



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

December 15, 2010

Electronic Mail – Received Receipt Requested

Tim Hawkins, South Florida Market Area Vice President
Waste Management, Inc. of Florida
2700 Northwest 48th Street
Pompano Beach, FL 33073

Re: **Request for Additional Information**
Project No. 0250615-012-AC (PSD-FL-414)
Waste Management, Inc. of Florida, Medley Landfill
Landfill Gas-to-Energy Project

Dear Mr. Hawkins:

On November 22, 2010, we received your response from our request for addition information regarding the construction and operation of a landfill gas-to-energy facility at Medley Landfill, which will use landfill gas as fuel for six Caterpillar (CAT 3520) engines. The facility is located in Miami-Dade County at 9350 Northwest 89th Avenue in Medley, Florida. The application indicates that the project is subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality pursuant to Rule 62-212.400, of the Florida Administrative Code (F.A.C.). The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The Medley facility is an open municipal solid waste (Class I) landfill. Does the facility also include any Class III or construction and demolition landfills? Based on your current solid waste permits, please identify the landfill capacity in the following terms: acres, million megagrams (mass) and million cubic meters (volume). Please include waste in place as well as future capacity that is permitted under a solid waste permit. Based on the current design capacity specified in the solid waste permits, estimate the potential annual NMOC emissions (megagrams per year).
2. The revised Table 2-2 (Potential Emissions from Existing 6,000 SCFM Enclosed Flare (EU ID 005)) was not included in your attachments. Please submit.
3. Rule 62-210.370, F.A.C. establishes a hierarchy for emissions calculations (e.g., continuous emission monitoring system (CEMS), mass balance, stack test data and emission factors). The objective is to use the available data that best represents emissions from the project. The Department agrees that the project is subject to PSD preconstruction review or CO, NO_x and PM₁₀ emissions increases. However, since the application projects SO₂ emissions increases just below the PSD significant emissions rate, please use the specific H₂S emissions data available for the Medley landfill to determine baseline actual SO₂ emissions. For the projected actual emissions, also use H₂S data specific to the Medley landfill and provide additional information to support any claim that the H₂S concentration in landfill gas will increase or decrease in the future. The referenced letter (dated November 21, 2008 from the Department of Environmental Resources

REQUEST FOR ADDITIONAL INFORMATION

Management) does not supersede the requirements of Rule 62-210.370, F.A.C. Also, please explain how the 2008 PSD applicability issue addressed in this letter was resolved.

4. Your response states that the project is not subject to PSD review for SO₂ emissions because the SO₂ emissions increase will be "limited" to no more than 39 tons per year, which is less than the PSD significant emissions rate. This is based on an estimated maximum H₂S concentration in landfill gas of 830 ppmv. Please explain how the H₂S concentration will be maintained below a maximum level of 830 ppmv.
5. Please estimate the greenhouse gas (GHG) emissions increases resulting from this project. Based on current federal regulations, it will be necessary to obtain a separate PSD permit that specifies the Best Available Control Technology for reducing GHG emissions if GHG emissions increases are greater than 75,000 tons per year.
6. Please provide the additional information requested regarding the air quality analysis.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Tammy McWade, at 850/488-1906 or me at 850/921-9536.

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section

This letter was sent to the following persons by electronic mail with received receipt requested.

Mr. Tim Hawkins, Waste Management, Inc. (thawkins@wm.com)
Mr. James Kisiel, P.E., Waste Management Inc. (jkisiel@wm.com)
Mr. David A. Buff, P.E., Golder Associates Inc. (dbuff@golder.com)
Mr. Lennon Anderson, SED Office (lennon.anderson@dep.state.fl.us)
Ms. Mallika Muthias, Miami-Dade DERM (muthim@miamidade.gov)
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)

JFK/ttm

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, December 15, 2010 2:22 PM
To: 'thawkins@wm.com'
Cc: 'jkisiel@wm.com'; 'dbuff@golder.com'; Anderson, Lennon; 'muthim@miamidade.gov'; 'Forney.Kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; Gibson, Victoria; McWade, Tammy; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: UPDATE: Request for Additional Information: Waste Management, Inc. of Florida - Medley Landfill (0250615-012-AC/ PSD-FL-414)
Attachments: RAI 0250615-012-AC_121510.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Hawkins, Tim [THawkins@wm.com]
Sent: Wednesday, December 15, 2010 4:04 PM
To: Livingston, Sylvia
Cc: Tindell, Bryan
Subject: RE: UPDATE: Request for Additional Information: Waste Management, Inc. of Florida - Medley Landfill (0250615-012-AC/ PSD-FL-414)

We can view the documents.

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, December 15, 2010 2:22 PM
To: Hawkins, Tim
Cc: Kisiel, James; dbuff@golder.com; Anderson, Lennon; muthim@miamidade.gov; Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; McWade, Tammy; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: UPDATE: Request for Additional Information: Waste Management, Inc. of Florida - Medley Landfill (0250615-012-AC/ PSD-FL-414)

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Thank you,

Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

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