

MEMORANDUM

TO: CR 466A Landfill Facility, LLC's permit file 1190036-004-AO

FROM: Jim McDonald JMV

DATE: 11/26/2008

The next time there is permitting action, change the project description to say the wall under the manifold is concrete and the other 3 sides have vertical steel sheets.

# **Application Routing and Transmittal Sheet (AO/AF)**

<b>Air Permitting Supervisor - Required Information for Project Setup by Admin</b>			
Owner/(Facility Name, if needed):	C.R. 466-A Landfill Facility		
Facility ID No.:	1190036		
Project Name:	Operation Permit Renewal		
Project Description:	Operation Permit Renewal		
Facility Type:	<input type="checkbox"/> New <input type="checkbox"/> Relocatable	Total Fee Submitted (\$):	1000
Type/Subtype:	AO2B	Total Fee Required (\$):	1000
Date Received:	10/22/07	Net Fee Needed (\$):	0
Fee Status:	<input checked="" type="checkbox"/> Correct <input type="checkbox"/> Incorrect <input type="checkbox"/> NA	Net Fee Refund (\$):	0
Fee Checked By:	cz	Fee override reason: (if needed)	none
Date Fee Checked:	10/23/07		

<b>Admin - Project Setup Information</b>			Permit Number:
Project Number:	004	Initial ARMS Entry	1190036-004-AO
Date:	10/24/07	Initials:	SW

<b>Air Permitting Supervisor - Application Information</b>					
Application Assigned To:	McDonald_J	No. of Hardcopies:	4	Copies issued to DEP Engineer:	4
Date Assigned:	10/23/07	No. of Disk:	0	Copies issued to County:	na
Confidential Information (Y/N):		EPSAP (Y/N):	n	Copies issued to other:	na

<b>Compliance/Enforcement Review (review marked by supervisor)</b>	
Permit Supervisor - Email sent for application review/comments:	10/23/07
Permit Supervisor - Copy of transmittal sheet to Bret Galbraith (new facility)? (Y/N):	n
Permit Supervisor - Draft Permit Review? (Y/ED):	ed

<b>Air Permitting - Permit Transmittal (add initials &amp; date completed)</b>					
	Intent / Draft		Final		
Permit Clock Dates	Day 30:	Day 90:	Day 30:	Day 90:	
Zipfile Name On Air Common *			1190036.004.AO.5.CR466.ZIP		
Final Permit Name On Air Common *			1190036.004.AO.5.CR466.doc		
Engineer → Permit Reviewer					
Permit Reviewer → Permit Supervisor			jm 3-6-08		
Permit Supervisor → DAPA			4 3/10/08		
DAPA → Clerk/Engineer			MON 03-17-08		
Permit Package Mailed / Emailed			DD 03-17-08		
Arms Event Entry			DD 03-17-08		
Copy to Interested Party (Y/N)					
Posted to DEP Website			DD 03-17-08		
ARMS Inventory Data Entry:	1-22-08 jm		Permitting Clerk:	DD 03-17-08	

\* Air\_Common\Permitting\Permits\PermitXX\

<b>Air Permitting Supervisor - Data Fields for Access System (add at final Issuance)</b>			
Issue Date:		296	401
Facility Description:	INCINERATOR (NON-GENERATOR)	MACT	
Source Description:	INCINERATOR (AIR CURTAIN)	NSPS	CCCC
Control Equipment:		FUELS:	
Project Description / Comments:			
Permit Clerk - Permit List Data Entry (Access):	DD 03-17-08		

<b>Special Routing</b>	
Permitting Supervisor - Engineer to send final permit to compliance section (Y/N):	y

<input checked="" type="checkbox"/> Application Log	<input checked="" type="checkbox"/> Fee Verification in ARMS	<input checked="" type="checkbox"/> Deadline Check	<input checked="" type="checkbox"/> Project ID
-----------------------------------------------------	--------------------------------------------------------------	----------------------------------------------------	------------------------------------------------

Florida Department of Environmental Protection - Enterprise Applications

Query Edit Print Find Enter Window

Cash Receiving Application - Collection Point Log Remittance

CL AREA **SWD** Logged Total **CRAF006A \$1,000.00**

**Collection Point Log Remittance**

Remittance ID **752557** Type **OP** Received Date **10/22/2007** Status **RECEIVED**

System Receipt **604864** PNR **PNR** Check # **2850** Amount **1,000.00**

SSN/FEID **PNR** Name **C.R. 466A LANDFILL FACILITY**

First **PNR** Middle **PNR** Title **PNR** Suffix **PNR**

Address1 **PO BOX 490697**

Address2 **PNR**

City **LEESBURG** ST **FL** Zip **34749 -0697**

Country **PNR** Short Comments **AIR 1190036-004**

**PAYMENT (\$)**

Payment ID	CL Area	Code/Description	Payment Amount	Reference#	Appl	Fund*	Status
<b>845182</b>	<b>SWD</b>	<b>802223 AIR OPERATE</b>	<b>\$1,000.00</b>		<b>AREA</b>	<b>PFTF</b>	<b>COMPLETE</b>

**COMMIT FREQUENTLY** **\$1,000.00** Payment Total

Press F10 to accept Collection Point Log Remittance

Florida Department of Environmental Protection - Enterprise Applications

Permits Events Payment PERMIT Data Entry Site Facility Permitted EME Party Application ETC

Permitting Application - Permit Detail and Log Permit

**ARMS Facility**

POINT **SWD** AIRS ID **1190036** STATUS **A** OFFICE **SWD** SW: TAMPA

SITE NAME **C.R. 466-A C&D LANDFILL FACILITY** COUNTY **SUMTER**

OWNER/COMPANY **C.R. 466-A LANDFILL L.L.C.**

**Project**

AIR Permit # **PNR** Project # **004** CRA Reference # **300052**

Permit Office **SWD (DISTRICT)** Agency Action **Pending**

Project Name **OPERATION/PERMIT RENEWAL** Desc **Operation permit renewal**

Type/Sub/Des **AO / 2B Minor Source - Other Sample \$1000** Logged **10/24/2007**

Received **10/22/2007** Issued **PNR** Expires **PNR** OGC **PNR**

Fee **1000.00** Fee Recd **1000.00** Date **PNR** Override **NONE**

**Related Party**

Role **APPLICANT** Begin **10/24/2007** End **PNR**

Name **HEWITT, HOWARD H** Company **C.R. 466-A LANDFILL, L.L.C.**

Address **P.O. BOX 490697**

City **LEESBURG** State **FL** Zip **34749 -0697** Country **U.S.A.**

Phone **352-787-6551** Fax **PNR**

**Processors**

Processor **MCDONALD\_J** Y Active **10/24/2007** Inactive **PNR** Events **PNR**

Enter Project Name

start

Permitting Application - Events

Events Scheduled 56 of 90

AIRS ID: 1190036 Site Name: C.R.466A C&D LANDFILL FACILITY

Permit #: 1190036-004-AO Type/Subtype: AO / 2B Received: 10/22/2007

Project #: 004 Project Name: (OPERATION PERMIT RENEWAL)

> ARMS Data Entry: Done

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
RESET CLOCK	11/06/2007	1	11/07/2007		Done	11/06/2007
Awaiting Additional Information	11/06/2007	45	12/21/2007		Received	11/15/2007
Completeness Review	11/15/2007	30	12/15/2007		Incomplete	12/03/2007
RESET CLOCK	12/03/2007	1	12/04/2007		Done	12/03/2007
Awaiting Additional Information	12/03/2007	93	03/05/2008		Received	02/11/2008
Completeness Review	02/11/2008	30	03/12/2008		Complete	02/11/2008
Determine Agency Action	02/11/2008	90	05/11/2008		Issue	03/17/2008
Issue Final Permit	03/17/2008	14	03/31/2008		Issued	03/17/2008
ISSUE PERMIT	03/17/2008	1	03/18/2008		Issued	03/17/2008
STOP CLOCK	03/17/2008	1	03/18/2008		Done	03/17/2008
ARMS Data Entry	03/17/2008	40	04/26/2008		Done	03/17/2008

Permitting Application - Permit Detail and Log Permit										
<b>ARMS Facility</b>										
POINT	AIRS ID	1190036	STATUS	A	OFFICE	SWD	SW: TAMPA			
SITE NAME		C.R. 466A C&D LANDFILL FACILITY				COUNTY	SUMTER			
OWNER/COMPANY		C.R. 466A LANDFILL FACILITY, L.L.C.								
<b>Project</b>										
AIR Permit #	1190036	-	004	-	AO	Project #	004	CRA Reference #	300852	
Permit Office	SWD (DISTRICT)				Agency Action	Issued		OGC	<input type="checkbox"/>	
Project Name	OPERATION PERMIT RENEWAL				Desc	Operation permit renewal				
Type/Sub/Des	AO	/	2B	Minor Source - Other Sample \$1000				Logged	10/24/2007	
Received	10/22/2007		Issued	03/17/2008		Expires	03/17/2013		Application Action	
Fee	1000.00		Fee Recd	1000.00		Dele		Override	NONE	
<b>Related Party</b>										
Role	APPLICANT				Begin	10/24/2007		End		
Name	HEWITT, HOWARD H				Company	C.R. 466-A LANDFILL, L.L.C.				
Address	P.O. BOX 4900697									
City	LEESBURG				State	FL	Zip	34749 - 0697	Country	U.S.A.
Phone	352-787-5651		Fax							
<b>Processors</b>										
Processor	MCDONALD_J				Y	Active	10/24/2007		Inactive	
									Events	

**Current Permitted Emission Units**

Emission Units currently linked to this permit. Click on "Link EUs" to link more EUs.

EU#	Status	Description
001	A	Air Curtain Incinerator

**Return to 1190036**

**New Search**

Save File as: d:\inetpub\source\air\psum\1190036.004.AO.F.ZIP

File '1190036.004.AO.F.ZIP' was uploaded successfully to appprod.dep.state.fl.us

Permit Summary Record was successfully inserted/updated

## SWD Air Permits

[Users Manual](#)

Facility ID  Owner/Facility Name   
Project Number  Issued  Eng   
Facility Description   
Source Description   
296  MACT  NSPS   
Fuel  Primary Control Equipment

For fuels: ng=natural gas; lg=landfill gas; p=propane; t=tires; uo=used oil; w=wood; c=coal, list allowed fuel oils as a string of #s (ex. 23456)

Project Description/Comment

To add Owner/  
Facility, click below

Add Owner/Facility

To see 296,  
MACT, or NSPS  
codes, click below

296 List

MACT List

NSPS List

Save Record



MEMORANDUM

TO: Cindy Zhang-Torres, P.E.  
Air Permitting Supervisor

FROM: Jim McDonald *JM*

DATE: March 6, 2008

SUBJECT: Recommend permit 1190036-004-AO for C.R. 466A Landfill Facility, L.L.C. be issued.

From the information below, I recommend permit 1190036-004-AO for C.R. 466A Landfill Facility, L.L.C. be issued. Day 90 is May 11, 2008.

On October 22, 2007, the Department received from C.R. 466A Landfill Facility, L.L.C. an air pollution permit renewal application to operate a natural non-Title V air curtain incinerator on the west side of the Sumter/Lake County line and on the south side of C.R. 466A in Sumter County.

The incinerator's maximum permitted charging rate is 1.4 tons/hr. (daily average basis) and 3,500 tons per any consecutive 12-month period. Compliance with these limitations is documented by recordkeeping. {Note: Construction permit 1190036-001-AC limited the charging rate to 1.4 tons/hr. (daily average basis). Construction permit 1190036-003-AC increased the charging rate to 6 tons/hr. (daily average basis). Since the permittee requested the charging rate be reduced back to 1.4 tons/hr. (daily average basis) in a letter dated December 14, 2007, any future request to increase the charging rate up to a maximum charging rate of 6 tons/hr. (daily average basis) would require prior Department approval. The request would be processed by the Air Permitting Section of the Department's Southwest District Office as a permit amendment that would not require a construction modification permit and public notice.}

On November 1, 2007, Bret Galbraith, Joe Graham, and I inspected C.R. 466A Landfill Facility, L.L.C. During the inspection, the following deficiencies were discovered and are referred to enforcement by Bret Galbraith:

1. The manifold of the incinerator was not at the proper angle to provide for an adequate air curtain.
2. Some of the manifold's nozzles were not attached.
3. The pit's four (4) walls were not maintained in a vertical position to ensure a proper air curtain.
4. The pit was open where one of the pit's shorter vertical walls (width) should have been.
5. Ash was built up higher than 1/3 the pit depth.
6. The pit did not have an indicator to show the pit's 1/3 depth.
7. The pit had been transferred to different areas of the landfill and no notices to the Department had been sent as required by Specific Condition No. 39 of operation permit 1190036-002-AO.

After correcting the above deficiencies, C.R. 466A Landfill Facility, L.L.C. conducted a successful visible emission test on January 10, 2008, at a charging rate of 1.4 tons/hr. Michael Celestin witnessed the test.

Since Rule 62-296.401(7), F.A.C. was changed in January of 2007, the renewed permit has updated conditions as mentioned in Specific Condition No. 3 of permits 1190036-002-AO and 1190036-003-AC (one document).

VISIBLE EMISSIONS  
OBSERVATIONS REPORT

Air Curtain Incinerator

C.R. 466-A LANDFILL, L.L.C.  
Sumter County, Florida

Permit Nos. 1190036-002-AO and 1190036-003-AC

Test Date: January 10, 2008  
Report Date: February 8, 2008

Dept. of Environmental  
Protection

FEB 11 2008

Southwest District

Koogler & Associates, Inc.  
4014 N.W. 13th Street  
Gainesville, Florida 32609-1923  
(325) 377-5822

653-07-03



## 1.0 INTRODUCTION

Hewitt Contracting operates an air curtain incinerator located on County Road 466-A in Sumter County, Florida. The incinerator is permitted by FDEP Permit Nos. 1190036-002-AO and 1190036-003-AC.

The air curtain incinerator is a non-relocatable A.B.I. Air Curtain Incinerator, Model F-045. The burning pit of the incinerator is 35 feet long, twelve feet wide and ten feet deep. Emissions from the incinerator are controlled by forced air over and around the burning pit. Visible emissions observations were conducted on the incinerator by Koogler & Associates, Inc. of Gainesville, Florida on January 10, 2008.

