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MAY 14 2007

BUREAU OF AIR REGULATION

11 May 2007

Mr. Al Linero
Bureau of Air Regulation (Permitting South)
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

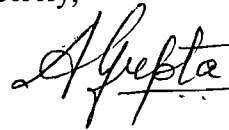
Subject: Response to First Request for Additional Information
FDEP File No. 0970079-004-AC
Air Construction Permit Application for Phases 2 and 3
Oak Hammock Disposal Facility
Osceola County, Florida

Dear Mr. Linero:

Please find four copies of the responses to the 1st request for additional information related to the above referenced permit application. Geosyntec is submitting this application on behalf of Omni Waste of Osceola County, LLC (a wholly owned subsidiary of Waste Services, Inc.).

If you have any questions or need additional information, please do not hesitate to contact the undersigned.

Sincerely,



Ayushman Gupta, P.E.
Senior Engineer

Enclosure

11 May 2007

Mr. Al Linero
Bureau of Air Regulation (Permitting South)
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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FDEP File No. 0970079-004-AC
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BUREAU OF AIR REGULATION

Dear Mr. Linero:

Geosyntec Consultants (Geosyntec) has prepared this letter on behalf of Omni Waste of Osceola County, LLC (Omni) to address the first request for additional information (RAI) from the Florida Department of Environmental Protection (FDEP) on the above-referenced permit application. The Air Construction Permit Application was submitted for the construction of Phases 2 and 3 at the Oak Hammock Disposal (OHD) facility in Osceola County, Florida. The RAI was addressed to Mr. McCash in a letter dated 13 April 2007, which is included in Attachment 1.

This response is intended to supplement the Air Construction Permit Application submitted in March 2007. Each RAI has been reproduced in italic font below and the response to the RAI is given in normal font. Four copies of the responses to the first RAI are being provided to FDEP.

FDEP Comment

1. Please update the original Table 1 that shows the emissions of all criteria pollutants during the operating life and the post-closure life of this facility (30 years). Recalculate the year to which the 250 tons per year (TPY) of CO is expected to be emitted. What other pollutant is anticipated to reach the 250 TPY threshold?

Response

Table 1 included in Attachment 2 presents the mass emission rates for the criteria pollutants for the operating and post-closure life of the facility. As noted, the CO emissions exceed 250 TPY in the 9th year of operation (i.e., in 2012) for the assumed waste disposal rate at the OHD facility. No other pollutant is expected to reach the threshold of 250 TPY.

Geosyntec requests that the maximum emission limits for the criteria pollutants noted in the permit be revised to correspond to the maximum emission rates noted in Table 1.

FDEP Comment

2. *Submit a report indicating the waste composition received since the opening of this site. What is the actual % of construction and demolition (C&D) waste, of Class III waste? What is the anticipated % rate of C&D and Class III waste expected for this landfill for Phases I through III?*

Response

Waste composition for the waste received at the OHD facility in 2004, 2005, and 2006 is included in Table 2 in Attachment 2. As noted in the Table 2, the percentage of C&D waste ranged from approximately 5 to 10 percent during the three years of operation at the OHD facility. The percentage of Class III waste was approximately 7 percent. The C&D and Class III waste stream combined together (as a percentage of the total waste accepted at the OHD facility) ranged from approximately 10 to 12 percent during the three years of operation at the OHD facility.

There are no specific plans to change the operations at the facility at this time. Assuming the landfill continues to operate in a similar manner, the C&D and Class III waste streams (as a percentage of the total waste accepted at the OHD facility) are likely to be in approximately the same range as in the first three years of operation.

FDEP Comment

3. *Please note that the generation of sulfurous gases from landfills greatly exceeds estimates based on standard factors such as those given in EPA publication AP-42. As a result SO₂ emissions from flares and engines burning the gas can be very substantial. What current plans do you have to control potential SO₂ emissions? Does the landfill*

currently measure H₂S content of the landfill gas? If so, at what frequency is it measured and where is it measured.

Response

As noted in the response to Comment #2 above, only a small percentage of the total waste accepted at the OHD facility C&D and Class III waste. As a result, SO₂ emissions are not expected to be substantially different than those computed using AP-42. However, if the SO₂ emissions are substantially higher, appropriate pre-treatment options will be evaluated to minimize SO₂ emissions.

The installation and operation of the proposed GECS system will begin at the OHD facility in 2008. The landfill gas samples will be collected and the constituents will be evaluated once the GECS is installed. The landfill gas constituents are not measured at this time.

