DEPARTMENT OF PUBLIC UTILITIES

Solid Waste Disposal Division

April 5, 1991

RECEIVE

APR 9 1991

DER - BAOM

Mr. Barry Andrews, P.E. Bureau of Air Regulation Florida Department of Environmental Regulation Twin Towers Office Building 2600 Blairstone Road Tallahassee, Florida 32399-2400

East Landfill Flare Facility Permit No.: AC 16-186047

Dear Mr. Andrews,

As requested by Mr. C.H. Fancy's letter of March 18, 1991, transmitted herewith is the proof of publication of the Notice of Intent to Issue for the referenced permit. All comments regarding this permit will be submitted to your office under separate cover within the next five business days.

If additional information is needed regarding this matter, please contact me or Mr. Chris Pearson at (904) 630-0973.

Sincerely

órge R. Knecht, P.E. Manager of Disposal

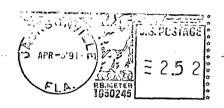
Gordon Threlkeld, P.E.

a. Rutyna, NE District R. Roberson, BESD



SOLID WASTE DISPOSAL DIVISION 1931 EAST BEAVER STREET JACKSONVILLE, FLORIDA 32202







RETURN RECEIPT REQUESTED

MR BARRY ANDREWS P E
BUREAU OF AIR REGULATION
FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION
TWIN TOWERS OFFICE BUILDING
2600 BLAIRSTONE ROAD
TALLAHASSEE FLORIDA 32399-2400

EQUAL OPPORTUNITY EMPLOYER



PROOF OF PUBLICATION

(Published Daily Except Saturday and Sunday) Jacksonville, Duval County, Florida

STATE OF FLORIDA,
COUNTY OF DUVAL,

Before the undersigned authority personally appeared

Donna R. Collins, who on oath says that she is the Business Manager of FINANCIAL NEWS and DAILY RECORD, a daily (except Saturday and Sunday) newspaper published at Jacksonville, in Duval County, Florida; that the attached copy of advertisement, being a

	NOTICE OF	F INTENT TO ISSUE
in the matter of	_East Duval	Sanitary Landfill
in the		Court, of Duval County, Florida, was published
in said newspaper in the	issues of	April 1, 1991

Affiant further says that the said FINANCIAL NEWS and DAILY RECORD is a newspaper at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, each day (except Saturday and Sunday) and has been entered as second class matter at the post office in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Business Manager

Sworn to and subscribed before me this -

lst

day of Apri

– A.D. 19<u>9</u>3

Notary Public, State of Florida My Comm. Exp Oct. 14, 1994

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF INTENT TO ISSUE

The Department of Environmental: Regulation hereby gives notice of its intent to issue a permit to City of Jacksonville, Solid Waste Disposal, 1931 E. Beaver Street, Jacksonville, Florida 32202, to construct a enclosed flare for the collection and disposal of active gases from twelve extraction wells at the East Duval Sanitary Landfill located at 515 Girvin Road, Jacksonville, Duval County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affect by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action:

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of
Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road

Tallahassee, Florida 32399-2400 Duval County Dept. of Health,

Welfare & Bio-Environmental Services 421 W. Church Street, Suite 412 Jacksonville, Florida 32202

Department of
Environmental Regulation
Northeast District Office
7825 Baymeadows Way
Jacksonville, Florida 32256-7577

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of publication of this notice will be considered in the Department's final determination.

Apr. 1

(91-2069)





April 19, 1991

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DER - BAQM

Mr. Barry Andrews
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: EAST DUVAL SANITARY LANDFILL

FDER FILE NO. AC 16-186047

NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

Dear Mr. Andrews:

The City of Jacksonville has reviewed the above-referenced Intent to Issue an air construction permit for an enclosed flare at the East Duval Sanitary Landfill. Pursuant to Chapter 17-4.080(2), Florida Administrative Code, the City of Jacksonville requests modification of Specific Condition No. 7, on page 6 of 7, which reads as follows:

"Proper devices for continuous monitoring and recording of the 12 extraction wells gas flow rate and the flare temperature shall be installed prior to collection and disposal of active landfill gasses. Such devices shall be properly calibrated and maintained at all times."

The requirement for continuous recording of the flow rate of the 12 extraction wells does not appear to be warranted, and the additional cost to implement this condition is excessive. The requested flow meters will not provide any information relative to the operation of, or emissions from, the flare.

The active landfill gas system will be calibrated, and monitored, using a portable Omega model PX605-30V30I pressure transmitter and Omega model DP-203 digital indicator calibrated to read inches of water column. This procedure is consistent with the practice at other active landfill gas flare projects in Florida.

The cost to install non-recording flow meters on each well is estimated at \$4,500 per well, for a total additional cost of \$54,000. The cost to install flow meters with recorders and appropriate instrumentation and power is estimated at \$10,000 per well, for a total additional cost of \$120,000. These additional costs represent increases of approximately 4% and 9%, respectfully, of the estimated \$1,400,000 construction cost for the active landfill gas flare system. Additionally, the cost to redesign the well-head assembly will cost approximately \$24,000.

Mr. Barry Andrews April 19, 1991 Page 2

Alternatively, a single recording flow meter could be installed at the input to the flare for a materials, installation and design costs of approximately \$15,000.

The City of Jacksonville proposes that the above-referenced specific condition be re-stated as follows:

"Proper devices for continuous monitoring and recording of the gas flow rate in the input line to the flare and the flare temperature shall be installed prior to collection and disposal of active landfill gasses. Such devices shall be properly calibrated and maintained at all times."

If you have any questions, please call me at your convenience.

Very truly yours,

POST, BUCKLEY, SCHUH & JERNIGAN, INC.

Gordon Threlkeld, P.E.

Solid Waste/Resource Recovery Division

22-087.00

CC: M. Brig A. Kutima, NE Dist R. Roberson, BESD