The incinerator is subject to requirements of 40 CFR 60, Subpart CCCC and FDEP Rule 62-296.401(7), F.A.C. The maximum permitted material charging rate to the incinerator is 6.0 tons per hour, 24-hour average and the maximum permitted hours of operation are 2500 hours in any consecutive 12-month period.

The opacity of emissions from the air curtain incinerator may not to exceed 35 percent opacity (six-minute average) during the startup period which is defined as the first 30 minutes of operation. Thereafter, the opacity of emissions may not exceed ten percent opacity (six-minute average) during normal operational periods.

To demonstrate compliance with applicable emission limits, Koogler & Associates, Inc. of Gainesville, Florida, inspected the air curtain incinerator and conducted visible emissions observations on the incinerator that was operating at 1.4 tons per hour during the test period. The dimensions of the incinerator and other features of the incinerator conformed to permit conditions.

Visible emissions observations were conducted for the initial 30 minutes of operation during the startup period and 30 minutes of normal operation for a total of 60 minutes of emissions observations. During the startup period, the opacity ranged from zero to 35 percent and averaged 15.6 percent. The highest six-minute average opacity of emissions during the startup period was 27.5 percent. During the normal operation of the incinerator, the opacity of emissions ranged from zero to 20 percent and averaged 1.1 percent. The highest six-minute rolling average opacity of emissions was 3.3 percent.

Based upon the observations made and the tests conducted on January 10, 2008 by Koogler & Associates, it can be concluded that the air curtain incinerator operated by C.R. 466-A Landfill, L.L.C. can operate in compliance with applicable emission limits while charged at a rate of six tons per hour of wood waste.

## Appendix

Calculations

Field Data Sheets

Plant Operating Information

Project Participants

Calculations

KOOGLER AND ASSOCIATES, ENVIRONMENTAL SERVICES				
SUMMARY OF 30 MINUTE VISIBLE EMISSIONS				
PLANT :	HEWITT CONTRACTING - WILDWOOD, FL.			
SOURCE:	AIR CURTAIN INCINERATOR (START UP)			
DATE :	JANUARY 10, 2008			
TIME START:	10:26			
TIME FINISH:	10:56			
RESULTS:				
AVERAGE OPACITY =				15.6 %
MAXIMUM OPACITY =				35.0 %
HIGHEST SIX-MINUTE ROLLING AVERAGE =				27.5 %
OBSERVATIONS:				
SECONDS	0	15	30	45
MINUTES	OPACITY (%)			
1	0	0	0	0
2	0	25	30	30
3	25	25	30	30
4	30	25	25	25
5	30	30	25	30
6	25	25	25	25
7	30	35	25	30
8	25	20	20	20
9	20	25	25	25
10	25	30	30	30
11	30	30	30	25
12	30	30	30	30
13	25	25	25	20
14	30	30	25	25
15	20	20	25	20
16	20	20	20	20
17	15	15	15	15
18	15	15	10	10
19	10	15	10	10
20	10	10	5	20
21	15	15	15	15
22	15	10	10	5
23	5	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	10	0	10
28	10	0	0	0
29	0	0	0	0
30	0	0	0	0

KOOGLER AND ASSOCIATES, ENVIRONMENTAL SERVICES

SUMMARY OF 30 MINUTE VISIBLE EMISSIONS

PLANT : HEWITT CONTRACTING - WILDWOOD, FL.  
 SOURCE: AIR CURTAIN INCINERATOR (START UP)  
 DATE : JANUARY 10, 2008  
 TIME START: 10:26  
 TIME FINISH: 10:56

CALCULATIONS:

	SIX-MINUTE ROLLING AVERAGES OF VISIBLE EMISSIONS			
1	-	-	-	-
2	-	-	-	-
3	-	-	-	-
4	-	-	-	-
5	-	-	-	-
6	-	-	-	21.5
7	22.7	24.2	25.2	26.5
8	27.5	27.3	26.9	26.5
9	26.3	26.3	26.0	25.8
10	25.6	25.8	26.0	26.3
11	26.3	26.3	26.5	26.3
12	26.5	26.7	26.9	27.1
13	26.9	26.5	26.5	26.0
14	26.3	26.7	26.9	27.1
15	27.1	26.9	26.9	26.7
16	26.5	26.0	25.6	25.2
17	24.6	24.0	23.3	22.9
18	22.3	21.7	20.8	20.0
19	19.4	19.0	18.3	17.9
20	17.1	16.3	15.4	15.2
21	15.0	14.8	14.4	14.2
22	14.0	13.5	13.1	12.5
23	12.1	11.5	10.8	10.2
24	9.6	9.0	8.5	8.1
25	7.7	7.1	6.7	6.3
26	5.8	5.4	5.2	4.4
27	3.8	3.5	2.9	2.7
28	2.5	2.1	1.7	1.5
29	1.3	1.3	1.3	1.3
30	1.3	1.3	1.3	1.3



KOOGLER AND ASSOCIATES, ENVIRONMENTAL SERVICES

SUMMARY OF 30 MINUTE VISIBLE EMISSIONS

PLANT : HEWITT CONTRACTING - WILDWOOD, FL.  
 SOURCE: AIR CURTAIN INCINERATOR  
 DATE : JANUARY 10, 2008  
 TIME START: 10:56  
 TIME FINISH: 11:26

RESULTS:

AVERAGE OPACITY = 1.1 %  
 MAXIMUM OPACITY = 20.0 %  
 HIGHEST SIX-MINUTE ROLLING AVERAGE = 3.3 %

OBSERVATIONS:

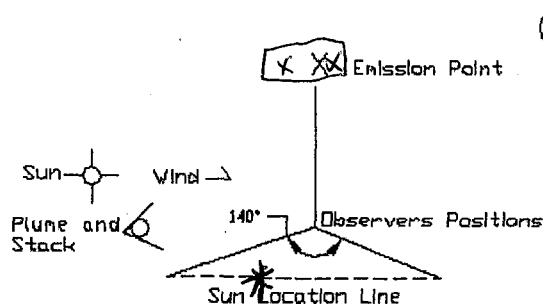
SECONDS	0	15	30	45
MINUTES	OPACITY (%)			
1	0	0	0	0
2	0	0	0	0
3	10	15	15	10
4	0	0	0	0
5	0	0	0	0
6	0	0	0	0
7	0	0	0	0
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	10	15	20	15
18	15	0	5	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29	0	0	0	0
30	0	0	0	0

KOOGLER AND ASSOCIATES, ENVIRONMENTAL SERVICES				
SUMMARY OF 30 MINUTE VISIBLE EMISSIONS				
PLANT :	HEWITT CONTRACTING - WILDWOOD, FL.			
SOURCE:	AIR CURTAIN INCINERATOR			
DATE :	JANUARY 10, 2008			
TIME START:	10:56			
TIME FINISH:	11:26			
CALCULATIONS:				
	SIX-MINUTE ROLLING AVERAGES OF VISIBLE EMISSIONS			
1	-	-	-	-
2	-	-	-	-
3	-	-	-	-
4	-	-	-	-
5	-	-	-	-
6	-	-	-	2.1
7	2.1	2.1	2.1	2.1
8	2.1	2.1	2.1	2.1
9	1.7	1.0	0.4	0.0
10	0.0	0.0	0.0	0.0
11	0.0	0.0	0.0	0.0
12	0.0	0.0	0.0	0.0
13	0.0	0.0	0.0	0.0
14	0.0	0.0	0.0	0.0
15	0.0	0.0	0.0	0.0
16	0.0	0.0	0.0	0.0
17	0.4	1.0	1.9	2.5
18	3.1	3.1	3.3	3.3
19	3.3	3.3	3.3	3.3
20	3.3	3.3	3.3	3.3
21	3.3	3.3	3.3	3.3
22	3.3	3.3	3.3	3.3
23	2.9	2.3	1.5	0.8
24	0.2	0.2	0.0	0.0
25	0.0	0.0	0.0	0.0
26	0.0	0.0	0.0	0.0
27	0.0	0.0	0.0	0.0
28	0.0	0.0	0.0	0.0
29	0.0	0.0	0.0	0.0
30	0.0	0.0	0.0	0.0

Field Data Sheets

SOURCE NAME <i>Hewitt Contracting</i>	
ADDRESS <i>CR 466A Land fill</i>	
CITY <i>Wildwood</i>	STATE <i>FL</i>
ZIP <i>34785</i>	
PHONE <i>352-267-0197</i>	SOURCE ID NUMBER <i>1190036-002-A0</i>
PROCESS EQUIPMENT <i>Air Curtain Inc.</i>	OPERATING MODE
CONTROL EQUIPMENT	OPERATING MODE
DESCRIBE EMISSION POINT START <i>Pit Area</i> STOP <i>same</i>	
HEIGHT ABOVE GROUND LEVEL START <i>4'2"</i> STOP <i>4'2"</i>	HEIGHT RELATIVE TO OBSERVER START <i>8'2"</i> STOP <i>8'2"</i>
DISTANCE FROM OBSERVER START <i>30'2"</i> STOP <i>30'2"</i>	DIRECTION FROM OBSERVER START <i>290°</i> STOP <i>290°</i>
DESCRIBE EMISSIONS START <i>Clear</i> STOP <i>Clear</i>	
EMISSION COLOR START <i>Clear</i> STOP <i>Clear</i>	PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START <i>Top of Pit</i> STOP <i>same</i>	
DESCRIBE BACKGROUND START <i>Dirt</i> STOP <i>same</i>	
BACKGROUND COLOR START <i>Yellow</i> STOP <i>same</i>	SKY CONDITIONS START <i>Clear</i> STOP <i>Clear</i>
WIND SPEED START <i>0-1</i> STOP <i>0-1</i>	WIND DIRECTION START <i>Vari</i> STOP <i>Vari</i>
AMBIENT TEMP. START <i>75</i> STOP <i>75</i>	WET BULB TEMP <i>70</i>
	RH. percent <i>78</i>

Draw North Arrow



COMMENTS <i>Start up</i>	
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE	
TITLE	DATE

OBSERVATION DATE <i>1-10-08</i>					START TIME <i>1026</i>	STOP TIME <i>1056</i>
SEC MIN	0	15	30	45	COMMENTS	
1	0	0	0	0	<i>start up</i>	
2	0	25	30	30		
3	25	25	30	30		
4	30	25	25	25		
5	30	30	25	30		
6	25	25	25	25		
7	30	35	25	30		
8	25	20	20	20		
9	20	25	25	25		
10	25	30	30	30		
11	30	30	30	25		
12	30	30	30	30		
13	25	25	25	20		
14	30	30	25	25		
15	20	20	25	20		
16	20	20	20	20		
17	15	15	15	15		
18	15	15	10	10		
19	10	15	10	10		
20	10	10	5	20		
21	15	15	15	15		
22	15	10	10	5		
23	5	0	0	0		
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	10	0	10		
28	10	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

OBSERVER'S NAME (PRINT) <i>Rodney PAUL</i>	
OBSERVER'S SIGNATURE <i>Rodney Paul</i>	DATE <i>1-10-08</i>
ORGANIZATION <b>KOOGLER AND ASSOCIATES, INC.</b>	
CERTIFIED BY <i>ETA</i>	DATE <i>11-07</i>

SOURCE NAME <i>Hewitt Contracting</i>	
ADDRESS <i>CR 466 A Landfill</i>	
CITY <i>Waldwood</i>	STATE <i>FL</i>
PHONE <i>352-267-0197</i>	SOURCE ID NUMBER <i>1190036-002-A0</i>
PROCESS EQUIPMENT <i>Air Curtain Inlet</i>	OPERATING MODE <i>14TPH</i>
CONTROL EQUIPMENT	OPERATING MODE
DESCRIBE EMISSION POINT START <i>Pit Area</i> STOP <i>same</i>	
HEIGHT ABOVE GROUND LEVEL START <i>4'2"</i> STOP <i>4'2"</i>	HEIGHT RELATIVE TO OBSERVER START <i>8'2"</i> STOP <i>8'2"</i>
DISTANCE FROM OBSERVER START <i>30'2"</i> STOP <i>30'2"</i>	DIRECTION FROM OBSERVER START <i>290°</i> STOP <i>290°</i>
DESCRIBE EMISSIONS START <i>clear</i> STOP <i>clear</i>	
EMISSION COLOR START <i>clear</i> STOP <i>clear</i>	PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START <i>Top of Pit</i> STOP <i>same</i>	
DESCRIBE BACKGROUND START <i>Dirt</i> STOP <i>same</i>	
BACKGROUND COLOR START <i>Yellow</i> STOP <i>same</i>	SKY CONDITIONS START <i>clear</i> STOP <i>clear</i>
WIND SPEED START <i>0-1</i> STOP <i>0-1</i>	WIND DIRECTION START <i>Vari</i> STOP <i>Vari</i>
AMBIENT TEMP: START <i>75</i> STOP <i>75</i>	WET BULB TEMP <i>70</i>
	RH. percent <i>78</i>
<p>Draw North Arrow</p>	
COMMENTS <i>* Charge</i>	

OBSERVATION DATE <i>1-10-08</i>		START TIME <i>1056</i>		STOP TIME <i>1126</i>
SEC MIN	0	15	30	45
COMMENTS				
1	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
2	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
3	<i>10</i>	<i>15</i>	<i>15</i>	<i>10</i>
4	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
5	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
6	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
7	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
8	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
9	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
10	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
11	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
12	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
13	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
14	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
15	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
16	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
17	<i>10</i>	<i>15</i>	<i>20</i>	<i>15</i>
18	<i>15</i>	<i>00</i>	<i>50</i>	<i>00</i>
19	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
20	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
21	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
22	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
23	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
24	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
25	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
26	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
27	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
28	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
29	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>
30	<i>00</i>	<i>00</i>	<i>00</i>	<i>00</i>

OBSERVER'S NAME (PRINT) <i>Rodney PAUL</i>	
OBSERVER'S SIGNATURE <i>Rodney Paul</i>	DATE <i>1-10-08</i>
ORGANIZATION <b>KOOGLER AND ASSOCIATES, INC.</b>	
CERTIFIED BY <i>ETP</i>	DATE <i>11-07</i>

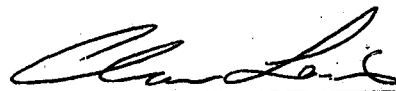
Plant Operating Information

## Process Weight Rate

Owner: Hewitt Contracting  
Date: 1-10-08  
Source: Air curtain Incinerator  
Permit No.: 1190036-002-A0  
Permitted Rate: \_\_\_\_\_

	Time		Input Rate
	From:	To:	
Run No. 1			
Run No. 2			
Run No. 3			
V.E.	From: 1026	To: 1126	1.4 TPH

To the best of my knowledge, the above data is true and correct.