FDEP Comment

4. Have any decisions been made regarding the design of the first two (2) already permitted flares.

Response

The two permitted flares at the facility have not yet been designed. However as noted above, the installation and operation of the gas extraction and control system (GECS) will begin next year (2008). The flares will be designed as part of the detailed design of the GECS.

FDEP Comment

5. Would the solid waste disposed during Phases I, I and III exceed the 8,000,000 tons? See Specific Conditions No. 3 of Permit 0970079-001-AC.

Response

As noted in Table 2 in Attachment 2, the total waste accepted at the OHD facility during the three years of operation (i.e., through end of 2006) was approximately 2.8 million tons. The average waste disposal rate in the future years (2007 onwards) is expected to be approximately 6,000 tons/day (with no more than 4,000 tons/day of

Mr. Al Linero
11 May 2007
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degradable waste). The landfill operates for 5.5 days/week or 286 days/year. An average waste disposal rate of 6,000 tons/day corresponds to approximately 1.7 million tons per year and approximately 8.6 million tons over the next 5 years. Therefore, at the end of next 5 years (the duration of the permit) the total solid waste disposed at OHD facility is expected to be approximately 11.4 million tons.

Geosyntec requests that Specific Condition No. 3 of the Permit 0970079-001-AC be modified accordingly.

Closure

If you have any questions or need additional information, please do not hesitate to contact the undersigned.

Sincerely,



Ayushman Gupta, P.E.
Senior Engineer

Attachments

Copy to: Shawn McCash, WSI/Omni
Mike Kaiser, WSI/Omni

ATTACHMENT 1

**FDEP'S RAI #1
DATED 13 APRIL 2007**



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 13, 2007

Electronically sent – Received Receipt requested.

smccash@wsii.us

Mr. R. Shawn McCash, Authorized Representative
Omni Waste of Osceola County, LLC
1501 Omni Way
St. Cloud, Florida 34773

Re: Request for Additional Information
DEP File No. 0970079-004-AC
Phase II and III Oak Hammond Disposal (OHD) Facility

Dear Mr. McCash:

On March 20, 2007 we received your application for an air construction permit to expand the gas collection and extraction system (GECS) for Phases II and III of the Oak Hammond Disposal facility. It is our understanding that this request is limited to the GECS expansion and that no flares, except the two originally permitted with Phase I, are going to be installed as a result of this permitting action.

Pursuant to Rules 62.296.340 (2), 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information prior to processing the application. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please update the original Table 1 that shows the emissions of all criteria pollutants during the operating life and the post-closure life of this facility (30 years). Recalculate the year to which the 250 tons per year (TPY) of CO is expected to be emitted. What other pollutant is anticipated to reach the 250 TPY threshold?
2. Submit a report indicating the waste composition received since the opening of this site. What is the actual % of construction and demolition (C&D) waste, of Class III waste? What is the anticipated % rate of C&D and Class III waste expected for this landfill for Phases I through III?
3. Please note that the generation of sulfurous gases from landfills greatly exceeds estimates based on standard factors such as those given in EPA publication AP-42. As a result SO₂ emissions from flares and engines burning the gas can be very substantial. What current plans do you have to control potential SO₂ emissions? Does the landfill currently measure H₂S content of the landfill gas? If so, at what frequency is it measured and where is it measured.

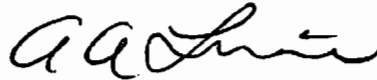
Mr. R. Shawn McCash
April 13, 2007
Page 2 of 2

4. Have any decisions been made regarding the design of the first two (2) already permitted flares.
5. Would the solid waste disposed during Phases I, I and III exceed the 8,000,000 tons? See Specific Conditions No. 3 of Permit 0970079-001-AC.

We will forward any comments received from other agencies as soon as we receive them. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please advise the professional engineer to make sure he/she uses the correct seal in compliance with the applicable requirements of the Florida Board of Professional Engineers.

Permit applicants are advised that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days. If there are any questions, please call Teresa Heron at 850/921-9529.

