



# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi A. Drew  
Secretary

September 30, 2010

*Electronic Mail – Received Receipt Requested*

Tim Hawkins, South Florida Market Area Vice President  
Waste Management, Inc. of Florida  
2700 Northwest 48<sup>th</sup> Street  
Pompano Beach, FL 33073

Re: **Request for Additional Information**  
Project No. 0250615-012-AC (PSD-FL-414)  
Waste Management, Inc. of Florida, Medley Landfill  
Landfill Gas-to-Energy Project Request for Additional Modeling Information

Dear Mr. Hawkins:

On September 1, 2010, we received the modeling information for your application for an air construction permit to construct and operate a landfill gas-to-energy facility at Medley Landfill, which will use landfill gas as fuel for six Caterpillar (CAT 3520) engines. The facility is located in Miami-Dade County at 9350 Northwest 89<sup>th</sup> Avenue in Medley, Florida. The application indicates that the project is subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality pursuant to Rule 62-212.400, of the Florida Administrative Code (F.A.C.). The application is incomplete with respect to the modeling information provided. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Based on information provided in the application, the representativeness of the background concentrations used in the particulate matter less than 2.5 microns (PM<sub>2.5</sub>) and 1-hour nitrogen dioxide (NO<sub>2</sub>) modeling analyses were not given. Please give detailed information on the representativeness of these data. Also provide a copy of the monitoring background data used for the PM<sub>2.5</sub> and NO<sub>2</sub> analyses.
2. Section 6.5 of the application gives the rationale for using the urban option in the American Meteorological Society and Environmental Protection Agency Regulatory Model (AERMOD). The heat island effect was not mentioned as a concern. Consult the AERMOD Implementation Guide, dated March 19, 2009, and address whether the heat island effect is of concern. What population value was used as a surrogate? Provide further clarification on the use of the urban mode instead of the rural mode.
3. Table 6-11 in the application gives a value for the monitored background 1-hour NO<sub>2</sub> concentration to be added to the modeled sources results. However, the monitored background concentration for determining Tier 1 or Tier 2 one hour NO<sub>2</sub> impacts for comparison with the ambient air quality standard should be based on the concentration recommended on page 18, first paragraph of Anna Marie Wood's (OAQPS) memorandum, dated June 28, 2010, "General Guidance for Implementing the 1-hour NO<sub>2</sub> National Ambient Air Quality Standard in Prevention of Significant Deterioration Permits, Including an Interim 1-hour NO<sub>2</sub> Significant Impact Level." This memorandum is embedded in Stephen Page's (OAQPS) memorandum, dated June 29, 2010, "Guidance Concerning the Implementation of the 1-hour NO<sub>2</sub> NAAQS for the Prevention of Significant Deterioration Program." Also update the NO<sub>2</sub> background table on page 51 of the application.

## REQUEST FOR ADDITIONAL INFORMATION

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4. Tables D-1 and D-3 in the application provide a summary of NO<sub>2</sub> and CO sources and their respective emission rates for the cumulative source inventory to be used in the multi-source analysis required for these pollutants. These pollutants have short term air quality standards. Verify that these emission rates are for the respective time periods, or create approximate values, if necessary, for these short term emission rates to be used in any updated modeling analyses.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We have not yet received comments from the National Park Service (NPS). These will be forwarded to you as soon as received.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact me at 850/921-8986.

Sincerely,



Cleve Holladay, Meteorologist  
New Source Review Section

This letter was sent to the following persons by electronic mail with received receipt requested.

Mr. Tim Hawkins, Waste Management, Inc. (thawkins@wm.com)  
Mr. James Kisiel, P.E., Waste Management Inc. (jkisiel@wm.com)  
Mr. David A. Buff, P.E., Golder Associates Inc. (dbuff@golder.com)  
Mr. Lennon Anderson, SED Office (lennon.anderson@dep.state.fl.us)  
Ms. Mallika Muthias, Miami-Dade DERM (muthim@miamidade.gov)  
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)  
Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)  
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)  
Mr. Dee Morse, National Park Service Air Resource Division ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))

CGH/cgh

## Walker, Elizabeth (AIR)

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**From:** Walker, Elizabeth (AIR)  
**Sent:** Thursday, September 30, 2010 3:41 PM  
**To:** 'thawkins@wm.com'  
**Cc:** 'jkisiel@wm.com'; Mr. David A. Buff, P.E., Golder Associates, Inc.; Anderson, Lennon; Muthiah, Mallika (DERM); 'Forney.Kathleen@epamail.epa.gov'; 'abrams.heather@epamail.epa.gov'; Gibson, Victoria; 'dee\_morse@nps.gov'; Holladay, Cleve; Koerner, Jeff; McWade, Tammy; Livingston, Sylvia  
**Subject:** RAI: Waste Management, Inc. of Florida, Medley Landfill - 0250615-012-AC/PSD-FL-414  
**Attachments:** RAI\_0250615-012-ACpdf.pdf

Dear Sir/Madam:

**Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).**

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

*Elizabeth Walker*  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

Note: The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

## Walker, Elizabeth (AIR)

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**From:** Hawkins, Tim [THawkins@wm.com]  
**Sent:** Thursday, September 30, 2010 9:40 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** RE: Waste Management, Inc. of Florida, Medley Landfill - 0250615-012-AC/PSD-FL-414

I can view the documents. Thanks.