  
Authorized Signature

Manager of Landfill  
Title

HRS  
770.50

Tons  
1974.68

C. R. 466A LANDFILL FACILITY, LLC	
DATE: 1/10/08	
TYPE OF STARTER FUEL USED	5 GAL. FUEL OIL 1 gal
TOTAL CHARGES	
DEFAULT CHARGING RATE AND IDENTIFICATION OF RAKE USED	330 TRACK HOE W/THUMB .375 PER CHARGE
TOTAL MATERIAL (IN TONS) CHARGED	TON 1.4 Tons
DAILY OPERATING (CHARGING) HOURS, WHICH INCLUDES THE START OF INITIAL COMBUSTION TO THE TIME OF THE LAST CHARGE TO THE INCINERATOR (START & STOP TIMES SHALL BE INDICATED)	START: 10:30 1 HRS STOP: 11:30
DAILY, CALCULATE THE HOURLY CHARGING RATE (TONS/HR)	T/HR 1.4 Ton
MONTHLY, PROVIDE THE MOST RECENT CONSECUTIVE 12 MONTH PERIOD TOTAL OF OPERATING (CHARGING) HOURS	HRS 771.50 opacity Test
MONTHLY, PROVIDE THE MOST RECENT CONSECUTIVE 12 MONTH PERIOD TOTAL FOR THE AMOUNT OF MATERIAL CHARGED IN TONS	T 1976.08
TYPE OF MAINTENANCE PERFORMED	GREASED, FUELED, CHECKED BELTS
COMMENTS	BURNED OAK TREES AND WAFER BOARD
BURN PERMIT NUMBER 1190036-001-AC	OPERATOR'S SIGNATURE: Chi B
DATE:	
TYPE OF STARTER FUEL USED	5 GAL. FUEL OIL
TOTAL CHARGES	
DEFAULT CHARGING RATE AND IDENTIFICATION OF RAKE USED	330 TRACK HOE W/THUMB .375 PER CHARGE
TOTAL MATERIAL (IN TONS) CHARGED	TON
DAILY OPERATING (CHARGING) HOURS, WHICH INCLUDES THE START OF INITIAL COMBUSTION TO THE TIME OF THE LAST CHARGE TO THE INCINERATOR (START & STOP TIMES SHALL BE INDICATED)	START: HRS STOP:
DAILY, CALCULATE THE HOURLY CHARGING RATE (TONS/HR)	T/HR
MONTHLY, PROVIDE THE MOST RECENT CONSECUTIVE 12 MONTH PERIOD TOTAL OF OPERATING (CHARGING) HOURS	HRS
MONTHLY, PROVIDE THE MOST RECENT CONSECUTIVE 12 MONTH PERIOD TOTAL FOR THE AMOUNT OF MATERIAL CHARGED IN TONS	T
TYPE OF MAINTENANCE PERFORMED	GREASED, FUELED, CHECKED BELTS
COMMENTS	BURNED OAK TREES AND WAFER BOARD
BURN PERMIT NUMBER 1190036-001-AC	OPERATOR'S SIGNATURE:



Project Participants



## PROJECT PARTICIPANTS

### Koogler & Associates, Inc.

John B. Koogler, Ph.D., P.E. .... Project Advisor  
Steven L. Cloutier ..... Technical Manager  
Neil A. Lofgren, P.E. .... Project Engineer  
Rodney Paul ..... Field Test Crew

### C.R. 466A Landfill Facility, L.L.C.

Clarence Lewis ..... Director, Landfill Operations

### Florida Department of Environmental Protection (FDEP)

Michael Celestin ..... EES I

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

**RODNEY C PAUL**

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue.

11/28/2007	357353
DATE OF SCHOOL	CERT NUMBER
JACKSONVILLE, FL	PAU820385
SCHOOL LOCATION	STUDENT ID NUMBER

## EASTERN TECHNICAL ASSOCIATES

**RODNEY C PAUL**

PAU820385 STUDENT ID NUMBER

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.

JACKSONVILLE, FL	11/28/2007	357353
SCHOOL LOCATION	DATE OF SCHOOL	CERT NUMBER
JAXS04	5/29/2008	
LAST LECTURE	EXPIRATION DATE	BEARER

Customer Support  
Debbie or Sheila

919-878-3188

[www.eta-is-opacity.com](http://www.eta-is-opacity.com)

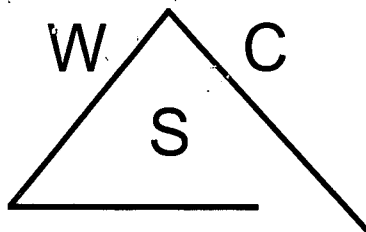
## McDonald, Jim

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**From:** Celestin, Michael  
**Sent:** Monday, January 14, 2008 4:35 PM  
**To:** McDonald, Jim; Galbraith, Bret  
**Subject:** updated inspection finally available

Jim,  
The inspection for the CR 466 ACI (AIRS ID# 1190036) is available on air common in addition to the inspection pictures. Point your browser to: G:\Mike Celestin\Inspections\Sumter\1190036 - CR446 aka Hewitt Construction to find all the related files. As an important note, the facility address has finally been recovered and the lat/long in ARMS has been confirmed. Please make note of this for future permitting endeavors.

Michael E. Celestin  
Engineering Specialist I  
Florida Department of Environmental Protection  
Division of Air Resources  
Phone: 813.632.7600 x122  
Fax: 813.632.7668



# WICKS CONSULTING SERVICES, INC.

OFFICE: (352) 343-8667 • FAX: (352) 343-8665 • E-MAIL: admin@wicksconsulting.com  
225 West Main Street • Tavares, Florida 32778-3811

CERTIFIED MAIL

December 24, 2007

Ms Cindy Zhang-Torres, P.E.  
District Air Permitting Supervisor  
Florida Department of Environmental Protection  
13052 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Rec'd  
12-31-07  
Jm

REF: REQUEST FOR ADDITIONAL INFORMATION  
CR 466-A Landfill Facility, L.L.C. – Sumter County  
Permit No. 1190036-002-AO; DEP File No. 1190036-004-AO

Dear Ms. Zhang-Torres:

We have received your letter addressed to Mr. Howard Hewitt dated December 3, 2007, regarding the project noted above. At his request we have prepared the following response to your numerical items.

1. *Request No. 1.A. of the Department's letter dated November 6, 2007, states: "Previous applications submitted and your Operations Guidelines Manual state the manifold's nozzles will be at a 20° angle to ensure a proper air curtain. The manifold's nozzles (spouts) were not at a 20° angle from the horizontal or vertical direction. Your response should include updating your Operations Guidelines Manual and clarify if the angle is determined from the horizontal or vertical direction."*

*Your additional information did not include an updated page from your Operations Guidelines Manual or explain your Operations Guidelines Manual was updated to say the 20° angle is determined from either the vertical or horizontal. Please provide the updated page or explanation.*

**RESPONSE:** The 20° angle questioned by the Department is from the horizontal plane of the ACI manifold. The Operations Guidelines Manual (the Manual) has been revised to state this. 3 copies of Revised Page 1 of the Manual is attached.

2. *Request No. 3 of the Department's letter dated November 6, 2007, states: "Page 3 of your Operations Guidelines Manual states the incinerator's charging rate shall not exceed 1.4 tons/hr. (daily average basis), instead of 6 tons/hr. (daily average basis). Please submit a revised page 3 of the manual to incorporate this change."*

*Your response still states the charging rate shall not exceed 1.4 tons/hr. (daily average basis). Was the value 1.4 just a typographical error or are you requesting your permit be revised back to 1.4 tons/hr. verses the current permitted charging rate of 6 tons/hr.?*

**RESPONSE:** The owner requests the ACI be permitted at the 1.4 tons/hr charging rate, the revision has been made to the Manual.

- 3 *Request No. 4 of the Department's letter dated November 6, 2007, states: "Explain how the POWERSCREEN screener and its associated diesel fired engine each qualifies to be an exempt activity per Rule 62-210.300(3), F.A.C. {Note, if the screener and/or engine do not qualify as an exempt activity, a separate after-the-fact air pollution construction application must be submitted to the Air Permitting Section of the Department's Southwest District for the affected non-exempt activity. Any such submitted application will be processed by the Department separately from this renewal application.}"*

*Your response did support the diesel fired engine was not subject to 40 CFR 60, Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. However, your response did not state:*

- A.. If the diesel fired engine would use less than 32,000 gallons/year to comply with the permitting exemption of Rule 62-210.300(3)(a)36.d., F.A.C.*

**RESPONSE:** The maximum fuel use for the unit, based on the permitted hours of operation for the facility, would be around 5,000 gallons per year. This is well below the Rule 62-210.300(3)(a)36.d, FAC exemption threshold of 32,000 gallons per year.

- B. Explain how the potential uncontrolled particulate matter emissions from the screener, belts, etc. are less than the values in the Generic Emissions Unit or Activity Exemption and Temporary Exemptions of Rule 62-210.300(3)(b)], F.A.C.*

**RESPONSE:** The potential uncontrolled particulate matter emissions resulting from the screener, belts, etc. can be estimated based on the emission factor in AP-42, Table 3.3-1, and amount to less than 1 ton per year. Emissions from material handling, while not quantifiable, are negligible since the material is wet. The projected emissions are less than the Rule 62-210.300(3)(b)1, FAC exemption threshold of 5 tons per year.

$$\begin{aligned} \text{PM} &= 0.0022 \text{ lb/hp-hr} \times 109 \text{ hp} \times 2500 \text{ hrs} \times \text{ton}/2000 \text{ lbs} \\ &= 0.3 \text{ tpy} \end{aligned}$$

- C. Therefore, will the diesel fired engine use less than 32,000 gallons of diesel fuel a year? Additionally, submit an explanation of how the POWERSCREEN operates along with the potential particulate matter emissions calculations to support the POWERSCREEN is exempt from permitting or requires an air pollution permit.*

**RESPONSE:** As stated above, the screening unit is exempt from air permitting requirements as it meets the rule exemption criteria.

Regarding the screening operation, the incinerator is shut down periodically and water is used to extinguish any wood still burning. A 330 Grade-All cleans out the pit, as part of good operation practice, and passes it though the screener. The wet material removed from the pit includes unburned wood, ash and soil. This wet material is passes through the screener to separate the wood from the dirt. The wood is then allowed to dry before it is re-introduced into the air curtain incinerator.

4. As requested in No. 2 of the Department's letter dated November 6, 2007: In accordance with Rule 62-297.310(7)(b), F.A.C., re-test the incinerator for visible emissions after all the necessary changes/corrections as mentioned in your additional information above have been completed. The visible emission test shall be in accordance with the testing, notification, and reporting requirements of permit 1190036-002-AO and by January 20, 2008.

**RESPONSE:** The construction of the proposed ACI improvements have been completed and the owner is coordinating with Koogler Associates to schedule the air emissions testing by January 20, 2008.

5. The Department's letter dated November 6, 2007, states in part: "Therefore, your response to the above requests should include both your signature and the professional engineer's signature." Your additional information letter dated November 13, 2007, did not have your signature. Please re-submit the letter dated November 13, 2007, with your signature.

*NOTE - Since your response to No. 3 above would be of a technical nature to demonstrate the screener and its associated diesel engine are exempt, the response must be also certified by a professional engineer registered in the State of Florida. Therefore, your response to the above requests should include both your signature and the professional engineer's signature.*

**RESPONSE:** Mr. Hewitt's signature block has been added to the November 6, 2007 letter, as requested.

**NOTE:** This letter has been signed and sealed by me. I am a P.E.

It is hoped this information is sufficient to allow completion of your review and that the requested renewal Permit can be issued. Please contact our office if there are additional questions or comments regarding the above.

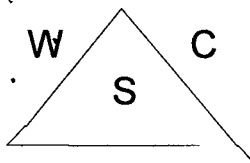
Sincerely,

  
Ted Wicks, P.E.

  
Howard H. Hewitt

Enclosures

xc: Howard Hewitt  
Pradeep Raval, Koogler & Associates



WICKS  
CONSULTING  
SERVICES, INC.

(352) 343-8667 • Fax (352) 343-8665 • admin@wicksconsulting.com  
225 West Main Street • Tavares, Florida 32778-3811  
Environmental, Sanitary & Water Resources Engineering

LETTER OF TRANSMITTAL

**CERTIFIED #7004 0750 0003 4322 0717**

DATE December 27, 2007	JOB NO.
ATTENTION Ms Cindy Zhang-Torres, P.E. District Air Permitting Supervisor	
RE: CR 466A Landfill Facility Permit No. 1190036-002-AO Request for Additional Information DEP File No. 1190036-004-AO	

TO F D E P

13052 North Telecom Parkway

Temple Terrace, Florida 33637-0926

( )  
WE ARE SENDING YOU ☒ Attached ☐ Under separate cover via \_\_\_\_\_ the following items:

- ☐ Shop drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications  
☐ Copy of letter ☐ Change order ☒ Listed ☐ Via Fax ☐ \_\_\_\_\_

COPIES	DESCRIPTION
1 ea	Letter to Ms. Cindy Zhang-Torres, P.E. response to numerical items
1 ea	Letter to Mr. James L. McDonald signed by both Ted Wicks and Howard Hewitt
1 ea	Operations Guidelines Manual
2 ea	Page 1 of Operations Guidelines Manual for replacement

THESE ARE TRANSMITTED as checked below:

- |                                                     |                                                |                                                                              |
|-----------------------------------------------------|------------------------------------------------|------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> For approval    | <input type="checkbox"/> Approved as submitted | <input type="checkbox"/> Resubmit _____ copies for approval                  |
| <input type="checkbox"/> For your information / use | <input type="checkbox"/> Approved as noted     | <input type="checkbox"/> Submit _____ copies for distribution                |
| <input checked="" type="checkbox"/> As requested    | <input type="checkbox"/> Returned              | <input type="checkbox"/> Return _____ corrected prints                       |
| <input type="checkbox"/> For review and comment     | <input type="checkbox"/> For signature         | <input type="checkbox"/> For your file                                       |
| <input type="checkbox"/> FOR BIDS DUE _____         |                                                | <input type="checkbox"/> For Payment                                         |
| <input type="checkbox"/> Fax Transmittal of _____   | pages, including this transmittal sheet.       | Hard Copy to Follow <input type="checkbox"/> Yes <input type="checkbox"/> No |

REMARKS:

COPY TO Howard Hewitt  
Pradeep Raval, Koogler & Associates

SIGNED: Ted Wicks, P.E.  
tedwicks@wicksconsulting.com



W C WICKS  
S CONSULTING  
SERVICES, INC.

