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PSD - FL - 429

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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DIVISION OF AIR
RESOURCE MANAGEMENT

August 4, 2014

Scott M. Sheplak, P.E.
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Subject: Comments on the Proposed PSD permit for J.E.D. Solid Waste
Permit No. PSD-FL-429

Dear Mr. Shelpak:

Below are the comments from the United States Environmental Protection Agency - Region 4 on the above referenced source. The comments below are for an application received on May 15, 2014. The following are our review comments on the JED Solid Waste Management Facility air quality impact assessment provided in support of the modification Prevention of Significant Deterioration (PSD) Permit application. The permit application will involve the installation of flares to accommodate the landfill gas generation (LFG) potential of the landfill and the installation of a landfill gas-to-energy (LFGTE) plant that will use a portion of the LFG generated by the landfill. The LFGTE plant will have a gross electrical generation capacity of 19.2 megawatts of electricity and will consist of twelve Caterpillar Model G3520C lean-burn internal combustion engines and generator sets. We reviewed some Class I modeling files.

In order to ensure that the project meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily assessable to the public, and that the permit record provides adequate support for the decision, the EPA has the following comments:

2.2 Project Overview

2.2.3 H₂S Scrubbing

Omni states that it will likely go with a biological conversion to sulfate that is believed to be the most cost effective. It further states that in Phase 1 the system will treat to achieve a concentration of <160 ppmw. Then in Phase 2 it will expand the system for a treated concentration of <65 ppmw.

EPA Response

It is recommended that a more complete explanation of how the system will be expanded to achieve the additional reduction in concentration. It is also recommended that the time between each phase is included with a project timeline.

Appendix G Application Forms

List of Pollutants emitted by facility

PM, PM10, PM2.5, NO_x, CO, VOC, NMOC

EPA Response -

In the FDEP application, the facility does not list SO₂ on the list of pollutants emitted by the facility. SO₂ is shown in F1. Emissions unit pollutant detail information.

Modeling Comments:

In the April 2014 JED Solid Waste Management Facility PSD Permit Modification application, Section 3.2.4 Source Impact Analysis on page 19 has no secondary PM_{2.5} discussion. The PM_{2.5} Significant Impact Area (SIA) analysis only addresses direct emissions of PM_{2.5}. NO_x emissions are considered a precursor to PM_{2.5} secondary formation. Since the NO_x emissions are greater than the Significant Emission Rate (SER) of 40 tons/year, secondary PM_{2.5} impacts should be addressed in the PM_{2.5} impact assessment. On March 4, 2013, the EPA issued draft guidance that contained recommended procedures to address secondary PM_{2.5} impacts. Since this draft guidance was released, the EPA has recommended permit applications include secondary PM_{2.5} impacts when precursor emissions exceed the applicable SER. A revised PM_{2.5} impact assessment should be provided that includes secondary PM_{2.5} impacts.

On May 20, 2014, the EPA released the revised Guidance for PM_{2.5} Permit Modeling (available on EPA's Support Center for Regulatory Atmospheric Modeling (SCRAM) website: <http://www.epa.gov/scram001/>). The EPA is now recommending that this revised guidance be used for addressing potential secondary PM_{2.5} impacts. Section 3.2 of this guidance discusses the EPA's recommended methodology for addressing potential secondary impacts in the Significant Impact Analysis.

Additionally, as discussed in Section V.3, page 72, of the EPA's Guidance for PM_{2.5} Permit Modeling, the comparison of background concentrations and the National Ambient Air Quality Standards as is presented in Table 6-8, does not by itself provide adequate justification for foregoing a cumulative modeling analysis for PM_{2.5} increments. Recommended procedures for the screening analysis are provided in this Section V.3 of the guidance.

If you have any questions regarding these comments or need additional information, feel free to contact Natasha Hazziez at 404-562-8409 or email to hazziez.natasha@epa.gov or Richard Monteith at 404-562-8949 or via email at monteith.richard@epa.gov.

Sincerely,



Heather M. Ceron
Chief
Air Permits Section