



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen Castille
Secretary

March 1, 2006

Mr. Anthony Fraccalvieri
Dixie Waste Services, LLC.
Post Office Box 850
Cross City, Florida 32628

Dear Mr. Fraccalvieri:

Dixie County – Air Permitting
Dixie Waste Service Waste Gasification/Thermal Oxidizer
AIRS ID Number: 0290016
Request for Additional Information

In accordance with Section 62-4.055(1), Florida Administrative Code (F.A.C.), and Chapter 120, Florida Statutes, (F.S.), the Department has reviewed the additional information response received on December 12, 2005, and has determined that the following information and questions need to be answered before the application can be further processed. Please provide all calculations, assumptions, and any reference material that may be used to address the questions identified below.

1. Response to comment 1. The response received did not address the applicability of F.A.C. Rule 62-296.401 (4) - Biological Waste Incineration Facilities to the proposed unit. Please provide the complete information as requested.
2. Response to comment 2. The response received did not clarify whether the facility “will” increase the capacity in the future. Please provide the complete information as requested. Also, please note that it is the physical design capacity of the municipal waste combustion units that shall be used to determine if the facility is one of the 28 major source categories, not the capacity of the municipal waste combustion unit.
3. Response to comment 3. Please submit the following five items as required by 40 CFR 60.1090. Please note that the Department will not deem the application complete without these items submitted.
 - a) Your draft materials separation plan.
 - b) Your revised materials separation plan.
 - c) Your notice of public meeting for your draft materials separation plan.
 - d) A transcript of the public meeting on your draft materials separation plan.
 - e) The document that summarizes your responses to the public comments you received during the public comment period on your draft materials separation plan.
4. Response to comment 5. Please note that since the facility requests to limit the fuel feed stream to 10 percent or less by weight of medical waste, the applicant shall revise the potential emissions estimation based on this assumption. Please provide all detail calculations, assumptions, and any reference material.

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5. Response to Comment 6. It is realized that the potential NOx emissions is calculated to be 305.7 tons/year based on 8760 hours of operation and 69.8 lbs/hour of emissions in stead of 249.4 tons/year as indicated in the application. Please explain.
6. Response to comment 7. Mercury is a powerful neurotoxin that can cause adverse health effects in humans, including negative effects on brain development and nervous systems. It is critical for the facility to take step to provide a detail plan to ensure the Department that the facility is committed to minimize the mercury emissions to the lowest level that it possibly can. The plan to minimize the mercury emissions can be included in the material separation plan or being proposed in separate document.
7. Response to comment 10. The applicant is required to estimate the capacity of the proposed unit based on method shown in 40 CFR 60.1460. The capacity estimated will be used to determined the classification of the combustion unit to either Class I Units or Class II Units according to 40 CFR 60.1045. The applicant cannot avoid the classification by establishing maximum federally enforceable throughput rate. Please provide complete information as requested.
8. Response to comment 15. Please note that the Department cannot deem the application complete without the final design information and specification submitted. Please submit the complete information as requested.
9. Response to comment 17. Please note that the Department cannot deem the application complete without the final control unit design information and specification submitted. Please submit the complete information as requested.
10. Response to comment 18. Please note that the Department cannot deem the application complete without the final control unit design information and specification submitted. Please submit the complete information as requested.
11. Response to comment 20. Please note that the Department cannot deem the application complete without the final detail project area diagram submitted. Please submit the complete information as requested.
12. Response to comment 25. It is realized that the facility will have to sort the waste onsite due to solid waste program requirement. Please address how the facility plans to minimize the potential odor problem if the facility has to sort the waste on site.
13. The responses to Comment Nos. 25, 27, 29, 30 and/or 31 indicate that waste will be pre-sorted at the County's transfer station and therefore can be deposited directly into the combustion cells without being sorted or stored onsite. Furthermore, the response to Comment No. 27 indicates that the facility is independent of the County. Please note, however, that FAC Rule 62-701.710(4)(a)2 requires the inspection of wastes received by the facility. Therefore, all waste will have to be dumped, spread, sorted and (at least briefly) stored prior to being placed into the combustion cells.
14. The response to Comment No. 31 appears to say that, since the waste will be deposited directly into the combustion cells, litter control devices and visual screenings will not be provided. Please note that FAC Rule 62-701.710(3)(a) requires that these items be provided regardless of the operational methods and, since waste will have to be dumped, spread, sorted and stored prior to being placed into the combustion cells, the litter control devices and visual screenings are very important.


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15. The response to Comment No. 32 appears to imply that a leachate control system will not be necessary due to the design of the combustion cells and the nature of the operation. Please note that, even if the waste was deposited directly into the combustion cells (which, as indicated above, is not allowed), the trucks that haul it to the facility sometimes leak and when that leakage is concentrated at one spot over a long period of time, groundwater quality can be impacted. For this reason, FAC Rule 62-701.710(3)(b) requires the facility to have a leachate control system regardless of its method of operation and both that Rule and FAC Rule 62-701.710(8) prohibit the mixing of leachate with stormwater. Therefore, please provide for a leachate control system that will prevent the discharge of leachate, will minimize the mixing of leachate with stormwater and will minimize the presence of standing water.

The subject application for permit cannot be processed until the above requested information is provided or corrected. In accordance with Rule 62-4.055(1), F.A.C., the response to this requested information is due within 90 (ninety) days from receipt of this letter, unless you (the applicant) request additional time. All information requested must be submitted by the applicant and certified by the professional engineer named in the application.

If you have any questions, please call MengChiu Lim at (904) 807-3238.

Sincerely,



Christopher L. Kirts, P.E.
District Air Program Administrator

CLK:mcl
Enclosures

Cc: Robert Bull, DARM
Bernardo Susi, P.E., Golder Associates, Inc.