OFFICE: (352) 343-8667 • FAX: (352) 343-8665 • E-MAIL: admin@wicksconsulting.com  
225 West Main Street • Tavares, Florida 32778-3811

CERTIFIED MAIL

November 13, 2007

Revised 12/20/2007 to add  
signature block for owner,  
Mr. Howard Hewitt  
Dept. of Environmental  
Protection

DEC 31 2007

Mr. James L. McDonald  
Air Permitting Engineer  
Florida Department of Environmental Protection  
13052 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Southwest District

REF: CR 466-A Landfill Facility, L.L.C. – Sumter County  
Air Curtain Incinerator  
File No. 1190035-002-AO

also received  
11-15-07  
this one for  
Hewitt's  
signature

Dear Mr. McDonald:

Your letter dated November 6, 2007 addressed to Mr. Howard Hewitt has been received and reviewed with him, along with the Air Compliance Section Field Warning Notice dated November 1, 2007, which was given to Clarence Lewis following the on-site inspection conducted by you, Bret Galbraith and Joseph Graham.

In reviewing the content of your letter and the Field Warning Notice, it appears all of the items in the Field Warning Notice are addressed within the comments of your letter. Therefore, we are responding to your letter and copying Bret Galbraith with our response.

The following response corresponds to your numbered items.

1. During my visit to your facility on November 1, 2007, the following issues need to be addressed. Therefore, for each listed issue below, explain how you have resolved the issue and the procedures you are implementing to prevent them from re-occurring.
  - A. Previous applications submitted and your Operations Guidelines Manual state the manifold's nozzles will be at a 20° angle to ensure a proper air curtain. The manifold's nozzles (spouts) were not at a 20° angle from the horizontal or vertical direction. Your response should include updating your Operations Guidelines Manual and clarify if the angle is determined from the horizontal or vertical direction.

**Response:** In a later response to Item I.C, I.D, and I.E, it is proposed to reconstruct the ACI pit. Following reconstruction of the ACI pit, the manifold will be re-positioned and adjusted as necessary to achieve the 20° nozzle angle. The position of the nozzles has been welded to the manifold in a fixed 20° angle position.

- B. Three (3) of the manifold's nozzles were missing, which does not provide reasonable assurance a proper air curtain can be maintained.

**Response:** The three (3) nozzles have been re-attached to the manifold.

- C. *The pit's four (4) walls were not in a vertical position, which does not provide reasonable assurance a proper air curtain can be maintained.*

**Response:** The ACI pit is proposed to be re-constructed to achieve the required measurements as shown on the attached sketch by using steel sheet piling and "H-Beam" anchoring. This configuration will provide a solution to maintaining the required ACI pit dimensions.

- D. *The pit's length (approx. 42 feet) was more than the length of the manifold (approx. 32.5 feet), which does not provide reasonable assurance a proper air curtain can be maintained. See Specific Condition No. 10 of Permit 1190036-002-AO.*

**Response:** Addressed in 1.C. above.

- E. *The pit's width (approx. 22 feet) was more than the allowable width of 12 feet. See Specific Condition No. 10 of Permit 1190036-002-AO.*

**Response:** Addressed in Item 1.C. above.

- F. *Material loaded into the incinerator protruded above the air curtain. See Specific Condition No. 19 of Permit 1190036-002-AO.*

**Response:** At the time of the Air Program Inspection, a large stump was in the ACI pit. In the future, no large stumps will be placed into the pit unless it is determined beforehand that they will not protrude above the air curtain.

- G. *Ash was built up higher than 1/3 the pit depth. See Specific Condition No. 20 of Permit 1190036-002-AO.*

**Response:** The ash has been removed from the ACI pit and will not be allowed to accumulate above the 1/3 pit depth in the future.

- H. *The pit did not have an indicator to show the pit's 1/3 depth. See Specific Condition No. 21 of Permit 1190036-002-AO.*

**Response:** There was a steel pipe inside the pit bottom indicating the 1/3 depth as required. Due to the heat of the ACI pit during the inspections, the pipe could not be observed by the inspectors. Please see the attached ACI pit sketch which shows solid iron rods for the four (4) corners of the pit to be set at 1/3 the depth of the pit.

2. *In accordance with Rule 62-297.310(7)(b), F.A.C., re-test the incinerator for visible emissions after all the necessary changes/corrections as mentioned in No. 1 above have been completed. The visible emission test shall be in accordance with the testing, notification, and reporting requirements of Permit 1190036-002-AO and by January 20, 2008.*

**Response:** The ACI unit will be re-tested for visible emission following the corrective improvements proposed in this letter and reporting requirements of the above referenced Permit.

3. *Page 3 of your Operations Guidelines Manual states the incinerator's charging rate shall not exceed 1.4 tons/hr. (daily average basis), instead of 6 tons/hr. (daily average basis). Please submit a revised page 3 of the manual to incorporate this change.*

**Response:** The Operations Guidelines Manual has been revised to indicate that a charging rate of 1.4 tons per hour (daily average basis) shall not be exceeded for the incinerator.

4. *Explain how the POWERSCREEN screener and its associated diesel fired engine each qualifies to be an exempt activity per Rule 62-210.300(3), F.A.C. (Note, if the screener and/or engine do not qualify as an exempt activity, a separate after-the-fact air pollution construction application must be submitted to the Air Permitting Section of the Department's Southwest District for the affected non-exempt activity. Any such submitted application will be processed by the Department separately from this renewal application.)*

**Response:** Please see the attached Caterpillar Engine Specification Sheet which shows the Screen Machine SN12301000 unit was manufactured prior to 2006. This is the documentation you stated you would need to determine the exempt status of the unit along with the attached F.R. 7/11/06 document.

*NOTE - Since your response to No. 4 above would be of a technical nature to demonstrate the screener and its associated diesel engine are exempt, the response must be also certified by a professional engineer registered in the State of Florida. Therefore, your response to the above requests should include both your signature and the professional engineer's signature.*

A copy of Clive Brown's Certificate of Training is attached as requested. Also, a copy of the ACI Guidelines Manual is now on site.

It is hoped this response addresses all of your concerns and that processing of the renewal application can be completed and the permit issued. Please contact me if you have any questions or need further information.

Sincerely,

  
Ted Wicks, P.E.

Sincerely,

  
Howard H. Hewitt

Enclosures  
xc: Howard Hewitt w/encl.

# **CR 466 - A LANDFILL AIR CURTAIN INCINERATOR**

## ***OPERATIONS GUIDELINES MANUAL***

### **Introduction**

The purpose of this Manual is to provide operations personnel and supervisors with specific and general guidelines for safely operating and maintaining the air curtain incinerator unit, and achieving air quality standards through efficient incineration of approved debris brought to the site.

### **The Air Curtain Incinerator**

The air curtain incinerator unit (ACI) is manufactured by A.B.I., Inc. Manufacturer – Diversified, of Stuart, Florida. The system is to be operated as a trench type unit, with a trench excavated 10' below grade into dense clay soils.

The A.B.I., Inc. literature lists the following features about the ACI:

Portable Air Curtain Incinerator, manufactured by A.B.I., Inc. Manufacturer – Diversified, Stuart, Florida.

Power: 4 cylinder diesel @ 67 h.p.

Fan: 15,500 c.f.m. centrifugal fan

Air Output: 165 m.p.h. @ fan, 110 m.p.h. @ air spouts with 10,400 c.f.m.

Manifold: 1/8" steel solid weld assembly, air spouts inject air at 20 degree angle from the horizontal plane of the manifold to maintain proper combustion air curtain

The attached Site Plan, prepared by Wicks Consulting Services, Inc., shows the initial location of the ACI on the CR 466-A landfill site and a *typical plan and elevation view* of the ACI setup for operation.

### **ACI Attendant**

The air curtain incinerator shall be attended at all times by a trained operator while materials are being burned. During such times as the air curtain incinerator is not in operation, public access to the incinerator shall be restricted.

### **Incoming Waste Handling:**

The landfill attendant will be responsible to separate the in-coming loads of land clearing and yard waste debris at the site office which is located near the front gate. Vehicles will be directed to the area of the ACI for a secondary inspection by a spotter. Accepted

# **CR 466 - A LANDFILL AIR CURTAIN INCINERATOR**

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Key Steele Co.

Department of Environmental  
Protection

DEC 31 2007

Southwest District

# **CR 466-A LANDFILL AIR CURTAIN INCINERATOR**

**8979 CR 466-A  
Wildwood, Florida 34785  
Sumter County, Florida  
FDEP Permit No. 1190036-001-AO**

## **OPERATIONS GUIDELINES MANUAL**

Prepared For:

**CR 466-A Landfill, L.L.C.  
c/o Mr. Howard Hewitt  
P. O. Box 490697  
Leesburg, Florida 34749-0697**

Prepared By:

**Wicks Consulting Services, Inc.  
225 West Main Street  
Tavares, Florida 32778  
(352) 343-8667**

**Revised December 20, 2007  
October 10, 2007**

*Handwritten signature*  
KENNETH RAND  
12/27/07  
NO. 38274  
STATE OF  
FLORIDA  
PROFESSIONAL ENGINEER

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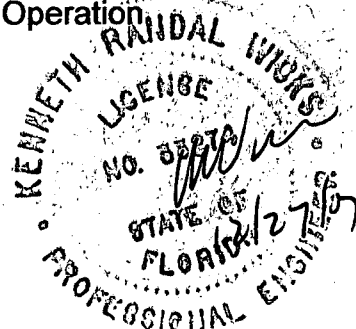
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## ATTACHMENTS

Florida Administrative Code Chapter 62-297  
 Stationary Sources -- Emission Monitoring

Copy of Florida Department of Environmental Protection Air Emission Operation  
 Permit No. 1190036-002-AO

Site Plan



# **CR 466 - A LANDFILL AIR CURTAIN INCINERATOR OPERATIONS GUIDELINES MANUAL**

## **Introduction**

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The landfill attendant will be responsible to separate the in-coming loads of land clearing and yard waste debris at the site office which is located near the front gate. Vehicles will be directed to the area of the ACI for a secondary inspection by a spotter. Accepted



loads will be dumped in a designated area in the proximity of the ACI. The ACI trench will be charged with debris from the staging area by a front-end loader.

### **ACI Operation**

The ACI will be utilized for incineration of land clearing debris, yard waste (leaves, grass clippings & hedge trimmings all removed from plastic bags or similar containers prior to incineration) and clean wood.

The material shall not be loaded into the air curtain incinerator such that it will protrude above the air curtain. Ash shall not be allowed to build up in the pit of an air curtain incinerator to higher than 1/3 the pit depth or to the point where the ash begins to impede combustion, whichever occurs first. The pit shall be marked with an indicator to show the 1/3 depth.

The only materials that shall be burned in an air curtain incinerator are wood waste, yard waste, and clean lumber. The burning of sawdust, paper, paper trash, tires, garbage, rubber material, plastics, liquid wastes, Bunker C residual oil, roofing materials, tar, asphalt, railroad cross ties or other creosoted lumber, chemically treated or painted wood, and other similar materials in any air curtain incinerator is expressly prohibited.

Only virgin oil, natural gas, or liquefied petroleum gas may be used to start the fire in an air curtain incinerator. The use of waste oil, chemicals, gasoline, or tires is expressly prohibited.

The burn trench will be ignited with 5 gallons of No. 2 diesel fuel on days that the unit is in operation. When the debris has achieved combustion, the air curtain incinerator unit will be brought to full operational output and incineration of debris will continue by charging the trench with a front-end bucket loader.

The trench will be allowed to cool at the end of each day's operation. The front-end loader will be utilized to remove the ash residue from the trench as-needed to maintain effective air movement within the burn trench.

The area adjacent to the ACI must be kept orderly and debris to be incinerated stored in small piles to prevent accidental ignition. Sparks from the ACI can also be a source of ignition, not only to the staging area debris, but also to the other landfill operations. Therefore, observation of other site areas is essential to prevent fires.

### **The Landfill Facility**

The CR 466-A landfill is permitted by the Florida Department of Environmental Protection under Permit No. 172478-001-SO, to construct, operate and close a construction and demolition debris disposal and recycling facility on approximately 65 acres of an 80 acre site in 6 phases (Phases "A", "B", "C", "D", "E", and "F"). The ACI unit is currently located on the C & D facility site, in the southeast corner.

## **Maintenance & Inspection**

Daily inspections of ACI equipment, roadway, trench structure and debris storage staging areas are to be performed by operations and supervisory personnel. The level of ash residue in the burn trench should be checked each morning prior to loading (charging) the trench. The trench sidewalls are excavated vertically above the floor to a height of ten feet (10'). The earthen burning pit is 35 feet long by 12 feet wide by 10 feet deep. When the ash residue reaches 1/3 of the volume of the trench it will be required to clean the trench floor of ash residue. The pit is marked with an indicator to show the 1/3 depth. The ash will be utilized as a soil fertilizer on the landfill site. It will be stockpiled temporarily to cool, then applied over the setback areas and closed portions of the C & D Landfill.

The following dimensions for the pit must be strictly adhered to: no more than 12 feet wide, between 8 and 15 feet deep, and not longer than the length of the manifold. Pit width, length and side walls shall be properly maintained so that combustion of the waste within the pit will be maintained at an adequate temperature and with sufficient air re-circulation to provide enough residence time for mixing for complete combustion and control of emissions. The pit shall not be dug within a previously active portion of a landfill.

The results of daily inspections and any maintenance performed should be kept in an inspection log (see the *Reporting & Record Keeping* section) with date recorded and items noted which need attention and appropriate follow-up corrective/investigative action indicated, along with the name of the individual performing the inspection or maintenance.

### **Charging Rate**

The current FDEP Permit was issued as a Construction Permit and Operation Permit. The Construction Permit authorized the ACI to be charged at 1.4 tons/hour and increased to 6 tons/hour for the Operation Permit after demonstrating that the performance was per the original design. The owner now requests the ACI be permitted at 1.4 tons/hour.

