permit is being processed as a combined draft/proposed Title V permit revision in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the following address:
oquendo.ana@epamail.epa.gov.

If you have any questions, please contact the Project Engineer, Marilyn Koletzke, by telephone at (850) 717-9112 or by email at marilyn.koletzke@dep.state.fl.us.

Sincerely,

Jeffery F. Koerner, Program Administrator
Permitting and Compliance Section
Division of Air Resource Management

6-21-11

Date

Enclosures

JFK/mk

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

In the Matter of an Application for an Air Construction Permit Modification and a Revised Title V Air Operation Permit by:

Brevard Energy, LLC
29261 Wall Street
Wixom, Michigan 48393

Responsible Official:
Mr. Scott Salisbury, Managing Member

Draft Permit No. 0090069-009-AC/ (PSD-FL-378C)
Draft/Proposed Permit No. 0090069-010-AV
Facility ID No. 0090069
Brevard County Solid Waste Management Central
Disposal Facility
Brevard County, Florida

Facility Location: Brevard Energy, LLC operates the Brevard County Solid Waste Management Central Disposal Facility, which is located at 2250 Adamson Road, Cocoa, Brevard County, Florida.

Project: The purpose of this project is to issue an air construction permit modification and a revised Title V air operation permit for the facility. The air construction permit modification revises the specific conditions of PSD-FL-378B for the emissions limit and compliance testing requirements for carbon monoxide (CO) and particulate matter with an aerodynamic diameter of less than 10 micrometers (PM₁₀) for the landfill gas-fired engines. The project revises the Best Available Control Technology (BACT) determinations for these pollutants based on current technological information. The Title V air operation permit will be concurrently revised to incorporate these changes. Details of the project are provided in the application and the enclosed Technical Evaluation of Preliminary Determination and the Statement of Basis.

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.

Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

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 address indicated above for the Permitting Authority. The complete project file includes the draft/proposed permits, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permits by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. 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 Permits: The Permitting Authority gives notice of its intent to issue an air construction permit modification 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 air construction permit modification unless a timely petition for an administrative hearing is filed under Sections

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

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.

The Permitting Authority gives notice of its intent to issue a revised Title V air operation 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, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit revision unless a response received in accordance with the following procedures 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 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 the 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 air construction permit modification and draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly. If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permits, the Permitting Authority shall issue revised draft/proposed permits and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

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. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. 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. 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

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

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, and telephone number of the petitioner; the name, address and telephone 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 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.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: ouendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMITS

Executed in Tallahassee, Florida.

Jeffery F. Koerner
Jeffery F. Koerner, Program Administrator
Permitting and Compliance Section
Division of Air Resource Management

6-21-11
Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that either this Written Notice of Intent to Issue an Air Construction Permit and a Revised Title V Air Operation Permit (including the Public Notice, the Statement of Basis, the Draft/Proposed Permits and Technical Evaluation and Preliminary Determination), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 6-21-11 to the persons listed below.

- Mr. Scott Salisbury, Brevard Energy, LLC. (scott.salisbury@landfillenergy.com)
- Mr. Scott Stacy, Derenzo and Associates, Inc. ([sstacy@derenzo.com](mailto:ssstacy@derenzo.com))
- Mr. Rob Harvey, P.E., Derenzo and Associates, Inc (rharvey@derenzo.com)
- Ms. Caroline Shine, Central District Office (caroline.shine@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)
- Ms. Barbara Friday, DEP BAR (barbara.friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)

Clerk Stamp

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.

Barbara Friday 6-21-11
(Clerk) (Date)

P.E. CERTIFICATION STATEMENT

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

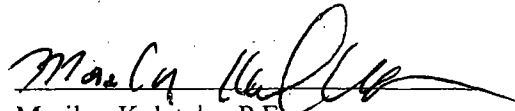
Draft Permit No. 0090069-009-AC/
(PSD-FL-378C)
0090069-010-AV (Concurrent
Revision)
Brevard County Solid Waste
Management Central Disposal Facility
Brevard County, Florida

PROJECT DESCRIPTION

The draft/proposed air construction permit modification No. 0090069-009-AC/ PSD-FL-378C and Title V air operation permit revision No. 0090069-010-AV are for the Brevard County Solid Waste Management Central Disposal Facility. The Statement of Basis provides a summary of the project and the rationale for issuance. The construction permit modification revises emissions limits and compliance testing requirements for carbon monoxide (CO) and particulate matter with an aerodynamic diameter of less than 10 micrometers (PM₁₀) for the landfill gas-fired engines. The project revises the BACT determinations for these pollutants based on current technological information.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is 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. The Department's full review of the project and rationale for issuing the revised draft/proposed permits is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).


Marilyn Koletzke, P.E.
Registration Number 50611

June 23, 2011
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE PERMITS

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft/Proposed Title V Air Operation Permit Revision No. 0090069-010-AV
Draft Air Construction Permit Modification Permit No. 0090069-009-AC (PSD-FL-378C)
Brevard County Solid Waste Management Central Disposal Facility
Brevard County, Florida

Applicant: The applicant for this project is Brevard Energy, LLC. The applicant's responsible official and mailing address are: Mr. Scott Salisbury, Managing Member, Brevard Energy, LLC, 29261 Wall Street, Wixom, Michigan 48393.

Facility Location: The applicant operates the existing Brevard County Solid Waste Management Central Disposal Facility, which is located at 2250 Adamson Road, Cocoa, Brevard County, Florida.

Project: The applicant applied on November 15, 2010 to the Department for an air construction permit modification and a revised Title V air operation permit. The Brevard County Solid Waste Management Central Disposal Facility (Central Disposal Facility) operates a Class I municipal solid waste (MSW) landfill in Cocoa, Brevard County. Landfill gas (LFG) is a product of the microbial decomposition of waste and is extracted by recovery wells that are located in both active and capped cells of the landfill. LFG is pretreated, dewatered, filtered, and compressed prior to being combusted in the six engines that power the electrical power generators.

