From: Holtom, Jonathan
To: "Parker, Eric (FL)"
Subject: RE: Springhill draft Title V permit comments
Date: Thursday, June 26, 2014 9:11:00 AM

C.1. 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.]

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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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