Sincerely,



A.A. Linero, Program Administrator
Bureau of Air Regulation
Permitting South

AAL/th

cc: R. Shawn McCash, OMNI: smccash@wsii.us
Ayushman Gupta, GeoSyntec: agupta@geosyntec.com
Jim Bradner, DEP Central Office: jim.bradner@dep.state.fl.us

ATTACHMENT 2

TABLES 1 AND 2

TABLE 1

MASS EMISSION RATES FOR CRITERIA POLLUTANTS (tons/yr)

	Year No.	At End of Year	GECS INSTALLED IN FIFTH YEAR OF LANDFILL OPERATION					WITHOUT GECS (UNCONTROLLED EMISSIONS)				
			CO	TRS as S or SO ₂	PM	VOC	NO _x as NO ₂	CO	TRS as S	PM	VOC	NO _x as NO ₂
OPERATING LIFE	1	2004	0.5	0.2	NA	2.1	NA	0.5	0.2	NA	2.1	NA
	2	2005	1.0	0.4	NA	4.9	NA	1.0	0.4	NA	4.9	NA
	3	2006	2.0	0.7	NA	9.1	NA	2.0	0.7	NA	9.1	NA
	4	2007	3.2	1.2	NA	14.7	NA	3.2	1.2	NA	14.7	NA
	5	2008	133.8	3.3	3.0	5.1	7.2	4.3	1.7	NA	20.1	NA
	6	2009	168.5	4.2	3.8	6.5	9.1					
	7	2010	201.7	5.0	4.5	7.8	10.8					
	8	2011	233.7	5.8	5.2	9.0	12.6					
	9	2012	264.4	6.5	5.9	10.2	14.2					
	10	2013	293.9	7.3	6.6	11.3	15.8					
POST-CLOSURE	11	2014	282.4	7.0	6.3	10.9	15.2					
	12	2015	271.3	6.7	6.1	10.4	14.6					
	13	2016	260.7	6.4	5.8	10.0	14.0					
	14	2017	250.5	6.2	5.6	9.6	13.5					
	15	2018	240.7	5.9	5.4	9.2	12.9					
	16	2019	231.2	5.7	5.2	8.9	12.4					
	17	2020	222.2	5.5	5.0	8.5	11.9					
	18	2021	213.4	5.3	4.8	8.2	11.5					
	19	2022	205.1	5.1	4.6	7.9	11.0					
	20	2023	197.0	4.9	4.4	7.6	10.6					
	21	2024	189.3	4.7	4.2	7.3	10.2					
	22	2025	181.9	4.5	4.1	7.0	9.8					
	23	2026	174.8	4.3	3.9	6.7	9.4					
	24	2027	167.9	4.1	3.7	6.5	9.0					
	25	2028	161.3	4.0	3.6	6.2	8.7					
	26	2029	155.0	3.8	3.5	6.0	8.3					
	27	2030	148.9	3.7	3.3	5.7	8.0					
	28	2031	143.1	3.5	3.2	5.5	7.7					
	29	2032	137.5	3.4	3.1	5.3	7.4					
	30	2033	132.1	3.3	2.9	5.1	7.1					

Note:

The operating life of OHDF landfill is approximately 10 years.

NA = Not Applicable. NO₂ and PM are not landfill gas constituents and are generated only by the flare(s).

TABLE 2

2004 J.E.D. Material Trend																	
Tons / Count	Jan	Feb	Mar	2004 Q1	April	May	June	2004 Q2	July	Aug	Sept	2004 Q3	Oct	Nov	Dec	2004 Q4	2004 YTD Total
Auto Fluff	484	1,224	1,632	3,340	2,941	2,668	2,194	7,803	5,583	7,392	5,170	18,145	5,273	4,132	3,945	13,349	42,638
C&D	-	118	1,983	2,102	1,648	1,388	1,058	4,095	1,087	2,580	2,005	5,673	3,904	9,495	10,133	23,532	35,401
Clean Fill	-	-	-	-	18	136	148	301	435	2,227	-	2,662	-	-	17	17	-
Cont. Soil	-	343	2,046	2,389	4,137	1,614	3,358	9,109	9,432	6,751	4,055	20,237	5,297	3,058	5,863	14,218	-
Certified Weight	-	-	-	-	-	1	1	1	1	0	-	1	1	0	-	1	-
Mulch	-	-	-	-	-	-	-	-	-	-	-	-	48	22,634	37,658	60,341	-
MSW	2,918	14,931	19,660	37,509	19,038	17,582	18,334	54,954	9,803	23,400	25,897	59,100	23,619	16,893	16,135	56,647	208,209
Sludge	-	961	2,098	3,059	2,285	1,555	1,095	4,934	659	671	898	2,228	922	1,177	3,632	5,731	15,953
Special Waste	-	152	655	807	670	1,594	911	3,175	647	3,557	5,661	9,865	11,684	13,738	9,015	34,438	48,285
Tires	-	-	35	35	4	7	15	26	3	6	3	12	6	-	23	29	102
White Goods	-	1	2	3	2	6	5	13	2	-	17	19	6	6	10	22	57
Yard Waste	-	-	0	0	1	11	0	12	2	10	2	14	8	2	2	12	38
Total	3,402	17,731	28,112	49,245	30,744	26,561	27,119	84,424	27,653	46,595	43,709	117,957	50,768	71,136	86,433	208,337	350,684