The maximum charging rate to the incinerator shall not exceed 1.4 tons/hr. (daily average basis) and 3,500 tons per day per any consecutive 12 month period. The charging rate going into the pit shall be determined by the following procedure: The loader used to charge the pit shall weight five (5) buckets (rakes) at a representative maximum capacity and representative material to be charged into the burn pit. This average, along with the number of charges, shall then be used to determine the hourly process rate. In addition, the loader bucket (rake) that will be used to charge the pit shall be designated as the only one used in charging the pit. If a different or alternate sized loader is used, a new average shall be determined and noted in the facility's records/logs.

## **Hours of Operation**

The ACI shall not be started before sunrise and all charging must have ceased before sunset.

## **Safety & Emergency Preparedness**

The job of the ACI site personnel is one of long periods of routine, sometimes boring work, interrupted occasionally by intense stressful situations that require snap decisions and quick action. The most important thing that can be done is to remain calm. A well developed and understood emergency response plan is the best protection for employees and the environment. The following emergencies are briefly described along with the recommended plan of action to be followed to deal with each situation.

**Fire:** A fire caused by a spark or hot ashes in the debris piles can be smothered by soil material moved over the "hot spot" by the site equipment operator with the dedicated site loader or tracked dozer. The operator must not get the machine over or into the fire. Use soil material to push ahead of the equipment to cover and smother the fire. If the fire is too aggressive for the operator to control, CALL 911 as soon as possible.

The site operator must insure all on-site persons and vehicles are moved upwind of the immediate area and wait in the vicinity of the site gate to assist arriving emergency crews. The site operator should remain on the telephone with the 911 Emergency operator if possible.

**Injury** The Training Plan outlines the level of proficiency to have site operation personnel trained in first aid and adequate first aid supplies are to be maintained at the site.

Should an injury occur, immediately administer necessary first aid to the injured person. If the injury is minor, note the name of the injured person in the Daily Log and notify the C & D facility owner as soon as possible. Should the injury be serious or life threatening, CALL 911 IMMEDIATELY and administer necessary first aid to the injured person. Remain on the telephone with the Emergency Operator if possible until emergency response crews arrive.

**Hazardous Waste Material** Should hazardous waste (HW) materials be found in C & D debris, site operations personnel should not attempt to remove chemicals or hazardous substances. The site operator should immediately clear the area of all personnel, relocating to a secure area upwind of the location of the hazardous substance. The site operator should then CALL 911 and report the situation, attempting to stay on the telephone with the Emergency Operator until emergency response crews arrive. Every effort should be made to determine the source of the HW, as illegally disposing of HW is a criminal offense.

All occurrences of an emergency nature are to be reported to the facility owner as soon as possible and a full written report entered into the Daily Log.

### **Emergency Contact Phone Numbers:**

Mr. Howard Hewitt Owner/Operator	(352) 787-5651
Sumter County Fire, Medical Emergency & Rescue	911
Sumter County Sheriff's Office - Emergency Non-Emergency	911 (352) 728-6909
Hazardous Materials: Emergency Response Center	(800) 564-7577
Hazardous Waste Information	(404) 562-8579
Toxic Chemical & Oil Spills:	(800) 424-8802
Florida Highway Patrol Fruitland Park – Non Emergency	(352) 360-6511
Florida Department of Environmental Protection: Tampa District Office	(813) 632-7600

### **Air Quality Concerns**

The ACI is subject to regulation as an air emissions unit and must comply with visible emissions limitation standards. Semi-annual compliance testing is required and must be conducted at the owner/operator's expense. The FDEP Permit *Specific Conditions* describe the testing required. The procedure to conduct the required compliance testing is also addressed in FAC 62-297.310 General Compliance Test Requirements and FAC 62-297.401 Compliance Test Methods. A copy of Florida Administrative Code (FAC) Chapter 62-297 and the FDEP Operation Permit are attached in the Appendix of this Manual. The owner/operator of the ACI should become familiar with this regulation and the FDEP Operating Permit for the ACI unit.

#### **Air Particulate Matter Control**

All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include the following:

- Ash removed from the pit shall be wetted with water, prior to removal, and as necessary
- Ash removed from the pit shall be wetted with water, as necessary, to ensure the ash does not become airborne or begin to smolder
- Water shall be applied as necessary to the facility grounds
- Reasonable care shall be taken in loading and unloading the pit

### **Regulatory Agencies**

The Florida Department of Environmental Protection, Southwest District, Tampa office, telephone number (813) 632-7600, Air Permitting Section, is the state regulatory agency with permitting and compliance responsibility regarding ACI unit operation.

Sumter County Board of County Commissioners (telephone number 352-793-0270) has issued a land Use Permit for the C & D Landfill and has allowed the landfill facility to operate under certain conditions of this permit. Copies of these permits are on file at the CR 466-A Landfill office located near the site front gate.

### **Training Plan**

Employees and supervisors operating the ACI unit shall be trained to a level of proficiency necessary to operate and maintain the site in a safe and practical manner. They shall be instructed in the principals of first aid and safety and in the specific operational procedures necessary to prevent accidents, including limitation of access by unauthorized persons. Additionally, operations personnel and spotters are required to identify and properly manage any hazardous or prohibited materials which may be received at the facility.

Each trained operator shall receive a certificate demonstrating that the operator has successfully passed the required training. During the tenure of the operator, a copy of his certificate shall be kept on file at the facility.

The site supervisor shall periodically review the contents of this Manual with employees.

### **Reporting & Record Keeping**

A copy of all operating records, reports, engineering drawings, training certificates, permits and approved operations plan will be kept on file in the landfill operations office located at the front gate. These documents will be available for review during normal operating hours and will be a part of the Facility's permanent records.

A copy of the Daily Operation record keeping forms are attached which will assist in accounting and the site operation recording activities. A Daily Log form is attached and shall be maintained to record operation information, including the quantity of debris

received. The total site operation shall be carried on to insure a systematic businesslike manner, and records are to be kept in a chronological format.

CR466A AirCurtainOpsulde Oct 2007

## OPERATION RECORD

[illegible]

## DAILY LOG

[illegible]





# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

December 3, 2007

Mr. Howard H. Hewitt, Managing Member  
C.R. 466A Landfill Facility, L.L.C.  
P.O. Box 490697  
Leesburg, FL 34749-0697

Dear Mr. Hewitt:

Re: Additional Information Letter dated November 13, 2007  
Reference Permit No. 1190036-002-AO  
DEP File No. 1190036-004-AO

On November 15, 2007, the Department received additional information from your consultant, Ted Wicks, regarding your air pollution permit application to renew the operating permit for your air curtain incinerator located in Sumter County. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Request No. 1.A. of the Department's letter dated November 6, 2007, states: "Previous applications submitted and your Operations Guidelines Manual state the manifold's nozzles will be at a 20° angle to ensure a proper air curtain. The manifold's nozzles (spouts) were not at a 20° angle from the horizontal or vertical direction. Your response should include updating your Operations Guidelines Manual and clarify if the angle is determined from the horizontal or vertical direction."

Your additional information did not include an updated page from your Operations Guidelines Manual or explain your Operations Guidelines Manual was updated to say the 20° angle is determined from either the vertical or horizontal. Please provide the updated page or explanation.

2. Request No. 3 of the Department's letter dated November 6, 2007, states: "Page 3 of your Operations Guidelines Manual states the incinerator's charging rate shall not exceed 1.4 tons/hr. (daily average basis), instead of 6 tons/hr. (daily average basis). Please submit a revised page 3 of the manual to incorporate this change."

Your response still states the charging rate shall not exceed 1.4 tons/hr. (daily average basis). Was the value 1.4 just a typographical error or are you requesting your permit be revised back to 1.4 tons/hr. verses the current permitted charging rate of 6 tons/hr.?

- 3 Request No. 4 of the Department's letter dated November 6, 2007, states: "Explain how the POWERSCREEN screener and its associated diesel fired engine each qualifies to be an exempt activity per Rule 62-210.300(3), F.A.C. {Note, if the screener and/or engine do not qualify as an exempt activity, a separate after-the-fact air pollution construction application must be submitted to the Air Permitting Section of the Department's Southwest District for the affected non-exempt activity. Any such submitted application will be processed by the Department separately from this renewal application.}"

Your response did support the diesel fired engine was not subject to 40 CFR 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. However, your response did not state:

- A. If the diesel fired engine would use less than 32,000 gallons/year to comply with the permitting exemption of Rule 62-210.300(3)(a)36.d., F.A.C.
- B. Explain how the potential uncontrolled particulate matter emissions from the screener, belts, etc. are less than the values in the Generic Emissions Unit or Activity Exemption and Temporary Exemptions of Rule 62-210.300(3)(b)1., F.A.C.

Therefore, will the diesel fired engine use less than 32,000 gallons of diesel fuel a year? Additionally, submit an explanation of how the POWERSCREEN operates along with the potential particulate matter emissions calculations to support the POWERSCREEN is exempt from permitting or requires an air pollution permit.

4. As requested in No. 2 of the Department's letter dated November 6, 2007: In accordance with Rule 62-297.310(7)(b), F.A.C., re-test the incinerator for visible emissions after all the necessary changes/corrections as mentioned in your additional information above have been completed. The visible emission test shall be in accordance with the testing, notification, and reporting requirements of permit 1190036-002-AO and by January 20, 2008.
5. The Department's letter dated November 6, 2007, states in part: "Therefore, your response to the above requests should include **both** your signature and the professional engineer's signature." Your additional information letter dated November 13, 2007, did not have your signature. Please re-submit the letter dated November 13, 2007, with your signature.

NOTE – Since your response to No. 3 above would be of a technical nature to demonstrate the screener and its associated diesel engine are exempt, the response must be also certified by a professional engineer registered in the State of Florida. Therefore, your response to the above requests should include **both** your signature and the professional engineer's signature.

Your response to all of the items above should be submitted to the Air Permitting Section of the Department's Southwest District Office in conjunction with the visible emissions test report required by No. 4 above and no later than March 5, 2008. Note, the visible emission test report is required to be submitted within 45 days of testing per Rule 62-297.310(8)(b), F.A.C.

C.R. 466A Landfill Facility, L.L.C.  
DEP File No. 1190036-004-AO

Page 3 of 3

If you have any questions, please call Jim McDonald at 813-632-7600 extension 106.

Sincerely,

A handwritten signature in cursive script that reads "Cindy Zhang-Torres".

Cindy Zhang-Torres, P.E.  
District Air Permitting Supervisor

cc: Mr. Ted Wicks, P.E.  
Wicks Consulting Services, Inc.  
225 West Main Street  
Tavares, FL 32778-3811

**McDonald, Jim**

---

**From:** McDonald, Jim  
**Sent:** Friday, November 30, 2007 11:16 AM  
**To:** 'ROLAND LEWIS'  
**Cc:** 'Ted Wicks'; pcages@hewittcontracting.com; Zhang-Torres  
**Subject:** RE: CR 466-A Landfill Air Curtain Incinerator - Sumter County

Roland, I have reviewed the response. The Department does not object to the repairing/rebuilding of the pit provided the pit's dimensions meet Rule 62-296.401(7)(b)2., F.A.C. This rule states, "If the air curtain incinerator employs an earthen trench, the pit walls (width and length) shall be vertical, and maintained as such, so that combustion of the waste within the pit is maintained at an adequate temperature and with sufficient air recirculation to provide enough residence time and mixing for proper combustion and control of emission. The following dimensions for the pit must be strictly adhered to: no more than twelve feet (12') wide, between eight feet (8') and fifteen (15') feet deep, and no longer than the length of the manifold. The pit shall not be dug within a previously active portion of a landfill."

Note, your current permit states the manifold is 35 feet long and the submitted diagram states the length of the pit is 35 feet long. However during my visit to the site I measured the length of the manifold at approximately at 32.5 feet. My measurement was just an approximate measurement, since I could not get close to the manifold because the area was too hot. So be sure the pit is no longer than the length of the manifold.

Thanks for your cooperation.

---

**From:** ROLAND LEWIS [mailto:RLEWIS@WICKSCONSULTING.COM]  
**Sent:** Thursday, November 29, 2007 8:38 AM  
**To:** McDonald, Jim  
**Cc:** 'Ted Wicks'; pcages@hewittcontracting.com  
**Subject:** CR 466-A Landfill Air Curtain Incinerator - Sumter County

REF: CR 466-A Landfill Air Curtain Incinerator, FDEP File No. 1190036-004-AO

Good Morning Jim:

The CR 466-A Landfill Manager, Clarence Lewis, who you met on site November 1, 2007, asked me to contact you regarding Ted's response letter to your November 6, 2007 letter. Have you had a chance to review the dimensions and configurations for rebuilding the ACI pit submitted with the response letter? We would appreciate a response from you because Clarence has to order the materials to construct the pit sidewalls and your letter said the emissions re-testing had to be completed by January 20, 2008. To order and receive the materials, do the construction improvements to the pit, and schedule Koogler & Assoc, for the re-test will require time for planning and coordination. Also, FDEP Air Compliance Section is to be notified 15 days prior to the re-test, so this is also a time factor.

If the drawings and response items in Ted's letter meet with the Department's approval we will appreciate a response so Clarence can begin the work and schedule the re-testing.

Thank you for your attention to this request,

*Roland Lewis*

11/30/2007

Wicks Consulting Services, Inc.  
225 West Main Street  
Tavares, FL 32778  
ph: 352-343-8667  
fax: 352-343-8665  
email: [rlewis@wicksconsulting.com](mailto:rlewis@wicksconsulting.com)

**McDonald, Jim**

---

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Thank you for your attention to this request,

*Roland Lewis*  
Wicks Consulting Services, Inc.  
225 West Main Street  
Tavares, FL 32778  
ph: 352-343-8667  
fax: 352-343-8665  
email: rlewis@wicksconsulting.com

11/30/2007



OFFICE: (352) 343-8667 • FAX: (352) 343-8665 • E-MAIL: admin@wicksconsulting.com  
225 West Main Street • Tavares, Florida 32778-3811

**CERTIFIED MAIL**

November 13, 2007

Dept. of Environmental  
Protection

Mr. James L. McDonald  
Air Permitting Engineer  
Florida Department of Environmental Protection  
13052 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

NOV 15 2007

REF: CR 466-A Landfill Facility, L.L.C. – Sumter County  
Air Curtain Incinerator  
File No. 1190035-002-AO

Southwest District

Dear Mr. McDonald:

Your letter dated November 6, 2007 addressed to Mr. Howard Hewitt has been received and reviewed with him, along with the Air Compliance Section Field Warning Notice dated November 1, 2007, which was given to Clarence Lewis following the on-site inspection conducted by you, Bret Galbraith and Joseph Graham.

