From:	Omar Smith
To:	Arif, Syed; Pennington, Jim
Cc:	McWade, Tammy; Svec, Ed; Bogin, Michael; Rachal, Richard; "Scott Herring"; "Becky Bray"; "Sara Greivell"; "Bruno Ferraro"; "Becky Diden-Nassau County"; "Edward Diden"; "Sam Levin"; "Sandeep Saraf"; "Derek Patrick"; "Cheryl Hollister"
Subject:	Nassau County Title V Air Operations Permit No. 0890428-008-AV -- Request for Change to its ASP for Low Production Extraction Wells
Date:	Thursday, October 02, 2014 5:19:31 PM
Attachments:	NC Requested ASP Language FINAL 10-02-14.docx NC Request for Change to ASP Low Production Wells FINAL 10-02-14.pdf

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October 2, 2014

Mr. Syed Aril
Compliance and Enforcement Administrator
Office of Permitting and Compliance
Florida Department of Environmental Protection
Division of Air Resource Management

Re: Request for Change to the "ALTERNATE STANDARDS FOR LOW GAS PRODUCTION WELLS AND LEACHATE RISERS"
West Nassau Landfill
Landfill Gas Collection and Control System
Title V Air Operations Permit No. 0890428-008-AV
(Draft Title V Air Operation Permit No. 0890428-009-AV)
Nassau County, Florida

Dear Mr. Aril:

Nassau County requests several changes to its existing Alternate Standards Procedures (ASP) for operating low gas production wells and leachate risers as detailed in the attached letter. Nassau County is requesting in the attached letter the following changes to its existing ASP for operating low gas production wells and leachate risers:

1) Title change from "Alternate Standards for Low Gas Production Extraction Wells and Leachate Cleanout Riser Connections" to "Alternate Standards for Low Gas Production Extraction Wells";
2) Language for the revised ASP be based on the procedures provided by USEPA's Control Number 0900064 provided in Attachment 2 of this letter and not the existing ASP language (see attached for requested replacement language);
3) Well Nos. LCR-2, 3, and 6 should be removed from compliance with this ASP since a new procedure was approved by the Department for the leachate cleanout risers under "Request 14-U-AP Leachate Collection Cleanout Risers – Oxygen Intrusion";
4) Well No. GW-48 remains in compliance with this procedure since it is a low producing well; and

5) Once approved by the Department, the approved ASP be submitted to Ms. Tammy McWade, Office of Permitting and Compliance (OPC), Division of Air Resource Management (DARM), so the revised ASP for low production extraction wells along with the ASP "Request 14-U-AP Leachate Collection Cleanout Risers – Oxygen Intrusion" replaces the language in Appendix AS of the draft Title V Air Operation Permit No. 0890428-009-AV.

We also attached the requested ASP language in word format to assist the Department in it review process.

Let us know if you have any questions.

Omar E. Smith, P.E., V.P.
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