The Draft/Proposed permits revise the maximum allowable carbon monoxide and particulate matter with an aerodynamic diameter of less than 10 micrometers emissions rate and compliance testing requirements. The project revises the Best Available Control Technology (BACT) determinations for these pollutants based on current technological information.

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 Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project.

Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

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 address indicated above for the Permitting Authority. The complete project file includes the draft air construction permit modification, the draft/proposed Title V air operation permit revision, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permits by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. 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 Air Permits: The Permitting Authority gives notice of its intent to issue an air construction permit modification 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

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE PERMITS

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 air construction permit modification 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.

The Permitting Authority gives notice of its intent to issue a Title V air operation permit revision to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of existing 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, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final Title V air operation permit in accordance with the conditions of the draft/proposed Title V air operation permit revision 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 draft air construction permit modification and draft/proposed Title V air operation permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly. If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely, received written comments or comments received at a public meeting result in a significant change to the draft/proposed permits, the Permitting Authority shall issue revised draft/proposed permits and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

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. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. 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. 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 and telephone number of the petitioner; the name address and telephone 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 rights will be affected by the agency determination; (c) A statement of when and how the 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

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE PERMITS

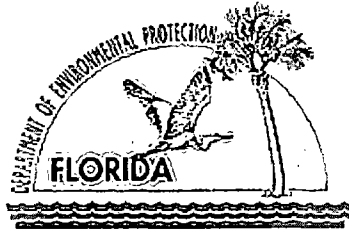
specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: ouendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Brevard Energy, LLC
29261 Wall Street
Wixom, Michigan 48393

Brevard County Solid Waste Management Central Disposal
Facility ID No. 0090069

PROJECT

Project No. 0090069-009AC / PSD-FL-378C
Draft Air Construction Permit Modification
Revision for CO/PM₁₀ Limits on the Landfill Gas Engines

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Permitting and Compliance Section
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

June 20, 2011

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, including determinations of Best Available Control Technology (BACT)); 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 Rules 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 on a quarterly basis 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

The Brevard County Solid Waste Management Central Disposal Facility (Central Disposal Facility) operates a Class I municipal solid waste (MSW) landfill in Cocoa, Brevard County. The Brevard County Solid Waste Management Central Disposal Facility is located at 2250 Adamson Road, Cocoa, Brevard County. The facility's universal transverse mercator (UTM) system coordinates are Zone 17; 516.75 kilometer (km) East; 3140.57 km North.

Landfill gas (LFG) is a product of the microbial decomposition of waste and is extracted by recovery wells that are located in both active and capped cells of the landfill. Brevard Energy operates an electrical generation plant that consists of six Caterpillar Model G3520C internal combustion engines and electrical generators that are fueled exclusively by LFG. Each engine has an energy output of 2,233 brake horsepower at 100% load and generates 1,600 kilowatt of power. The LFG recovered from the landfill well points is filtered, compressed and dewatered. After pretreatment, LFG is transferred through the collection system by the gas blower/compressor to the LFG engines for combustion. When the engines are off line for maintenance or the wells are providing LFG in excess of the capacity of the engines, residual LFG is diverted to the existing flare system for oxidization.

Facility Regulatory Categories

- 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 213, F.A.C.
- The facility is an existing major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility operates units subject to the following applicable New Source Performance Standards (NSPS) in Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60): Subpart A (General Provisions), and Subpart WWW (MSW Landfills).

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- The facility operates units subject to the following applicable National Emissions Standards for Hazardous Air Pollutants (NESHAP) in Title 40, Part 63 of the Code of Federal Regulations (40 CFR 63): Subpart A (General Provisions), Subpart AAAA (MSW Landfills) and Subpart ZZZZ (Reciprocating Internal Combustion Engines).

Project Description

The applicant requests a revision of the BACT emissions limits maximum allowable carbon monoxide (CO) and particulate matter with an aerodynamic diameter of less than 10 micrometers (PM₁₀) emissions rate. Based on experience with operating LFG-to-energy systems, the applicant proposes the following revisions:

- CO emission factor from 2.75 grams per brake horsepower hour (g/bhp-hr) CO to 3.3 g/bhp-hr.
- PM₁₀ emission factor from 0.24 g/bhp-hr to 0.29 g/bhp-hr.

Although the request will revise the original BACT determinations, it is not expected to result in an actual increase in emissions. The applicant requested a concurrent revision of the Title V air operation permit along with a revision to the original PSD air construction permit.

Processing Schedule

- November 15, 2010 Application received.
- December 27, 2010 Additional information requested.
- March 28, 2011 Additional information received.

2. PSD APPLICABILITY

The existing facility is an existing major stationary source. Construction of the LFG-to-energy plant was in accordance with original Permit No. PSD-FL-378. The proposed project requires a review of the original BACT determinations as well as an air quality modeling analysis for CO and PM₁₀ emissions.

3. DEPARTMENT REVIEW

Carbon Monoxide

Emissions data from Caterpillar indicates a not to exceed (NTE) CO emissions limit of 4.13 g/bhp-hr. Annual compliance tests conducted at the facility over the past three years report CO emission ranging between 2.23 and 2.40 g/bhp-hr. While these CO compliance test results are significantly less than the manufacturers NTE limit, variability in the LFG fuel methane content and engine maintenance cycles will have a significant impact on projected emissions in the future.

The original CO BACT determination was based on the engine design and good combustion practices (including maintenance). The Department is unaware of any new control equipment that would be cost effective. The LFG contains siloxanes, which are silica compounds that form glass-like deposits on the pistons, cylinders, valves, intake manifold and exhaust manifolds of the engine. These deposits degrade the performance of the engine and extensive maintenance is required to restore the combustion equipment to proper operation. As the engine performance degrades, it is difficult to maintain the engine tuned for low CO and NO_x emissions.

