From:	Prusa, Rick
To:	Holtom, Jonathan
Cc:	Sarasua, Armando
Subject:	RE: Springhill Landfill 0630045 October 2002 variance reference
Date:	Friday, January 03, 2014 11:31:03 AM
Attachments:	Springhill RLF 0630045 Record of Conversation 20020530.pdf Springhill RLF Revised NSPS GCCS Design Plan & Monitoring Plan October 2002.pdf Springhill RLF 0630045 RAI 20030213.pdf Springhill RLF 0630045 RAI Response 20030416.pdf Springhill RLF 0630045 Memo to File 20030613.pdf Springhill RLF North 0630045 GCCS capping and removal 20111102.pdf Springhill RLF 0630045 GCCS Expansion with Air permitting Chronology 20121113.pdf

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Jon,

Regarding Springhill RLF, Facility I.D. 0630045, requests to remove or change monitoring/recordkeeping/recording procedures from 40 CFR 60 Subpart WWW were initially made in a GCCS Design Plan in an October 2002 Solid Waste permit application, and formally requested to EPA in a letter dated April 15, 2003. Our records found no reply from EPA regarding the request. I have attached from our archives, the following:

- A record of conversation dated May 30, 2002. This documents that DARM agrees with the request by the landfill to begin closure of the GCCS for North Landfill (ceased accepting waste in July 1999), with long term care for 15 years or until landfill gas falls below 50 Mg per year.

- A GCCS Design Plan request for alternative monitoring/recordkeeping/recording procedures from an October 2002 Solid Waste permit application. This indicates that the Springhill North Landfill began a GCCS on June 3, 1996, before NSPS mandated timelines. Current Title V Air Operation Permit 0630045-007-AV states "The North Landfill first accepted waste in 1983 and ceased accepting waste in July 1999. A closure notification was submitted on June 10, 2002, and the current solid waste closure permit 127123-0021-SF expires October 3, 2017. "Pursuant to 40 CFR 60.753(b)(3), gas wells may be decommissioned due to declining flow upon approval of the Administrator". This system must operate a minimum of 15 years. Requested changes to 40 CFR 60 Subpart WWW include: 1) 40 CFR 60.753(d) surface monitoring design plan intervals from 30 meters upon demonstration that the geomenbrane covered areas experience no exceedances for 3 consecutive quarters to 60 meters in these areas, 2) 40 CFR 60.753(c) horizontal trenches to be exempt from deviations if exceedances of O2/N2 requirements and pressure requirements occur due to horizontal trench variations. Temperature will be monitored and exceedances reported. 3) Leachate sump/riser connections sometimes contain ambient concentrations of O2/N2, above NSPS thresholds and should not apply to leachate cleanout riser and leachate sump extraction points, 4) 40 CFR 60.755(c)(4) variance to increase 10 day window allowed to make adjustments for 500 ppm or more surface methane exceedances, 5) 40 CFR 60.755(c)(5) to change inspecting cover integrity and implement repairs from monthly to annually, 6) 40 CFR 60.756(f) to treat each landfill area separately (North LF and South LF) for allowing annual monitoring for no monitored exceedances of the operational conditions in three consecutive quarterly monitoring periods, 6) 40 CFR 60.758(b)(4) and 60 758(c)(4) recordkeeping of absence of flare flame by using gas flow changed to the flare continuously, where no flow means flare is off, 7) 40 CFR 60.757(d) to treat North LF as a separate closed LF to reduce frequency of surface scan monitoring upon demonstration of 3 consecutive

quarterly monitoring periods with no exceedances and to allow removal of GCCS once 15 years of closure and NMOC less than 50 Mg per year can be shown.

- An RAI letter dated February 13, 2003. Item 3 states "In Section III of the Revised NSPS Collection and Control System Design Plan and Monitoring Plan dated October 2002, you requested several waivers to NSPS Subpart WWW. Since your requests would circumvent parts of WWW, and in view of the recent issuance of NESHAP Subpart AAAA, we suggest that you make these requests directly to the EPA (please include a copy with your reply to us." Item 4 states "With regard to the Design Plan proposed that the North and South areas be treated separately for purposes of establishing different startup dates for a LFGCCS and therefore potentially different shutdown dates, we consider the proposal acceptable on the basis that the two areas are physically apart and under completely separate collection and control systems".

- An RAI response letter dated April 16, 2003 includes a letter to EPA dated April 15, 2003 with the requested waivers of several 40 CFR 60 Subpart WWW requirements.

- A Memo to File dated June 13, 2003 citing TLH as saying a construction permit is not required for a control device flare for South Landfill.

- An email dated November 2, 2011 regarding capping and removal of GCCS at North Landfill after 15 years of closure and NMOC less than 50 Mg per year.

- An email dated November 13, 2012 regarding GCCS expansion in Springhill South, which includes a permit chronology.

This is the best of the information available. Please note that neither Armando nor I were in the AIR Program in 2002-2003. If you need further assistance please contact me.

Sincerely,

Rick Prusa
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Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

From: Sarasua, Armando
Sent: Thursday, December 12, 2013 12:08 PM
To: Prusa, Rick

Cc: Holtom, Jonathan
Subject: Springhill Landfill 0630045 October 2002 variance reference

Rick,
Please look into this ASAP for Jon.
Tasked for Tracking.
R/Armando

From: Holtom, Jonathan
Sent: Wednesday, December 11, 2013 8:59 AM
To: Sarasua, Armando
Subject: Springhill Landfill 0630045

Armando,

I'm reviewing a Title V renewal application for the Springhill landfill and they have requested that we remove the NSPS requirements from the closed North portion of the landfill. This is a bit contrary to the requirements of WWW, but the Title V permit issued out of your office 5 years ago references a variance issued in October of 2002 that might give them ability to do what they are asking. Do you possibly have a copy of the referenced variance that you could email to me?

{Permitting Note: Start-up for the landfill gas collection and control system for the North Landfill has been established as June 3, 1996. Pursuant to an approved variance request in the October 2002, Revised NSPS Landfill Gas Collection and Control System Design Plan, the facility is permitted to treat the closed North Landfill as an independent unit from the active South Landfill, for the purposes of capping and removing the collection and control system. Specifically, the facility may evaluate the NMOC emissions rate from the North Landfill as a stand-alone unit, rather than combining the emissions from the South Landfill in order to determine whether the landfill NMOC emissions rate has fallen below 50 Mg/year.}

Thank you for your help!

Jon

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