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2005 J.E.D. Material Trend																	
Tons / Count	Jan	Feb	Mar	2005 Q1	April	May	June	2005 Q2	July	Aug	Sept	2005 Q3	Oct	Nov	Dec	2005 Q4	2005 YTD Total
Auto Fluff	3,824	3,624	4,690	12,137	3,003	3,167	5,050	11,220	2,374	2,930	2,837	8,141	3,962	6,096	6,732	16,790	48,289
C&D	5,454	2,056	2,815	10,325	3,570	3,252	2,465	9,287	3,424	3,222	2,741	9,388	2,734	3,716	6,439	12,889	41,889
Cont. Soil	4,014	6,767	11,716	22,497	17,866	12,741	13,477	44,083	13,909	24,039	9,310	47,258	9,143	28,576	32,803	70,522	184,361
Class III waste	-	-	3,345	3,345	3,470	5,526	6,667	15,662	10,581	9,970	7,842	28,393	5,122	3,927	3,136	12,185	59,585
Mulch	5,841	849	-	6,690	-	-	-	-	-	-	-	-	-	-	-	-	6,690
MSW	16,243	15,340	17,522	49,106	18,524	22,871	37,715	79,110	35,778	41,699	36,434	113,911	40,060	44,957	49,392	134,409	376,535
Sludge	3,625	3,478	3,957	11,060	3,734	3,749	5,466	12,949	8,493	10,202	7,910	26,606	8,958	8,588	9,975	27,521	78,135
Special Waste	8,283	2,833	2,446	13,562	2,848	933	2,224	6,006	1,264	1,636	978	3,878	1,171	693	2,850	4,714	28,160
Miscellaneous	20	8	10	38	307	62	9	378	15	3	9	27	77	19	59	155	599
Total	47,304	34,955	46,500	128,759	53,321	52,302	73,072	178,695	75,839	93,702	68,062	237,602	71,227	96,572	111,386	279,185	824,242

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2006 J.E.D. Material Trend																	
Tons / Count	Jan	Feb	Mar	2006 Q1	April	May	June	2006 Q2	July	Aug	Sept	2006 Q3	Oct	Nov	Dec	2006 Q4	2006 YTD Total
Auto Fluff	5,309	6,812	6,230	18,351	7,463	7,408	7,345	22,215	7,568	7,377	9,261	24,206	9,401	8,294	6,087	23,782	88,555
C&D	2,840	2,583	3,968	9,391	2,815	3,595	4,616	11,026	4,094	7,680	8,558	20,332	10,495	10,117	8,982	29,594	70,343
Cont. Soil	13,178	23,221	39,455	75,854	29,989	18,205	52,711	100,904	35,072	47,755	39,781	122,608	26,544	51,057	55,147	132,748	432,114
Class III waste	7,346	7,501	10,747	25,593	10,244	8,653	10,027	28,924	9,573	9,499	10,028	29,100	8,854	8,829	7,544	25,227	108,844
Mulch	-	-	-	-	-	-	-	-	-	3	1	4	-	2	2	4	8
MSW	48,666	44,666	48,806	142,138	41,570	45,623	48,951	136,144	45,524	44,421	46,157	136,102	44,867	53,985	53,201	152,053	566,437
Sludge	8,594	9,720	12,721	31,035	11,033	10,104	10,379	31,515	8,575	9,153	8,820	26,548	11,257	8,392	9,262	28,911	118,009
Special Waste	1,809	9,996	26,603	38,408	7,914	22,728	42,808	73,450	21,261	5,369	2,684	29,314	2,107	8,341	1,479	11,927	153,099
Miscellaneous	19	22	27	68	12	54	13	80	3	54	187	244	440	64	10	514	906
Total	87,761	104,520	148,558	340,839	111,040	116,369	176,849	404,258	131,671	131,311	125,477	388,459	113,965	149,081	141,714	404,760	1,538,316

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