In support of this concept, the Department found a recent white paper report by the Bay Area Air Quality Management District (BAAQMD) titled, "Revisiting BACT for Lean-Burn Landfill Gas Fired Internal Combustion Engines" from February of 2009. The study discovered that the variability in engine combustion efficiency was not being accounted for since, "... *CO deterioration during the year is not typically detected nor limited*". Existing BACT emissions limits "achieved in practice" were based on once per year compliance tests. Such tests do not account for variability of emissions due to degraded engine performance resulting from siloxane deposits on combustion surfaces. In addition, existing BACT limits were "... *established based on early, limited source test data for digester gas fired engines ...*" and as such, are not appropriate for LFG combustion engines.

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Wastewater digester gas has higher methane content than LFG meaning that it also has a higher amount of energy per unit volume. The BAAQMD concluded that "... *Our discussions with waste gas engine operators leads us to believe that engines generally perform at their best after overhaul events and that combustion performance tends to deteriorate as siloxane deposits form throughout the combustion surfaces.*" The white paper concluded "... *it is apparent that:*

1. *it is normal for CO emissions to increase as the engines are operated, and*
2. *establishment of not to exceed limits based on a nominal rate of CO increase would seem to be a reasonable approach for these engines, and*
3. *additional monitoring is needed to ensure that the engines get needed maintenance in a timely fashion.*

Engine maintenance events may not have a significant impact on NOx emissions, but for landfill gas engines, regular maintenance is of paramount importance for minimizing CO emissions." The BAAQMD recommends a NTE emissions limit of 3.6 g/bhp-hr for low-CO biased engines.

The Department also agrees that additional flexibility with CO emissions is necessary to concurrently maintain and tune the engines for low NOx emissions. Therefore, the current CO BACT emission standards for each engine/generator set will be revised as follows:

- From 2.75 to 3.5 g/bhp-hr;
- From 13.54 to 17.2 lb/hour; and
- From 59.3 to 75.3 tons/year.

Particulate Matter

On occasion, the Department relies on the firing of clean fuels as BACT for PM₁₀ emissions (e.g., combustion turbines). Since LFG is not considered a "clean fuel", the original project based the PM₁₀ BACT determination on treating the LFG prior to combustion, which required a pretreatment system including: LFG compression (via blowers), liquids removal (via knock-out and chilling) and particle removal (via 1 micron primary and polishing filters). The Department notes that the new NSPS provisions in 40 CFR 60 for compression ignition engines (Subpart IIII) and for spark ignition engines (Subpart JJJJ) do not regulate particulate matter emissions. As specified in the NSPS Standards of Performance, Emission Guidelines and National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills:

"Landfills NSPS for filtration and de-watering, the refined proposed definitions contain specific numerical values that would provide long-term protection of the combustion equipment, which would support good combustion. For particulate matter filtration, a filter system would be required to have an absolute rating no greater than 10 microns. For dewatering, the system would be required to reduce the dew point by at least 20 degrees Fahrenheit."

The BAAQMD posted a June 17, 1999 internal memo titled "BACT Guideline for the Vasco Road Sanitary Landfill's Proposed Gas Turbine (Application #19620, Plant #5095)". This memo references another BACT determination by the South Coast Air Quality Management District (SCAQMD), which states:

"BACT for PM₁₀:

Only the SCAQMD has established BACT guidelines for landfill gas turbines. The SCAQMD BACT guideline specifies that, for landfill gas-fired turbines, fuel gas pretreatment for particulate removal have been "achieved in practice". Therefore, in the absence of any other BACT determinations, fuel gas pretreatment for particulate removal constitutes BACT for landfill gas-fired turbines."

Previous BACT determinations for particulate matter range from 0.039 to 1.52 g/bhp-hr. Florida's most recent draft BACT determination for a similar landfill gas engine (Waste Management, Inc. of Florida, Medley Landfill,

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Project No. 0250615-012-AC/ PSD-FL-414) was fuel pretreatment and good combustion practices resulting in an equivalent PM_{10} emission rate of 0.24 g/bhp-hr. Although initial stack tests for particulate matter emissions from new landfill gas engines have been very low (< 0.1 g/bhp-hr), subsequent tests on the same equipment tend to show higher emission levels with increased engine operating hours. Based on operating experience, Caterpillar, confirms an increase in particulate matter resulting from normal wear and tear on piston rings and seals. Therefore, the Department establishes the following work practice standards as the preliminary revised BACT determination for particulate matter from the engines:

- The permittee shall install, operate and maintain a landfill gas pretreatment system to dewater, compress and filter (1 micron and greater) the landfill gas prior to combustion in the engines.
- The permittee shall implement the following good combustion practices to minimize particulate matter emissions: lean-burn combustion design, efficient combustion through the air-fuel controller and preventive and periodic maintenance in accordance with any applicable requirements in NESHAP Subpart ZZZZ or 40 CFR 63.
- As determined by EPA Method 9, visible emissions from the landfill gas engines shall not exceed 10% opacity.

The above work practice standards should maintain PM_{10} emission rates at 0.24 g/bhp-hr or less.

Discussion of particulate matter with an aerodynamic diameter of less than 2.5 micrometers ($PM_{2.5}$) Emissions

The Department adopted by reference the federal ambient air quality standard for $PM_{2.5}$, but has not yet promulgated the implementing regulations for PSD preconstruction review (e.g., define $PM_{2.5}$ as a PSD pollutant with a significant emission rate for PSD applicability). The Department is in the process of completing a rulemaking action to implement this remaining piece of the $PM_{2.5}$ program. The draft permit revision and current permit include the following requirements, which address $PM_{2.5}$ emissions:

- Use of LFG as the only fuel;
- Requirement to pre-treat the LFG with filtration down to 1 micron prior to combustion;
- Sampling, analysis and reporting requirements to ensure that the project remains minor with respect to SO_2 emissions, which is a precursor of $PM_{2.5}$ emissions; and
- A NO_x standard of 0.6 g/bhp-hour (another precursor of $PM_{2.5}$ emissions), which is 80% below the applicable 2008 NSPS Subpart JJJJ limitation of 3.0 g/bhp-hour.