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**From:** Walker, Elizabeth (AIR) [mailto:Elizabeth.Walker@dep.state.fl.us]  
**Sent:** Thursday, September 30, 2010 3:41 PM  
**To:** Hawkins, Tim  
**Cc:** Kisiel, James; Mr. David A. Buff, P.E., Golder Associates, Inc.; Anderson, Lennon; Muthiah, Mallika (DERM); Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; dee\_morse@nps.gov; Holladay, Cleve; Koerner, Jeff; McWade, Tammy; Livingston, Sylvia  
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*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

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## Walker, Elizabeth (AIR)

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**From:** Kisiel, James [JKisiel@wm.com]  
**Sent:** Monday, October 04, 2010 12:14 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** RE: Waste Management, Inc. of Florida, Medley Landfill - 0250615-012-AC/PSD-FL-414

Thank you

Respectfully Yours,

James Kisiel, P.E.  
Project Manager  
1001 Fannin Street, Suite 4000  
Houston, Texas 77002

713 823 7068

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**From:** Walker, Elizabeth (AIR) [mailto:Elizabeth.Walker@dep.state.fl.us]  
**Sent:** Thursday, September 30, 2010 2:41 PM  
**To:** Hawkins, Tim  
**Cc:** Kisiel, James; Mr. David A. Buff, P.E., Golder Associates, Inc.; Anderson, Lennon; Muthiah, Mallika (DERM); Forney.Kathleen@epamail.epa.gov; abrams.heather@epamail.epa.gov; Gibson, Victoria; dee\_morse@nps.gov; Holladay, Cleve; Koerner, Jeff; McWade, Tammy; Livingston, Sylvia  
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*Elizabeth Walker*  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
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## Walker, Elizabeth (AIR)

---

**From:** Kisiel, James [JKisiel@wm.com]  
**To:** Walker, Elizabeth (AIR)  
**Sent:** Thursday, September 30, 2010 6:21 PM  
**Subject:** Read: RAI: Waste Management, Inc. of Florida, Medley Landfill - 0250615-012-AC/PSD-FL-414

Your message was read on Thursday, September 30, 2010 6:21:19 PM (GMT-05:00) Eastern Time (US & Canada).

## Walker, Elizabeth (AIR)

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**From:** Dee\_Morse@nps.gov  
**Sent:** Friday, October 01, 2010 12:09 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** Re: RAI: Waste Management, Inc. of Florida, Medley Landfill - 0250615-012-AC/PSD-FL-414

Message received.

Dee Morse  
Environmental Protection Specialist  
Air Resources Division  
Natural Resource Program Center  
National Park Service  
Phone: 303 969-2817  
Fax: 303 969-2822  
e-mail: [dee\\_morse@nps.gov](mailto:dee_morse@nps.gov)

Please consider the environment before printing this email. Think Green!

"Walker,  
Elizabeth (AIR)"  
<Elizabeth.Walker  
@dep.state.fl.us>

09/30/2010 01:40  
PM

To  
"thawkins@wm.com" <[thawkins@wm.com](mailto:thawkins@wm.com)>  
cc

"jkisiel@wm.com" <[jkisiel@wm.com](mailto:jkisiel@wm.com)>,  
"Mr. David A. Buff, P.E., Golder  
Associates, Inc."  
<[dbuff@golder.com](mailto:dbuff@golder.com)>, "Anderson,  
Lennon"  
<[Lennon.Anderson@dep.state.fl.us](mailto:Lennon.Anderson@dep.state.fl.us)>,  
"Muthiah, Mallika (DERM)"  
<[MuthiM@miamidade.gov](mailto:MuthiM@miamidade.gov)>,  
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<[Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov)>,  
"abrams.heather@epamail.epa.gov"  
<[abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov)>,  
"Gibson, Victoria"  
<[Victoria.Gibson@dep.state.fl.us](mailto:Victoria.Gibson@dep.state.fl.us)>,  
"dee\_morse@nps.gov"  
<[dee\\_morse@nps.gov](mailto:dee_morse@nps.gov)>, "Holladay,  
Cleve"  
<[Holladay\\_C@dep.state.fl.us](mailto:Holladay_C@dep.state.fl.us)>,  
"Koerner, Jeff"  
<[Jeff.Koerner@dep.state.fl.us](mailto:Jeff.Koerner@dep.state.fl.us)>,  
"McWade, Tammy"  
<[Tammy.McWade@dep.state.fl.us](mailto:Tammy.McWade@dep.state.fl.us)>,  
"Livingston, Sylvia"  
<[Sylvia.Livingston@dep.state.fl.us](mailto:Sylvia.Livingston@dep.state.fl.us)>

Subject

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Florida, Medley Landfill -  
0250615-012-AC/PSD-FL-414