In reviewing the content of your letter and the Field Warning Notice, it appears all of the items in the Field Warning Notice are addressed within the comments of your letter. Therefore, we are responding to your letter and copying Bret Galbraith with our response.

The following response corresponds to your numbered items.

1. *During my visit to your facility on November 1, 2007, the following issues need to be addressed. Therefore, for each listed issue below, explain how you have resolved the issue and the procedures you are implementing to prevent them from re-occurring.*

A. *Previous applications submitted and your Operations Guidelines Manual state the manifold's nozzles will be at a 20° angle to ensure a proper air curtain. The manifold's nozzles (spouts) were not at a 20° angle from the horizontal or vertical direction. Your response should include updating your Operations Guidelines Manual and clarify if the angle is determined from the horizontal or vertical direction.*

**Response:** In a later response to Item I.C, I.D, and I.E, it is proposed to reconstruct the ACI pit. Following reconstruction of the ACI pit, the manifold will be re-positioned and adjusted as necessary to achieve the 20° nozzle angle. The position of the nozzles has been welded to the manifold in a fixed 20° angle position.

B. *Three (3) of the manifold's nozzles were missing, which does not provide reasonable assurance a proper air curtain can be maintained.*

**Response:** The three (3) nozzles have been re-attached to the manifold.

- C. *The pit's four (4) walls were not in a vertical position, which does not provide reasonable assurance a proper air curtain can be maintained.*

**Response:** The ACI pit is proposed to be re-constructed to achieve the required measurements as shown on the attached sketch by using steel sheet piling and "H-Beam" anchoring. This configuration will provide a solution to maintaining the required ACI pit dimensions.

- D. *The pit's length (approx. 42 feet) was more than the length of the manifold (approx. 32.5 feet), which does not provide reasonable assurance a proper air curtain can be maintained. See Specific Condition No. 10 of Permit 1190036-002-AO.*

**Response:** Addressed in 1.C. above.

- E. *The pit's width (approx. 22 feet) was more than the allowable width of 12 feet. See Specific Condition No. 10 of Permit 1190036-002-AO.*

**Response:** Addressed in Item 1.C. above.

- F. *Material loaded into the incinerator protruded above the air curtain. See Specific Condition No. 19 of Permit 1190036-002-AO.*

**Response:** At the time of the Air Program Inspection, a large stump was in the ACI pit. In the future, no large stumps will be placed into the pit unless it is determined beforehand that they will not protrude above the air curtain.

- G. *Ash was built up higher than 1/3 the pit depth. See Specific Condition No. 20 of Permit 1190036-002-AO.*

**Response:** The ash has been removed from the ACI pit and will not be allowed to accumulate above the 1/3 pit depth in the future.

- H. *The pit did not have an indicator to show the pit's 1/3 depth. See Specific Condition No. 21 of Permit 1190036-002-AO.*

**Response:** There was a steel pipe inside the pit bottom indicating the 1/3 depth as required. Due to the heat of the ACI pit during the inspections, the pipe could not be observed by the inspectors. Please see the attached ACI pit sketch which shows solid iron rods for the four (4) corners of the pit to be set at 1/3 the depth of the pit.

2. *In accordance with Rule 62-297.310(7)(b), F.A.C., re-test the incinerator for visible emissions after all the necessary changes/corrections as mentioned in No. 1 above have been completed. The visible emission test shall be in accordance with the testing, notification, and reporting requirements of Permit 1190036-002-AO and by January 20, 2008.*

**Response:** The ACI unit will be re-tested for visible emission following the corrective improvements proposed in this letter and reporting requirements of the above referenced Permit.

3. *Page 3 of your Operations Guidelines Manual states the incinerator's charging rate shall not exceed 1.4 tons/hr. (daily average basis), instead of 6 tons/hr. (daily average basis). Please submit a revised page 3 of the manual to incorporate this change.*

**Response:** The Operations Guidelines Manual has been revised to indicate that a charging rate of 1.4 tons per hour (daily average basis) shall not be exceeded for the incinerator.

4. *Explain how the POWERSCREEN screener and its associated diesel fired engine each qualifies to be an exempt activity per Rule 62-210.300(3), F.A.C. (Note, if the screener and/or engine do not qualify as an exempt activity, a separate after-the-fact air pollution construction application must be submitted to the Air Permitting Section of the Department's Southwest District for the affected non-exempt activity. Any such submitted application will be processed by the Department separately from this renewal application.)*



11/13/2007

**Response:** Please see the attached Caterpillar Engine Specification Sheet which shows the Screen Machine SN12301000 unit was manufactured prior to 2006. This is the documentation you stated you would need to determine the exempt status of the unit along with the attached F.R. 7/11/06 document.

*NOTE - Since your response to No. 4 above would be of a technical nature to demonstrate the screener and its associated diesel engine are exempt, the response must be also certified by a professional engineer registered in the State of Florida. Therefore, your response to the above requests should include both your signature and the professional engineer's signature.*

A copy of Clive Brown's Certificate of Training is attached as requested. Also, a copy of the ACI Guidelines Manual is now on site.

It is hoped this response addresses all of your concerns and that processing of the renewal application can be completed and the permit issued. Please contact me if you have any questions or need further information.

Sincerely,



Ted Wicks, P.E.

TW:kh

Enclosures

xc: Howard Hewitt w/encl.

Dept. of Environmental  
Protection

NOV 15 2007

CR466A ACI McDonald 11-8-07 Insp Resp

Southwest District

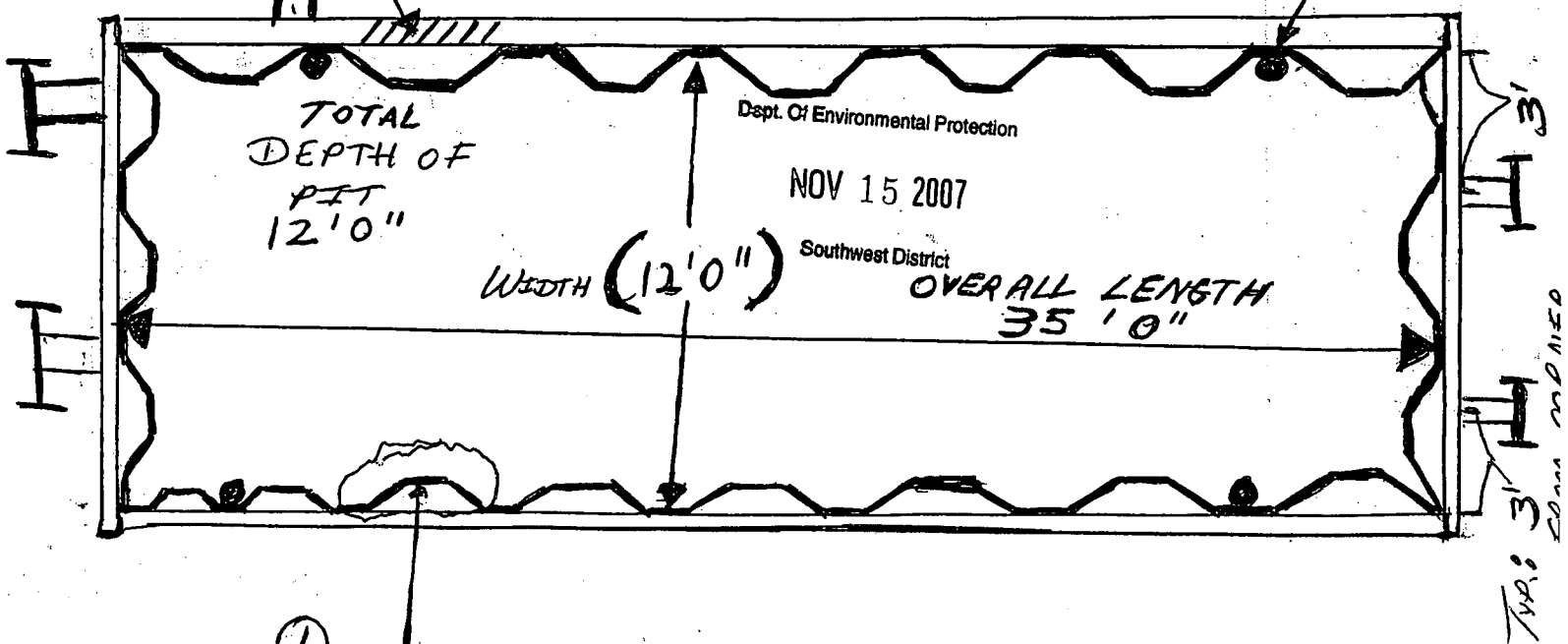
# SHEET PILING TOTAL LENGTH - 19'

④ Steel Rod Welded From Beam that is ATTACHED TO SHEET PILING to H-Beam USED AS ANCHOR SUPPORT.

③ H-Beam DROVE IN GROUND AS ANCHOR To Support Welded Beam to Hold Walls Vert.

② Steel H-Beam Welded To The BACK OF ALL Sheet Piling "TYPICAL" AROUND ENTIRE BURN PIT (3' FROM TOP OF SHEET PILING)

TYPICAL → IRON SOLID ROD  
ALL 4 CORNERS FOR ASH DEPTH



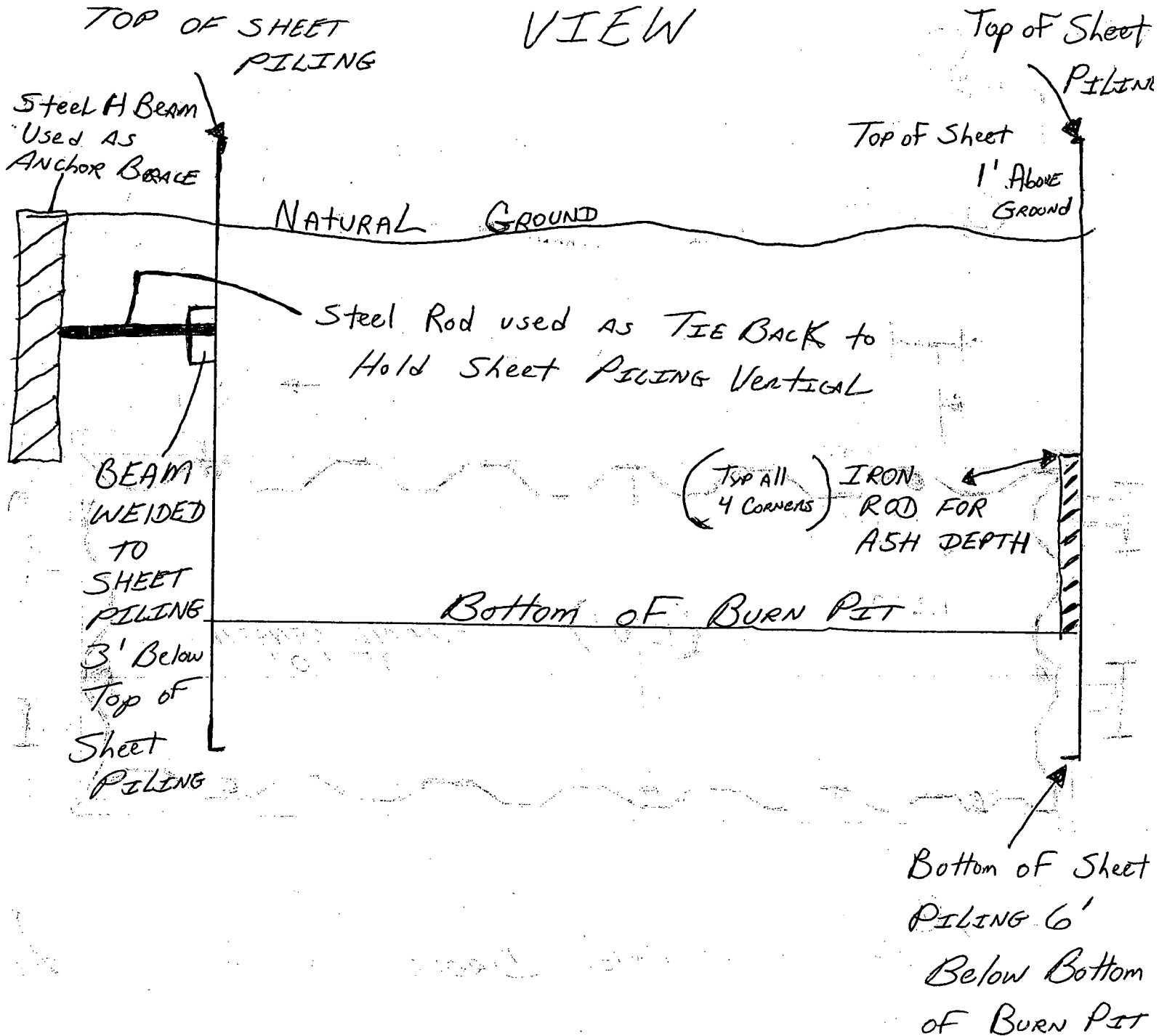
TYP: ① Steel Sheet PILING DROVE IN GROUND WITH Bottom of PILING 6' Below Bottom of BURN PIT.