The Department believes that these techniques and limitations effectively minimize $PM_{2.5}$ emissions.

4. AIR QUALITY IMPACT ANALYSIS

This section provides a general overview of the modeling analyses required for PSD preconstruction review followed by the specific analyses required for this project.

Overview of the Required Modeling Analyses

Pursuant to Rule 62-212.400, F.A.C., the applicant is required to conduct the following analyses for each PSD significant pollutant:

- A preconstruction ambient air quality analysis,
- A source impact analysis based on EPA-approved models, and
- An additional impact analyses.

Preconstruction Ambient Monitoring Analysis

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Generally, the first step is to determine whether the Department will require preconstruction ambient air quality monitoring. Using an EPA-approved air quality model, the applicant must determine the predicted maximum ambient concentrations and compare the results with regulatory thresholds for preconstruction ambient monitoring, known as de minimis air quality levels. The regulations establish de minimis air quality levels for several PSD pollutants as shown in the following table. For ozone, there is no de minimis air quality level because it is not emitted directly. However, since nitrogen dioxide (NO₂) and volatile organic compounds (VOC) are considered precursors for ozone formation, the applicant may be required to perform an ambient impact analysis (including the gathering of ambient air quality data) for any net increase of 100 tons per year or more of nitrogen dioxide NO₂ or volatile organic compounds VOC emissions. Included in the PSD pollutants with de minimis air quality levels are; fluorides (Fl), hydrogen sulfide (H₂S), lead (Pb), mercury (Hg), reduced sulfur compounds (RSC), sulfur dioxide (SO₂), and total reduced sulfur (TRS).

If the predicted maximum ambient concentration is less than the corresponding de minimis air quality level, Rule 62-212.400(3)(e), F.A.C. exempts that pollutant from the preconstruction ambient monitoring analysis. If the predicted maximum ambient concentration is more than the corresponding de minimis air quality level (except for non-methane hydrocarbons), the applicant must provide an analysis of representative ambient air concentrations (pre-construction monitoring data) in the area of the project based on continuous air quality monitoring data for each such pollutant with an Ambient Air Quality Standard (AAQS). If no such standard exists, the analysis shall contain such air quality monitoring data as the Department determines is necessary to assess ambient air quality for that pollutant.

PSD Pollutant	De Minimis Air Quality Levels
CO	575 µg/m ³ , 8-hour average
NO ₂	14 µg/m ³ , annual average;
PM ₁₀	10 µg/m ³ , 24-hour average
SO ₂	13 µg/m ³ , 24-hour average
Pb	0.1 µg/m ³ , 3-month average
Fl	0.25 µg/m ³ , 24-hour average
TRS	10 µg/m ³ , 1-hour average
H ₂ S	0.2 µg/m ³ , 1-hour average
RSC	10 µg/m ³ , 1-hour average
Hg	0.25 µg/m ³ , 24-hour average

If preconstruction monitoring data is necessary, the Department may require the applicant to collect representative ambient monitoring data in specified locations prior to commencing construction on the project. Alternatively, the Department may allow the requirement for preconstruction monitoring data to be satisfied with data collected from the Department’s extensive ambient monitoring network. Preconstruction monitoring data must meet the requirements of Appendix B to 40 CFR 58 during the operation of the monitoring stations. The preconstruction monitoring data will be used to determine the appropriate ambient background concentrations to support any required AAQS analysis.

Finally, after completing the project, the Department may require the applicant to conduct post-construction ambient monitoring to evaluate actual impacts from the project on air quality.

Source Impact Analysis

For each PSD-significant pollutant identified above, the applicant is required to conduct a source impact analysis for affected PSD Class I and Class II areas. This analysis is to determine if emissions from this project will significantly impact levels established for Class I and II areas. Class I areas include protected federal parks and national wilderness areas (NWA) that are under the protection of federal land managers. The table identifies the Class I areas located in Florida or that are within

Class I Area	State	Federal Land Manger
Bradwell Bay NWA	Florida	U.S. Forest Service
Chassahowitzka NWA	Florida	U.S. Fish and Wildlife Service
Everglades National Park	Florida	National Park Service
Okefenokee NWA	Georgia	U.S. Fish and Wildlife Service
St. Marks NWA	Florida	U.S. Fish and Wildlife Service
Wolf Island NWA	Georgia	U.S. Fish and Wildlife Service

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200 kilometers in nearby states. Class II areas represent all other areas in the vicinity of the facility open to public access that are not Class I areas.

The Department is in the process of adopting Significant Emission Rates (SER), Significant Impact Levels (SIL) and AAQS for particulate matter with an aerodynamic diameter of less than 2.5 micrometers (PM_{2.5}). The Department extended the applicant's PM_{2.5} results with respect to the federal maximum 24-hour and annual impacts as discussed further below. In conducting this analysis, the applicant conservatively assumed that all PM₁₀ is actually PM_{2.5}. In addition, the Department scaled the SIL for PM₁₀ in proportion to the ratio of the respective national AAQS to develop SIL applicable to PM_{2.5}. The rationale for the SIL used for PM_{2.5} is as follows:

- The promulgated annual SIL for PM₁₀ is 2% of the corresponding state/national AAQS;
- The project-specific annual SIL for PM_{2.5} is also 2% of the corresponding AAQS;
- The promulgated 24-hour SIL for PM₁₀ is 3.3% of the state/national AAQS; and
- The project-specific SIL for PM_{2.5} is also 3.3% of the AAQS.

The Department believes this approach encompasses all meaningful PM_{2.5} sources capable of interacting with the project for the purposes of determining impacts with respect to the 24-hour and annual AAQS for PM_{2.5}.

