From: Holtom, Jonathan
To: "Parker, Eric (FL)"
Cc: Read, David
Subject: RE: Springhill draft Title V permit comments
Date: Thursday, June 26, 2014 9:43:00 AM

Eric,

Pursuant to our conversation this morning regarding the comments you submitted concerning the Springhill draft Title V permit renewal, the following changes will be made to the Proposed permit prior to submitting it for EPA's 45-day review:

Condition C.3. will be changed as follows to include your request for the addition of "Like/Kind" but will also include the clarification that the heat input of the replacement engine shall not be greater than the engine that it replaces:

C.3. Methods of Operation.

a. *Fuel*. The engines in this emissions unit are authorized to burn treated landfill gas.

b. *Authorized Engine Rebuild*. At the time that any of the six CAT 3516C engine/generator sets that comprise emissions unit EU 005 needs to be rebuilt, the owner may rebuild the engine on or offsite, and document that the engine does or does not meet the definition of "reconstruction". Note: *Reconstruction* is defined as the replacement of components of an affected or a previously non-affected source to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source. (See Specific Condition **C.17.** for testing requirements.)

c. *Like-Kind Engine Replacement With "Existing" Engine*. At the time that any of the six CAT 3516C engine/generator sets that comprise emissions unit EU 005 needs to be replaced, the owner or operator may permanently replace the unit with an engine that shall be the identical make, model, model year or older, and maximum heat input. All replacement engines shall be owned by Waste Management. All replacement engines shall meet the applicable requirements of 40 CFR 63 Subpart ZZZZ, and document that the engine does or does not meet the definition of reconstruction". (See Specific Condition **C.17.** for testing requirements.)

d. *Like-Kind Engine Replacement with "New" Engine*. At the time that any of the six CAT 3516C engine/generator sets that comprise emissions unit EU 005 needs to be replaced, the owner or operator may permanently replace the unit with a replacement engine that is subject to 40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart JJJJ. The replacement engine shall be the same model (or equivalent), shall have the same maximum heat input, and shall comply with all applicable requirements under 40 CFR 60, Subpart JJJJ, as specified in Appendix NSPS JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. (See also Specific Condition **C.17.**)

[Rules 62-4.160(2) and 62-213.440(1), F.A.C. and Permit No. 0630045-005-AC, Condition A.1.]

We would prefer not to make the requested change on page 15 in order to retain the actual language of the federal rule and to keep this permit consistent with similar permits. You indicated that this was acceptable.

The requested change on page 35 to correct the outlet gas temperatures from "between 1200 and 1400°F" to "between 600 and 100°F" will be made.

The requested additional language in Appendix M is not needed, as that language is already included in Specific Condition B.6.

Thank you (and Dave) for taking the time to review the draft permit and for providing comments. The agreed upon changes are sufficiently minor to not require a reissuance of the draft permit and you may proceed with the publication of the Public Notice at your earliest opportunity. The changes mentioned above will be made to the proposed permit prior to submitting it for EPA review. Please be sure to send (email) me a copy of the Proof of Publication as soon as you get it.

Please do not hesitate to contact me if you any additional questions or comments.

Jon Holtom, P.E., CPM
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From: Parker, Eric (FL) [mailto:EParker1@wm.com]
Sent: Friday, June 20, 2014 9:31 AM
To: Holtom, Jonathan
Cc: Scearce, Lynn
Subject: FW: Springhill draft Title V permit comments

Jonathan, we have conducted a thorough review of the draft proposed permit and are pleased with the overall permit. However, we do have a few minor corrections and suggestions noted within the attached documents and language below.

Document pages (15, 35, Appendix M)

In addition; we also would like to see the following changes in the Springhill draft permit:

See the additions in **RED**

Authorized Engine Rebuild. At the time that any of the six CAT 3516C engine/generator sets that comprise emissions unit EU 005 needs to be rebuilt, the owner may rebuild the engine on or offsite, and document that the engine does or does not meet the definition of "reconstruction". Note: *Reconstruction* is defined as the replacement of components of an affected or a previously non-affected source to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source. (See Specific Condition **C.17.** for testing requirements.)

c. *Like-Kind Engine Replacement With "Existing" Engine*. At the time that any of the six CAT 3516C engine/generator sets that comprise emissions unit EU 005 needs to be replaced, the owner or operator may permanently replace the unit with an engine that shall be the identical make, model, model year or older, and maximum heat input. All replacement engines shall be owned by Waste Management. All replacement engines shall meet the applicable requirements of 40 CFR 63 Subpart ZZZZ, and document that the engine does or does not meet the definition of reconstruction" (See Specific Condition **C.17.** for testing requirements.)

OR

d. *Like-Kind Engine Replacement with "New" Engine*. At the time that any of the six CAT 3516C engine/generator sets that comprise emissions unit EU 005 needs to be replaced, the owner or operator may permanently replace the unit with a replacement engine that is subject to 40 CFR 63, Subpart ZZZZ and 40 CFR 60, Subpart JJJJ. The replacement engine shall comply with all applicable requirements under 40 CFR 60, Subpart JJJJ, as specified in Appendix NSPS JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. (See also Specific Condition **C.17.**)

[Rules 62-4.160(2) and 62-213.440(1), F.A.C. and Permit No. 0630045-005-AC, Condition A.1.]

Thanks,

Eric Parker
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