Dept. of Environmental  
Protection

NOV 15 2007

Southwest District

SIDE  
VIEW



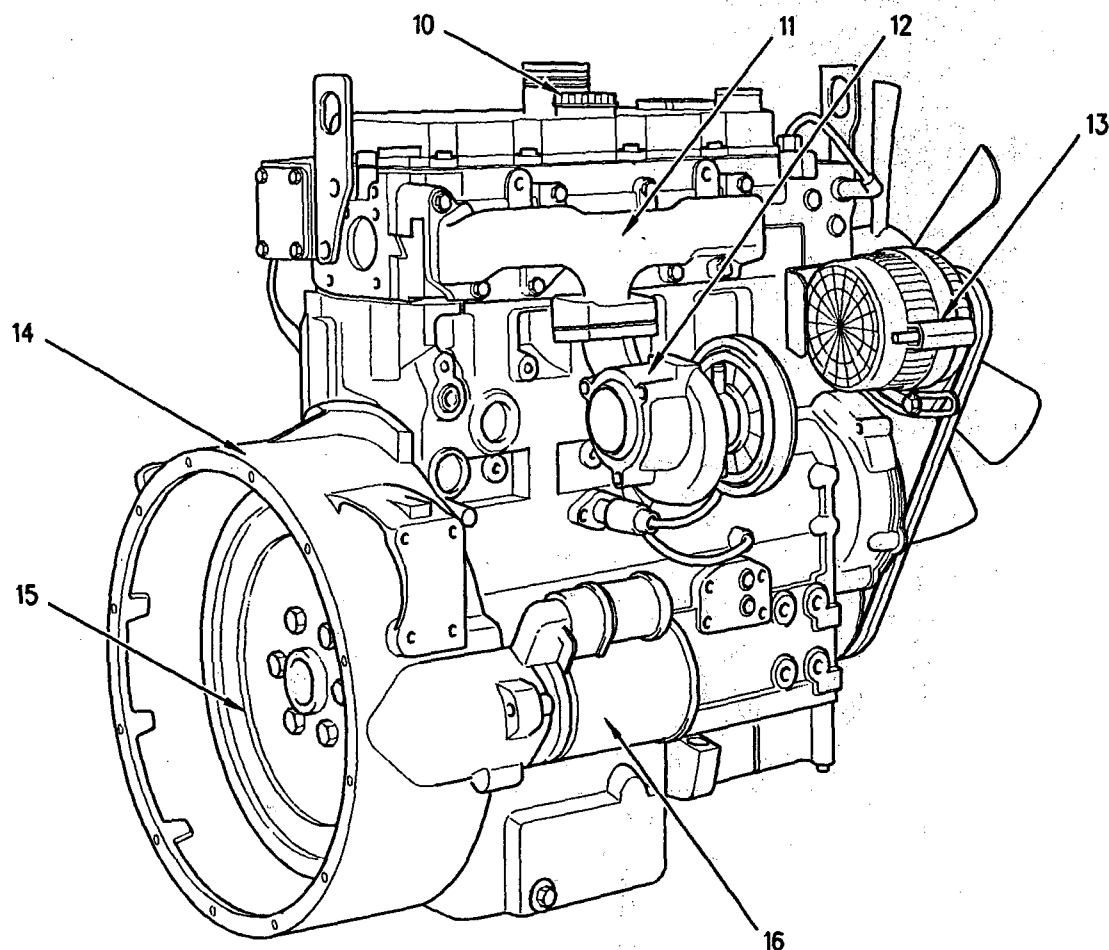


Illustration 13

g00929200

(10) Engine oil filler cap  
(11) Exhaust manifold  
(12) Turbocharger

(13) Alternator  
(14) Flywheel housing  
(15) Flywheel

(16) Starter motor

i01819964

## Engine Description

**SMCS Code:** 1000

The 3054C Industrial Engines are designed for the following applications: machine and industrial mobile equipment. The engines are available in the following types of aspiration:

- Turbocharged aftercooled
- Turbocharged
- Naturally aspirated

## Engine Specifications

**Note:** The front end of the engine is opposite the flywheel end of the engine. The left and the right sides of the engine are determined from the flywheel end. The number 1 cylinder is the front cylinder.

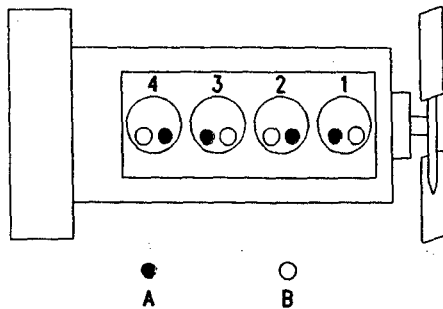


Illustration 14

g00577193

3054C

- (A) Exhaust valves  
(B) Inlet valves

Table 1

3054C Industrial Engine Specifications	
Operating Range (rpm)	1500 to 2800 <sup>(1)</sup>
Number of Cylinders	4 In-Line
Bore	105 mm (4.134 inch)
Stroke	127 mm (5.0 inch)
Aspiration	Turbocharged aftercooled Turbocharged Naturally aspirated
Compression Ratio	NA 19.3:1 NA T 18.2:1 T, TA
Displacement	4.4 L (268 in <sup>3</sup> )
Firing Order	1 3 4 2
Rotation (flywheel end)	Counterclockwise
Valve Lash Setting (Inlet)	0.20 mm (0.008 inch)
Valve Lash Setting (Exhaust)	0.45 mm (0.018 inch)

<sup>(1)</sup> The operating rpm is dependent on the engine rating and the application.

## Engine Cooling and Lubrication

The cooling system consists of the following components:

- Gear-driven centrifugal water pump
- Water temperature regulators which regulate the engine coolant temperature
- Gear-driven oil pump (gear type)
- Oil cooler

The engine lubricating oil is supplied by a gear type pump. The engine lubricating oil is cooled and the engine lubricating oil is filtered. Bypass valves provide unrestricted flow of lubrication oil to the engine parts when oil viscosity is high. Bypass valves can also provide unrestricted flow of lubrication oil to the engine parts if the oil cooler should become plugged or if the oil filter element should become plugged.

Engine efficiency, efficiency of emission controls, and engine performance depend on adherence to proper operation and maintenance recommendations. Engine performance and efficiency also depend on the use of recommended fuels, lubrication oils, and coolants. Refer to the Operation and Maintenance Manual, "Maintenance Interval Schedule" for more information on maintenance items.

## Engine Service Life

Engine efficiency and maximum utilization of engine performance depend on the adherence to proper operation and maintenance recommendations. In addition, use recommended fuels, coolants and lubricants. Use the Operation and Maintenance Manual as a guide for required engine maintenance.

Expected engine life is generally predicted by the average power that is demanded. The average power that is demanded is based on fuel consumption of the engine over a period of time. Reduced hours of operation at full throttle and/or operating at reduced throttle settings result in a lower average power demand. Reduced hours of operation will increase the length of operating time before an engine overhaul is required. For more information, refer to the Operation and Maintenance Manual, "Overhaul Considerations" topic (Maintenance Section).

## Aftermarket Products and Caterpillar Engines

When auxiliary devices, accessories, or consumables (filters, additives, catalysts, etc) which are made by other manufacturers are used on Caterpillar products, the Caterpillar warranty is not affected simply because of such use.

**However, failures that result from the installation or use of other manufacturers' devices, accessories, or consumables are NOT Caterpillar defects. Therefore, the defects are NOT covered under the Caterpillar warranty.**

**Updated 7/19/06- EFFECTIVE 9/11/06**

**Source Federal Register Dated 7/11/06**

**Subpart III--Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

**What This Subpart Covers**

**60.4200** Am I subject to this subpart?

**Emission Standards for Manufacturers**

**60.4201** What emission standards must I meet for non-emergency engines if I am a stationary CI internal combustion engine manufacturer?

**60.4202** What emission standards must I meet for emergency engines if I am a stationary CI internal combustion engine manufacturer?

**60.4203** How long must my engines meet the emission standards if I am a stationary CI internal combustion engine manufacturer?

**Emission Standards for Owners and Operators**

**60.4204** What emission standards must I meet for non-emergency engines if I am an owner or operator of a stationary CI internal combustion engine?

**60.4205** What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?

**60.4206** How long must I meet the emission standards if I am an owner or operator of a stationary CI internal combustion engine?

**Fuel Requirements for Owners and Operators**

**60.4207** What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to this subpart?

**Other Requirements for Owners and Operators**

**60.4208** What is the deadline for importing and installing stationary CI ICE produced in the previous model year?

**60.4209** What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?

**Compliance Requirements**

**60.4210** What are my compliance requirements if I am a stationary CI internal combustion engine manufacturer?

**60.4211** What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?

**Testing Requirements for Owners and Operators**

**60.4212** What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of less than 30 liters per cylinder?

**60.4213** What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of greater than or equal to 30 liters per cylinder?

## **Notification, Reports, and Records for Owners and Operators**

**60.4214** What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?

## **Special Requirements**

**60.4215** What requirements must I meet for engines used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands?

**60.4216** What requirements must I meet for engines used in Alaska?

**60.4217** What emission standards must I meet if I am an owner or operator of a stationary internal combustion engine using special fuels?

## **General Provisions**

**60.4218** What parts of the General Provisions apply to me?

## **Definitions**

**60.4219** What definitions apply to this subpart?

## **Tables to Subpart III of Part 60**

**Table 1** to Subpart III of Part 60--Emission Standards for Stationary Pre-2007 Model Year Engines with a displacement of < 10 liters per cylinder and 2007-2010 Model Year Engines >2,237 KW (3,000 HP) and with a displacement of < 10 liters per cylinder

**Table 2** to Subpart III of Part 60--Emission Standards for 2008 Model Year and Later Emergency Stationary CI ICE < 37 KW (50 HP) and with a Displacement of < 10 liters per cylinder

**Table 3** to Subpart III of Part 60--Certification Requirements for Stationary Fire Pump Engines

**Table 4** to Subpart III of Part 60--Emission Standards for Stationary Fire Pump Engines

**Table 5** to Subpart III of Part 60--Labeling and Recordkeeping Requirements for New Stationary Emergency Engines

**Table 6** to Subpart III of Part 60--Optional 3-Mode Test Cycle for Stationary Fire Pump Engines

**Table 7** to Subpart III of Part 60--Requirements for Performance Tests for Stationary CI ICE with a displacement of  $\geq 30$  liters per cylinder

**Table 8** to Subpart III of Part 60--Applicability of General Provisions to Subpart III

## **Sec. 60.4200 Am I subject to this subpart?**

(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

(1) Manufacturers of stationary CI ICE with a displacement of less than 30 liters per cylinder where the model year is:

(i) 2007 or later, for engines that are not fire pump engines,

(ii) The model year listed in table 3 to this subpart or later model year, for fire pump engines.

(2) Owners and operators of stationary CI ICE that commence construction after July 11, 2005 where the stationary CI ICE are:

(i) Manufactured after April 1, 2006 and are not fire pump engines, or

(ii) Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

(3) Owners and operators of stationary CI ICE that modify or reconstruct their stationary CI ICE after July 11, 2005.

(b) The provisions of this subpart are not applicable to stationary CI ICE being tested at a stationary CI ICE test cell/stand.

(c) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

(d) Stationary CI ICE may be eligible for exemption from the requirements of this subpart as described in 40 CFR part 1068, subpart C (or the exemptions described in 40 CFR part 89, subpart J and 40 CFR part 94, subpart J, for engines that would need to be certified to standards in those parts), except that owners and operators, as well as manufacturers, may be eligible to request an exemption for national security.

**Sec. 60.4201 What emission standards must I meet for non-emergency engines if I am a stationary CI internal combustion engine manufacturer?**

(a) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later non-emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 kilowatt (KW) (3,000 horsepower (HP)) and a displacement of less than 10 liters per cylinder to the certification emission standards for new nonroad CI engines in 40 CFR 89.112, 40 CFR 89.113, 40 CFR 1039.101, 40 CFR 1039.102, 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, and 40 CFR 1039.115, as applicable, for all pollutants, for the same model year and maximum engine power.

(b) Stationary CI internal combustion engine manufacturers must certify their 2007 through 2010 model year non-emergency stationary CI ICE with a maximum engine power greater than 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder to the emission standards in table 1 to this subpart, for all pollutants, for the same maximum engine power.

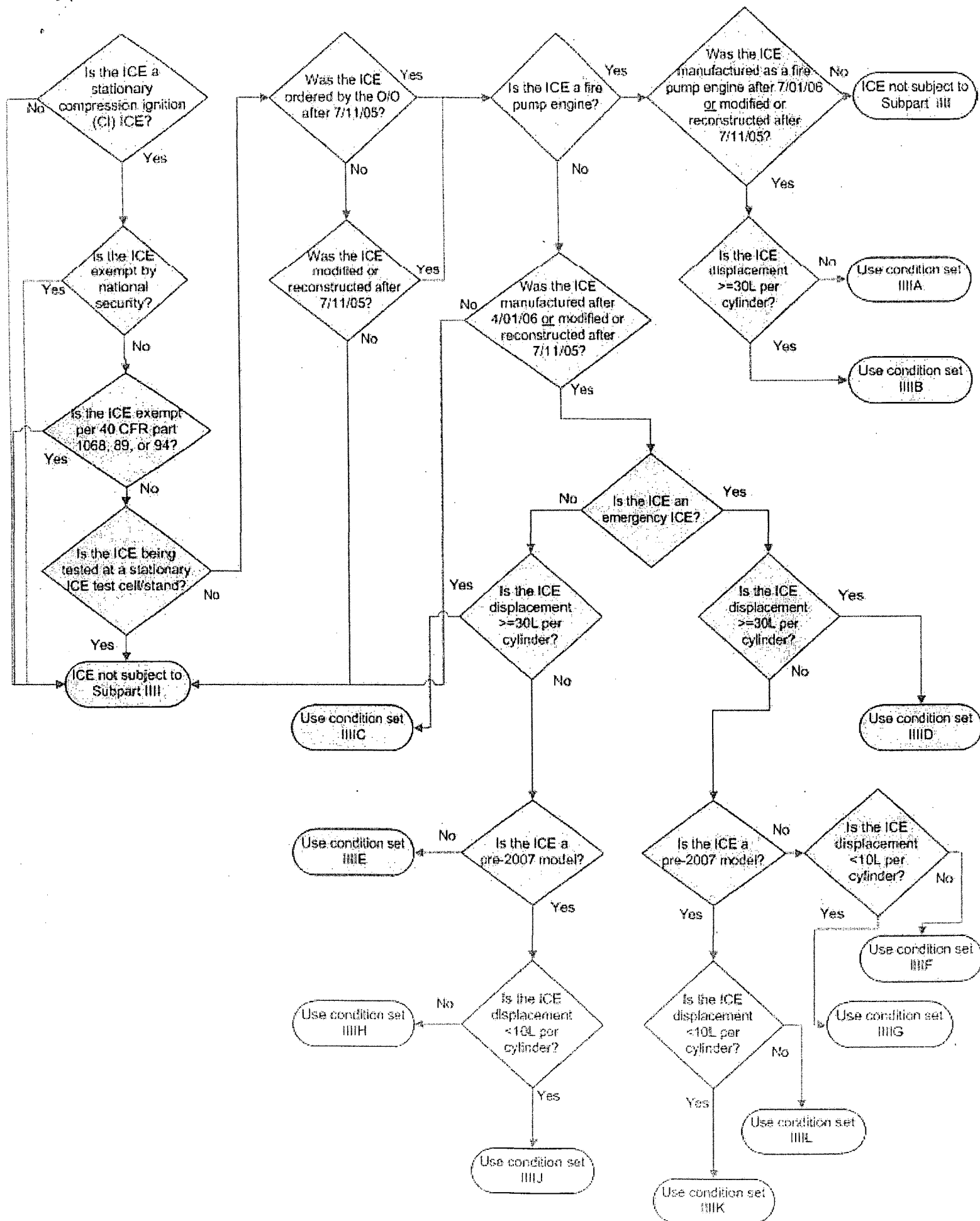
(c) Stationary CI internal combustion engine manufacturers must certify their 2011 model year and later non-emergency stationary CI ICE with a maximum engine power greater than 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder to the certification emission standards for new nonroad CI engines in 40 CFR 1039.101, 40 CFR 1039.102, 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, and 40 CFR 1039.115, as applicable, for all pollutants, for the same maximum engine power.