An initial significant impact analysis is conducted using the worst-case emissions scenario for each pollutant and corresponding averaging time. The regulations define separate significant impact levels for Class I and Class II areas for CO, NO₂, Pb, PM₁₀, and SO₂. Based on the initial significant impact analysis, no additional modeling is required for any pollutant with a predicted ambient concentration less than the corresponding significant impact level. However, for any pollutant with a predicted ambient concentration exceeding the corresponding significant impact level, the applicant must conduct a full impact analysis. In addition to evaluating impacts caused by the project, a full impact modeling analysis also includes impacts from other nearby major sources (and any potentially-impacting minor sources within the radius of significant impact) as well to determine compliance with:

- The PSD increments and the federal air quality related values (AQRV) for Class I areas.
- The PSD increments and the AAQS for Class II areas.

As previously mentioned, for any net increase of 100 tons per year or more of VOC or NO₂ subject to PSD, the applicant may be required to perform an ambient impact analysis for ozone including the gathering of ambient ozone data.

PSD Class I and II Area Model

The EPA-approved American Meteorological Society and EPA Regulatory Model (AERMOD) dispersion model is used to evaluate short range impacts from the proposed project and other existing major sources. In November of 2005, the EPA promulgated AERMOD as the preferred regulatory model for predicting pollutant concentrations within 50 kilometers of a source. The AERMOD model is a replacement for the Industrial Source Complex Short-Term model (ISCST3). The AERMOD model calculates hourly concentrations based on hourly meteorological data. The model can predict pollutant concentrations for annual, 24-hour, 8-hour, 3-hour and 1-hour averaging periods. In addition to the PSD Class II modeling, it is also used to model the predicted impacts for comparison with the de minimis ambient air quality levels when determining preconstruction monitoring requirements.

For evaluating plume behavior within the building wake of structures, the AERMOD model incorporates the Plume Rise Enhancement (PRIME) downwash algorithm developed by the Electric Power Research Institute (EPRI). A series of specific model features recommended by the EPA are referred to as the regulatory options. The applicant used the EPA-recommended regulatory options in each modeling scenario and building downwash effects were evaluated for stacks below the good engineering practice (GEP) stack heights.

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Meteorological data used in the AERMOD model consisted of a concurrent five-year period of hourly surface weather observations from the National Weather Service office located at Orlando International Airport and twice-daily upper air soundings from Tampa International Airport. The five-year period of meteorological data was from 1999 through 2003. These stations were selected for use in the evaluation because they are the closest primary weather stations to the project area and are most representative of the project site.

Stack Height Considerations

GEP stack height means the greater of 65 meters (213 feet) or the maximum nearby building height plus 1.5 times the building height or width, whichever is less. Where the affected stacks did not meet the requirements for GEP stack height, building downwash was considered in the modeling analyses. Based on a review of this application, the Department determines that the project complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in *NRDC v. Thomas*, 838 F. 2d 1224 (D.C. Cir. 1988).

Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators.

Additional Impact Analysis

In addition to the above analyses, the applicant must provide an evaluation of impacts to: soils, vegetation, and wildlife; air quality related to general commercial, residential and industrial growth in the area that may result from the project. Additionally, the proposed project will be located 175 km from the closest portion of the nearest PSD Class I area, the Chassahowitzka NWA. Based on the Department's consultation with federal land manager and the applicant, no long range transport modeling was required for determining PSD Class I increment or regional haze impacts because of the distance to the nearest Class I area and the level of emissions.

PSD Significant Pollutants for the Project

As discussed previously, the proposed project will increase emissions of the following pollutants in excess of the PSD significant emissions rates: CO and PM₁₀. For the purposes of any required analysis, only PM₁₀ emissions will be considered when modeling particulate matter.

Preconstruction Ambient Monitoring Analysis

Using the AERMOD model, the applicant predicted the following maximum ambient impacts from the project.

De Minimis Air Quality Levels				
Pollutant	Averaging Time	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	De Minimis Concentration ($\mu\text{g}/\text{m}^3$)	Greater than De Minimis?
CO	8-hr	102	575	No
PM ₁₀	24-hr	5.2	10	No
PM _{2.5}	24-hr	5.2	2.3	Yes

As shown above, CO and PM₁₀ are exempt from preconstruction monitoring because the predicted impacts are less than the de minimis levels. However, PM_{2.5} is not exempt from preconstruction ambient monitoring. Nevertheless, the Department maintains an extensive quality-assured ambient monitoring network throughout the state. The following table summarizes PM₁₀/PM_{2.5} ambient data from 2008 to 2010 available for existing nearby monitoring locations.

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Representative Ambient Concentrations			
Pollutant	Averaging Time	Ambient Concentration	Monitor Location
PM ₁₀	Annual	16	Fay Park, Brevard County
	24-hour	74	
PM _{2.5}	Annual	8	Melbourne, Brevard County
	24-hour	22	

The existing monitoring data show no violations of any ambient air quality standards. The Department determines that the data collected from these monitors is representative of the air quality in the vicinity of the project and may be used to satisfy the preconstruction monitoring requirements for PM_{2.5}. As necessary, the above ambient concentrations will be used as the ambient background concentrations for any

required AAQS analysis, which as will be shown later will also include PM₁₀ emissions.

Source Impact Analysis for PSD Class I Areas

Affected PSD Class I Areas

For PSD Class I areas within 200 kilometers of the facility, the table identifies each affected Class I area as well as the distance to the facility and the number of receptors used in the modeling analysis. For the preliminary significant impact analysis, the highest short-term predicted concentrations will be compared to the significant impact levels.

PSD Class I Area	Distance	Receptors
Chassahowitzka NWA (CNWA)	175	5

Results of PSD Class I Significant Impact Analysis

The federal land manager waived the requirements to perform a Class I area significant impact analysis due to the distance to the Class I area and low-level emissions from the project. However, the United States Environmental Protection Agency requested that a test of receptors at 50 km in the direction of the Class I area be performed to verify that no particulate Class I area significant impact analysis would be required. Using the AERMOD model, the applicant predicted the following maximum ambient impacts from the project.

Significant Impact Analysis for PSD Class I Areas					
Pollutant	Averaging Time	Maximum Predicted Impact (µg/m ³)	Significant Impact Level (µg/m ³)	Significant Impact?	Affected Class I Area
PM ₁₀	Annual	0.006	0.2	No	CNWA
	24-hour	0.17	0.3	No	CNWA

As shown, the maximum predicted impacts are less than the corresponding significant impact levels for each pollutant. Therefore, a full impact analysis for the PSD Class I areas is not required.

Source Impact Analysis for PSD Class II Areas

For the preliminary significant impact analysis, the highest short-term predicted concentrations will be compared to the respective significant impact levels. Since five years of data are available, the highest-second-high (HSH) short-term predicted concentrations will be used for any required AAQS and PSD Class II increment analysis with regard to short-term averages. However, for annual averages, the highest predicted annual average will be compared with the corresponding annual level.

Results of the Significant Impact Analysis

The following table shows the results of the preliminary PSD Class II significant impact analysis.

Significant Impact Analysis for PSD Class II Areas (Vicinity of Facility)					
Pollutant	Averaging Time	Maximum Predicted Impact (µg/m ³)	Significant Impact Level (µg/m ³)	Significant Impact?	Radius of Significant Impact (km)

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CO	8-hr	84	500	No	None
	1-hr	143	2,000	No	None
PM ₁₀	Annual	0.5	1	No	None
	24-hr	5.2	5	Yes	0.7
PM _{2.5}	Annual	0.5	0.3	Yes	4
	24-hr	5.2	1.2	Yes	4

As shown above, the predicted impacts of CO are well below the corresponding PSD Class II significant impact level and no further analysis is required. The 24-hour PM₁₀ and the 24-hour and annual predicted impacts of PM_{2.5} are greater than the corresponding PSD Class II significant impact levels; therefore, a full impact analysis for these pollutants is required within the applicable significant impact area as defined by the predicted radius of significant impact identified above. For PM₁₀ emissions, a PSD Class II increment analysis and an AAQS analysis must be conducted. For PM_{2.5} only an AAQS analysis was necessary.

Receptor Grids for Performing PSD Increments and AAQS Analyses

For the PSD Class II increment and AAQS analyses, receptor grids are normally based on the size of the significant impact area for each pollutant.

PSD Class II Increment Analysis

The PSD increment represents the amount that new sources in an area may increase ambient ground level concentrations of a pollutant from a regulatory baseline concentration. For PM₁₀ the baseline concentrations were established in 1977 with a baseline year of 1975 for existing major sources. The emission values input into the model for predicting increment consumption are based on the maximum emissions rates from increment-consuming sources at the facility as well as all other increment-consuming sources in the vicinity of the facility. The following table summarizes the results of the PSD Class II increment analysis.

PSD Class II Increment Analysis				
Pollutant	Averaging Time	Maximum Predicted Impacts (µg/m ³)	Allowable Increment (µg/m ³)	Greater than PSD Class II Allowable Increment?
PM ₁₀	Annual	0.5	17	No
	24-hour	6	30	No

As shown above, the maximum predicted impacts are less than the allowable PSD Class II increments.

AAQS Analysis

For each pollutant subject to an AAQS analysis, the total impact on ambient air quality is obtained by adding an ambient background concentration to the maximum predicted concentration from modeled sources. The ambient background concentration accounts for all sources that are not explicitly modeled. The following table summarizes the results of the AAQS analysis for the affected pollutants.

AAQS Analysis						
Pollutant	Averaging Time	Modeled Sources (µg/m ³)	Ambient Background Concentration (µg/m ³)	Total Impact (µg/m ³)	AAQS (µg/m ³)	Greater than AAQS?
PM ₁₀	Annual	0.5	16	16.5	50	No
	24-hour	6	74	80	150	No
PM _{2.5}	Annual	0.5	8	8.5	15	No
	24-hour	6	22	28	35	No

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As shown in this table, impacts from the proposed project are not expected to cause or significantly contribute to a violation of any AAQS.

Additional Impacts Analysis

Impacts on Soils, Vegetation and Wildlife

The maximum predicted ground-level concentrations of CO and PM₁₀/PM_{2.5} from the proposed project and all other nearby sources are below the corresponding AAQS. The AAQS are designed to protect both the public health and welfare. As such, this project is not expected to have a harmful impact on soils, vegetation or wildlife in the vicinity of the project.

Air Quality Impacts Related to Growth

The proposed modification will not significantly change employment, population, housing, commercial development, or industrial development in the area to the extent that a significant air quality impact will result.

Conclusion on Air Quality Impacts

As described in this report and based on the required ambient impact analyses, the Department has reasonable assurance that the proposed project will not cause, or significantly contribute to, a violation of any AAQS or PSD increment.

5. 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 revised draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Marilyn Koletzke is the project engineer responsible for reviewing the application and drafting the permit. Cleve Holladay is the project meteorologist responsible for reviewing and summarizing the air quality analysis. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT MODIFICATION

PERMITTEE

Brevard Energy, LLC
29261 Wall Street
Wixom, Michigan 48393

Authorized Representative:
Mr. Scott Salisbury
Managing Member, Energy Section

Air Permit No. 0090069-009-AC
(PSD-FL-378C)
Permit Expires: June 20, 2012
Brevard County Solid Waste
Management Central Disposal Facility
Permit Limit Modification
Landfill Gas Engines

PROJECT

This is the final air construction permit, which modifies emissions limits and compliance testing requirements for carbon monoxide and particulate matter with an aerodynamic diameter of less than 10 micrometers for the landfill gas-fired engines. The Brevard County Solid Waste Management Central Disposal Facility is located at 2250 Adamson Road, Cocoa, Brevard County. The facility's universal transverse mercator (UTM) system coordinates are Zone 17; 516.75 kilometers East; 3140.57 kilometers North.