(d) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later non-emergency stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder to the certification emission standards for new marine CI engines in 40 CFR 94.8, as applicable, for all pollutants, for the same displacement and maximum engine power.

**Sec. 60.4202 What emission standards must I meet for emergency engines if I am a stationary CI internal combustion engine manufacturer?**

(a) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power less than or equal to 2,237





**POWERSCREEN of Florida<sup>®</sup>, Inc.**P.O. Box 5802  
Lakeland, FL 33807  
863/687-7153FAX 863/680-1289  
Website: [www.powerscreenfla.com](http://www.powerscreenfla.com)Machine Registration Form352 343  
8665Customer Name  
AddressPowerscreen of Florida, Inc.  
5125 W. Frontage Road  
Lakeland, FL 33810

Location of Machine(s)

Same

Description and Serial number of Machine(s)

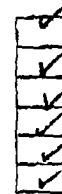
Warrior 1800 Track S.N. 12301000

- I acknowledge receipt of the above equipment complete with operation manual.



I have been instructed on the follow aspects:

- Set up the machine(s) in working position.
- Preparing the machine(s) for transport.
- Correct procedure to inspect and maintain the machine.
- Correct procedure to clean the machine(s).
- Correct procedure on machine operation.
- Safety concerning the use of and the maintenance of the machine(s).

Screening equipment

This is to confirm that I have been instructed on the following aspects:

- How to change the screen mesh / speedharp / fingerscreens.
- How to tune the screenbox.
- The importance of ensuring the screenbox remains in tune throughout operation.



Customer Name

Powerscreen of Florida, Inc.

Position

Service Manager

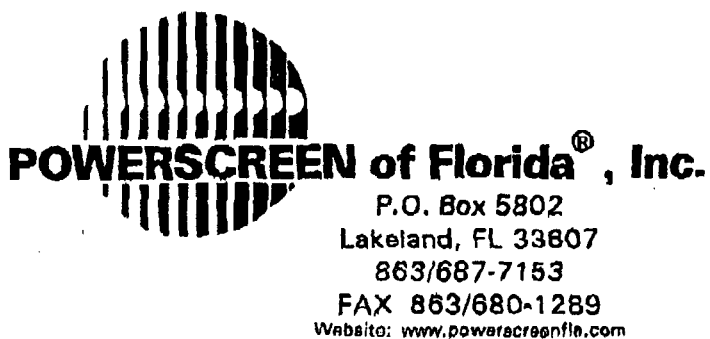
Signature of Customer

[Signature]

Signature of Distributor

Date

11/04



November 13, 2007

Hewitt Contracting  
Attn.: Clarence  
PO Box 490697  
Leesburg, FL 32749

Dear Clarence:

This letter is in reference to the Powerscreen Warrior S.N. 12301000, purchased by Hewitt Contracting in November of 2006. This machine was manufactured in 2004, registered new by Powerscreen of Florida in November of 2004.

I have attached a copy of the machine registration form that was sent to the manufacturer.

If you need anything further, please do not hesitate to call.

Regards,

POWERSCREEN OF FLORIDA, INC.

Melissa Palmer  
Administrative Assistant



Hewitt Contracting Company, Inc.

# CERTIFICATE OF COMPLETION

This is to certify that

CLIVE BROWN

Has successfully completed the

*AIR BURNER OPERATION, MAINTENANCE,  
AND SAFETY TRAINING COURSE*

On this Twenty-Ninth day of January 2007

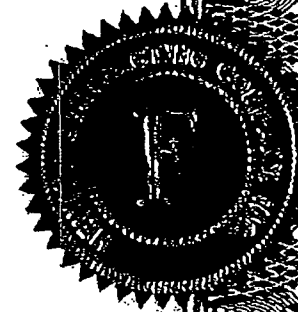


Gregg R. Byrd, Director of Safety and Health

January 29, 2007  
Date

County Road 466a Landfill—Okahumpka, Florida

Course Location





# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

November 6, 2007

Mr. Howard H. Hewitt, Managing Member  
C.R. 466A Landfill Facility, L.L.C.  
P.O. Box 490697  
Leesburg, FL 34749-0697

Dear Mr. Hewitt:

Re: Application dated October 10, 2007  
Reference Permit No. 1190036-002-AO  
DEP File No. 1190036-004-AO

On October 22, 2007, the Department received your air pollution application to renew the operating permit for your air curtain incinerator located in Sumter County. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. During my visit to your facility on November 1, 2007, the following issues need to be addressed. Therefore, for each listed issue below, explain how you have resolved the issue and the procedures you are implementing to prevent them from re-occurring.
  - A. Previous applications submitted and your Operations Guidelines Manual state the manifold's nozzles will be at a 20° angle to ensure a proper air curtain. The manifold's nozzles (spouts) were not at a 20° angle from the horizontal or vertical direction. Your response should include updating your Operations Guidelines Manual and clarify if the angle is determined from the horizontal or vertical direction.
  - B. Three (3) of the manifold's nozzles were missing, which does not provide reasonable assurance a proper air curtain can be maintained.
  - C. The pit's four (4) walls were not in a vertical position, which does not provide reasonable assurance a proper air curtain can be maintained.
  - D. The pit's length (approx. 42 feet) was more than the length of the manifold (approx. 32.5 feet), which does not provide reasonable assurance a proper air curtain can be maintained. See Specific Condition No. 10 of permit 1190036-002-AO.
  - E. The pit's width (approx. 22 feet) was more than the allowable width of 12 feet. See Specific Condition No. 10 of permit 1190036-002-AO.

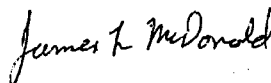
- F. Material loaded into the incinerator protruded above the air curtain. See Specific Condition No. 19 of permit 1190036-002-AO.
- G. Ash was built up higher than 1/3 the pit depth. See Specific Condition No. 20 of permit 1190036-002-AO.
- H. The pit did not have an indicator to show the pit's 1/3 depth. See Specific Condition No. 21 of permit 1190036-002-AO.
- 2. In accordance with Rule 62-297.310(7)(b), F.A.C., re-test the incinerator for visible emissions after all the necessary changes/corrections as mentioned in No. 1 above have been completed. The visible emission test shall be in accordance with the testing, notification, and reporting requirements of permit 1190036-002-AO and by January 20, 2008.
- 3. Page 3 of your Operations Guidelines Manual states the incinerator's charging rate shall not exceed 1.4 tons/hr. (daily average basis), instead of 6 tons/hr. (daily average basis). Please submit a revised page 3 of the manual to incorporate this change.
- 4. Explain how the POWERSCREEN screener and its associated diesel fired engine each qualifies to be an exempt activity per Rule 62-210.300(3), F.A.C. {Note, if the screener and/or engine do not qualify as an exempt activity, a separate after-the-fact air pollution construction application must be submitted to the Air Permitting Section of the Department's Southwest District for the affected non-exempt activity. Any such submitted application will be processed by the Department separately from this renewal application.}

NOTE – Since your response to No. 4 above would be of a technical nature to demonstrate the screener and its associated diesel engine are exempt, the response must be also certified by a professional engineer registered in the State of Florida. Therefore, your response to the above requests should include **both** your signature and the professional engineer's signature.

Your response to all of the items above should be submitted to the Air Permitting Section of the Department's Southwest District Office in conjunction with the visible emissions test report required by No. 2 above and no later than March 5, 2008. Note, the visible emission test report is required to be submitted within 45 days of testing per Rule 62-297.310(8)(b), F.A.C.

If you have any questions, please call me at 813-632-7600 extension 106.

Sincerely,



James L. McDonald  
Air Permitting Engineer

**McDonald, Jim**

---

**From:** Henry, Danielle D.  
**Sent:** Monday, November 19, 2007 9:55 AM  
**To:** McDonald, Jim  
**Cc:** Zhang-Torres  
**Subject:** FW: CR 466A Landfill 1190036-004-AO

Jim,

Good morning. It appears an RAI went out for this project one day after my deadline to respond. I also noted you have received a response to the RAI and your review is due Dec. 15, 2007. I wanted to make sure that the facility did not have any outstanding enforcement issues historically or ongoing, so I took a look at Air Common for ongoing projects and ARMS for historical data. The facility does not appear to have a record of any complaints or violations. I have no additional comments at this time.

Danielle

---

**From:** Zhang-Torres  
**Sent:** Tuesday, October 23, 2007 9:27 AM  
**To:** Galbraith, Bret; Henry, Danielle D.  
**Cc:** McDonald, Jim; Bradley, Christopher  
**Subject:** CR 466A Landfill 1190036-004-AO

Company Name/Site: C.R. 466A Landfill Facility  
Project Number: 1190036-004-AO  
Receipt Date: 10/22/07  
Response Due Date: 11/05/07  
Existing Permit No.: 1190036-002-AO

Assigned Inspector: Bret Galbraith

Last Facility Inspection (ARMS): 10/31/06

Permit Engineer: Jim McDonald

This is an operation permit renewal application for an ACI. Please let the Permit Engineer know by the date above if you have any changes for the permit, items to add to a potential incompleteness letter, or any other concerns you may have with this project OR IF YOU DO NOT HAVE ANY COMMENTS.

Cindy Zhang-Torres, PE III  
Air Permitting Supervisor  
FDEP  
Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: (813)632-7600, ext. 107

11/19/2007

Fax: (813)632-7668

Please note: Florida has a broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your email is communications and may therefore be subject to public disclosure.

11/19/2007



## McDonald, Jim

---

**From:** Zhang-Torres  
**Sent:** Tuesday, October 23, 2007 9:27 AM  
**To:** Galbraith, Bret; Henry, Danielle D.  
**Cc:** McDonald, Jim; Bradley, Christopher  
**Subject:** CR 466A Landfill 1190036-004-AO

Company Name/Site: C.R. 466A Landfill Facility  
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Existing Permit No.: 1190036-002-AO

Assigned Inspector: Bret Galbraith

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Permit Engineer: Jim McDonald

This is an operation permit renewal application for an ACI. Please let the Permit Engineer know by the date above if you have any changes for the permit, items to add to a potential incompleteness letter, or any other concerns you may have with this project OR IF YOU DO NOT HAVE ANY COMMENTS.

Cindy Zhang-Torres, PE III  
Air Permitting Supervisor  
FDEP  
Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: (813)632-7600, ext. 107  
Fax: (813)632-7668

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10/23/2007

## Nasca, Mara

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**From:** Falandysz, Cynthia  
**Sent:** Friday, August 22, 2008 7:54 AM  
**To:** Nasca, Mara  
**Subject:** FW: Additional Information needed for CR 466A Landfill Facility, LLC

Did you ever respond to him concerning this email?

Cindy Falandysz  
Florida Department of Environmental Protection  
Air Resource Management  
13051 N. Telecom Parkway  
Temple Terrace, FL 33637-0926  
813.632.7600, extension 123  
email: [Cynthia.Falandysz@dep.state.fl.us](mailto:Cynthia.Falandysz@dep.state.fl.us)

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**From:** Noble, Ron [<mailto:rnoble@fowlerwhite.com>]  
**Sent:** Friday, August 15, 2008 2:50 PM  
**To:** Falandysz, Cynthia; Sherman, Meredith  
**Cc:** Nasca, Mara; McDonald, Jim; Zhang-Torres  
**Subject:** RE: Additional Information needed for CR 466A Landfill Facility, LLC

Hi Cindy:

I know you were not at our meeting on July 24, but I think you are aware that CR 466 Landfill does not own or operate the mobile concrete crusher that was observed at the landfill. This crusher is owned/operated by an unrelated third party contractor who comes to the landfill and sets up temporarily to crush and recycle the concrete every year or 18 months (maybe even longer in the current market). CR 466 Landfill is still trying to decide how to handle this issue. Mr. Hewitt is out of town for the next 10 days, and we should have a path forward in the next several weeks. The facility will not need to crush concrete for at least 6 months, and more likely 8-10 months. Therefore, we have some time to figure out how to proceed. The landfill is currently evaluating operational modifications that could address the permitting issues for the mobile crusher. Again, we will have some additional details and information within the next several weeks.

Thanks,  
Ron

Ronald H. Noble  
Fowler White Boggs Banker  
501 E. Kennedy Blvd.  
Suite 1700  
Tampa, FL 33602

(813) 222-1175  
(813) 229-8313

[rnoble@fowlerwhite.com](mailto:rnoble@fowlerwhite.com)

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**From:** Falandysz, Cynthia [<mailto:Cynthia.Falandysz@dep.state.fl.us>]  
**Sent:** Thursday, August 14, 2008 1:21 PM  
**To:** Sherman, Meredith; Noble, Ron

**Cc:** Nasca, Mara; McDonald, Jim; Zhang-Jorres

**Subject:** Additional Information needed for CR 466A Landfill Facility, LLC

Hi Meredith and Ron,

The Department received your response to the penalty calculation, dated August 6, 2008, and it is currently under review. During the meeting on July 24, 2008, there was discussion concerning the unpermitted on-site crusher. Your July 24, 2008 response did not indicate when CR 466 Landfill Facility would be submitting their application for the unpermitted crusher. The meeting discussion concerning enforcement discretion for the unpermitted crusher was based on CR 466A Landfill resolving this issue quickly. Please provide a timeframe for the application submittal.

Thanks for your cooperation.

Cindy Falandysz

Florida Department of Environmental Protection

Air Resource Management

13051 N. Telecom Parkway

Temple Terrace, FL 33637-0926

813.632.7600, extension 123

email: [Cynthia.Falandysz@dep.state.fl.us](mailto:Cynthia.Falandysz@dep.state.fl.us)

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If you desire a formal opinion on a particular tax matter for the purpose of avoiding the imposition of any penalties, we will discuss the additional Treasury requirements that must be met and whether it is possible to meet those requirements under the circumstances, as well as the anticipated time and additional fees involved.

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