This final permit is organized into the following sections: Section 1 (General Information); and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft 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.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is 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. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

(DRAFT)

Jeffery F. Koerner, Program Administrator
Permitting and Compliance Section
Division of Air Resource Management

(Date)

DRAFT PERMIT MODIFICATION

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) 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 _____ (DRAFT) _____ to the persons listed below.

- Mr. Scott Salisbury, Brevard Energy, LLC. (scott.salisbury@landfillenergy.com)
- Mr. Rob Harvey, P.E., Derenzo and Associates, Inc (rharvey@derenzo.com)
- Mr. Euripides Rodriguez, Brevard Board of County Commissioners (euripides.rodriguez@brevardcounty.us)
- Ms. Caroline Shine, Central District Office (caroline.shine@dep.state.fl.us)
- Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

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.

(DRAFT)

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

Brevard County Solid Waste Management Central Disposal Facility (Central Disposal Facility) operates a Class I municipal solid waste (MSW) landfill in Cocoa, Brevard County which is allocated for Class I MSW. Landfill gas (LFG) is a product of the microbial decomposition of waste and is extracted by recovery wells that are located in both active and capped cells of the landfill.

PROPOSED PROJECT

This draft permit revises the permitted emissions limits and compliance testing requirements for carbon monoxide (CO) and particulate matter with an aerodynamic diameter of less than 10 micrometers (PM₁₀).

This project affects the following existing emissions units.

EU No.	Emissions Unit Description
004 - 009	Six Caterpillar Model G3520C internal combustion engines and electrical generators that are exclusively fueled with LFG. Each engine has an energy output of 2,233 brake horsepower at 100% load and generates 1,600 kilowatt of power. The LFG is pretreated by filtering, compressing, and dewatering prior to combustion in the engines.

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 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- The facility operates units subject to the following applicable New Source Performance Standards (NSPS) in Title 40, Part 60 of the Code of Federal Regulations (40 CFR 60): Subpart A (General Provisions), Subpart WWW (MSW Landfills).
- The facility operates units subject to the following applicable National Emissions Standards for Hazardous Air Pollutants (NESHAP) in Title 40, Part 63 of the Code of Federal Regulations (40 CFR 63): Subpart A (General Provisions), Subpart AAAA (MSW Landfills), and Subpart ZZZZ (Reciprocating Internal Combustion Engines).

SECTION 2. PERMIT MODIFICATIONS (DRAFT)

Permit Being Modified: Permit No. 0090069-004-AC (PSD-FL-378)

Affected Emissions Units: EU-004 through EU-009

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. An underline is used to denote the addition of text.

A. FUEL SPECIFICATIONS AND WORK PRACTICES

Add the following new condition:

14. NESHAP Subpart ZZZZ: The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE) to Subpart ZZZZ of Part 63 for Existing Stationary RICE located at area sources states that at a minimum the following maintenance shall be performed:

- a) Change oil and filter every 1,440 hours of operation or annually, whichever comes first. Sources have the option to utilize an oil analysis program as described in § 63.6625(i) in order to extend the specified oil change requirement;
- b) Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first; and
- c) Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR Part 63, Subpart ZZZZ, Rule 62-204.800, F.A.C.; Modifies Permit No. 0090069-004-AC (PSD-FL-378)]

B. EMISSION AND PERFORMANCE REQUIREMENTS

Revise the following conditions:

2. **Carbon Monoxide (CO):** The emission rate of CO from each engine/generator set exhaust shall not exceed 3.50 grams per brake horsepower hour (g/bhp-hr) with a maximum of 17.23 lb/hr and 75.3 TPY ~~2.75 grams per brake horsepower hour (g/bhp-hr) with a maximum of 13.54 lb/hr and 59.30 TPY.~~ **[Rule 62-212.400(BACT12), F.A.C.; and Modifies Permit No. 0090069-004-AC (PSD-FL-378)]**

3. **Particulate Matter less than 10 microns (PM₁₀):** ~~The emission rate of PM₁₀ from each engine/generator set exhaust shall not exceed 0.24 g/bhp-hr and a maximum of 1.18 lb/hr and 5.17 TPY.~~ Particulate matter emissions shall be controlled from each engine/generator set exhaust through the implementation of the following pretreatment and good combustion practices.

- a) Operate and maintain a landfill gas pretreatment system to dewater, filter and compress the landfill gas prior to combustion in the engines. During the final stage of pretreatment, the landfill gas shall pass through a coalescing filter of 1 micrometer or less to reduce particulate matter prior to combustion.
- b) Implement good combustion practices to minimize particulate matter emissions: lean-burn combustion design, efficient combustion through the air-fuel controller and preventive and periodic maintenance in accordance with the requirements of 40 CFR 63, Subpart ZZZZ.

{Permitting Note: Pretreatment and good combustion practices are expected to result in a maximum PM₁₀ emission rate of 0.24 g/bhp-hour, 1.18 lb/hr, and 5.17 TPY.}

[Rule 62-212.400(BACT12), F.A.C.; and Modifies Permit No. 0090069-004-AC (PSD-FL-378)]

SECTION 2. PERMIT MODIFICATIONS (DRAFT)

7. **Opacity:** As determined by EPA Method 9, ~~V~~visible emissions from each engine/generator set exhaust shall not exceed 10% opacity. [**Rule 62-212.400(BACT), F.A.C.; and Modifies Permit No. 0090069-004-AC (PSD-FL-378)**]

C. TEST METHODS AND PROCEDURES

Revise the following condition:

2. Performance Test Methods

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) EPA Method 7 or 7E – Determination of NO_x Emissions from Stationary Sources (I,A);
- (b) EPA Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources (I,A);
- (c) EPA Method 10 – Determination of CO Emissions from Stationary Sources (I,A);
- (d) EPA Method 18, 25, 25A or 25C – Measurement of Gaseous Organic Compounds Emissions (I,R);
- (e) EPA Method 26 or 26A – Determination of Hydrogen Chloride (HCl) Emissions from Stationary Sources (I,A);
- ~~(f) EPA Method 201 – Determinations of PM₁₀ 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 Modifies Permit No. 0090069-004-AC (PSD-FL-378)**]

Friday, Barbara

To: scott.salisbury@landfillenergy.com
Cc: sstacy@derenzo.com; rharvey@derenzo.com; Shine, Caroline; 'Kathleen Forney';
abrams.heather@epamail.epa.gov; Gibson, Victoria; Koletzke, Marilyn; Koerner, Jeff; Walker,
Elizabeth (AIR)
Subject: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY
CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV
Attachments: Draft0090069ACAVSignedWrittenNoticeofIntent.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Marilyn Koletzke

Owner/Company Name: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS
Facility Name: BREVARD COUNTY CENTRAL DISPOSAL FACILITY
Project Number: 0090069-009-AC(PSD-FL-378C)/0090069-010-AV
Permit Status: DRAFT/DRAFT-PROPOSED
Permit Activity: CONSTRUCTION/TITLE V PERMIT REVISION
Facility County: BREVARD

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0090069.009.AC.D_pdf.zip

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0090069.010.AV.D_pdf.zip

"The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website ^{at} <http://appprod.dep.state.fl.us/air/emission/apds/default.asp>

Permit project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation.

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)

Friday, Barbara

From: Microsoft Exchange
To: scott.salisbury@landfillenergy.com
Sent: Tuesday, June 21, 2011 2:41 PM
Subject: Relayed: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

scott.salisbury@landfillenergy.com

Subject: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Scott Salisbury [Scott.salisbury@landfillenergy.com]
To: Friday, Barbara
Sent: Tuesday, June 21, 2011 3:04 PM
Subject: Read: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY
CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Your message was read on Tuesday, June 21, 2011 3:03:50 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: sstacy@derenzo.com; rharvey@derenzo.com
Sent: Tuesday, June 21, 2011 2:40 PM
Subject: Relayed: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

sstacy@derenzo.com

rharvey@derenzo.com

Subject: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Robert Harvey [rharvey@derenzo.com]
Sent: Monday, June 27, 2011 8:21 AM
To: Friday, Barbara
Subject: Read: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY
CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV
Attachments: ATT00001

Friday, Barbara

From: Robert Harvey [rharvey@derenzo.com]
Sent: Wednesday, June 22, 2011 12:29 PM
To: Friday, Barbara
Subject: Re: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

I have received this message.

Thank you,
Robert Harvey

Quoting "Friday, Barbara" <Barbara.Friday@dep.state.fl.us>:

> Dear Sir/ Madam:
>
> Attached is the official Written Notice of Intent to Issue Air 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".
> Note: We must receive verification that you are able to access the
> documents. Your immediate reply will preclude subsequent e-mail
> transmissions to verify accessibility of the document(s).
>
> Attention: Marilyn Koletzke
>
> Owner/Company Name: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS
> Facility Name: BREVARD COUNTY CENTRAL DISPOSAL FACILITY Project
> Number: 0090069-009-AC(PSD-FL-378C)/0090069-010-AV
> Permit Status: DRAFT/DRAFT-PROPOSED
> Permit Activity: CONSTRUCTION/TITLE V PERMIT REVISION Facility County:
> BREVARD
>
> Click on the following link to access the permit project documents:
> http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0090069.009.AC.D_pdf.zip
>
> Click on the following link to access the permit project documents:
> http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0090069.010.AV.D_pdf.zip "The Bureau of Air Regulation is issuing
> electronic documents for permits, notices and other correspondence in
> lieu of hard copies through the United States Postal System, to
> provide greater service to the applicant and the engineering
> community. Access these documents by clicking on the link provided
> above, or search for other project documents using the "Air Permit
> Documents Search"
> website at
> <http://appprod.dep.state.fl.us/air/emission/apds/default.asp>.
> Permit project documents that are addressed in this email may require
> immediate action within a specified time frame. Please open and review
> the document(s) as soon as possible, and verify that they are

Friday, Barbara

From: Microsoft Exchange
To: Koletzke, Marilyn; Walker, Elizabeth (AIR); Shine, Caroline; Koerner, Jeff
Sent: Tuesday, June 21, 2011 2:40 PM
Subject: Delivered: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Your message has been delivered to the following recipients:

Koletzke, Marilyn

Walker, Elizabeth (AIR)

Shine, Caroline

Koerner, Jeff

Subject: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Koletzke, Marilyn
To: Friday, Barbara
Sent: Thursday, June 23, 2011 8:56 AM
Subject: Read: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY
CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Your message was read on Thursday, June 23, 2011 8:56:14 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Shine, Caroline
Sent: Tuesday, June 21, 2011 2:40 PM
To: Friday, Barbara
Subject: Out of Office: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Thank you for your email message!

I will be out of the office on 6/21-24. I will be checking messages. Please contact Dina Jones at 407-893-3333 or Tracy Agner at 407-893-3334 if you need immediate assistance.

Thank you, Caroline Shine
Air Program Administrator

Friday, Barbara

From: Koerner, Jeff
To: Friday, Barbara
Sent: Tuesday, June 21, 2011 3:40 PM
Subject: Read: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY
CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Your message was read on Tuesday, June 21, 2011 3:39:47 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Gibson, Victoria
Sent: Tuesday, June 21, 2011 2:40 PM
Subject: Delivered: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Your message has been delivered to the following recipients:

Gibson, Victoria

Subject: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Tuesday, June 21, 2011 2:45 PM
Subject: Read: BREVARD COUNTY BOARD OF COUNTY COMMISSIONERS - BREVARD COUNTY
CENTRAL DISPOSAL FACILITY; 0090069-009-AC(PSD0FL378C)/0090069-010-AV

Your message was read on Tuesday, June 21, 2011 2:44:35 PM (GMT-05:00) Eastern Time (US & Canada).