

Adams, Patty

From: David Derenzo [dderenzo@derenzo.com]
Sent: Monday, October 30, 2006 10:30 AM
To: Adams, Patty
Subject: RE: Facility 0310358-004-AC-D - Trail Ridge Energy

DEP, Bureau of Air Regulation

The email message is being sent to verify I have received the documents.

Thank you

David Derenzo

From: Adams, Patty [mailto:Patty.Adams@dep.state.fl.us]
Sent: Thursday, October 26, 2006 5:19 PM
To: robinson@coj.net; jeff.pope@us.bureauveritas.com; dderenzo@derenzo.com
Subject: FW: Facility 0310358-004-AC-D - Trail Ridge Energy

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 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 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>.

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,

DEP, Bureau of Air Regulation

Adams, Patty

From: Scott Salisbury [Scott.salisbury@landfillenergy.com]
Sent: Friday, October 27, 2006 2:05 PM
To: Adams, Patty
Cc: bill.owen1@verizon.net; Sheila Miller; Michael Laframboise
Subject: RE: Spam: FW: Facility 0310358-004-AC-D - Trail Ridge Energy

Verifying receipt of the documents.

From: Adams, Patty [mailto:Patty.Adams@dep.state.fl.us]
Sent: Thursday, October 26, 2006 5:13 PM
To: Scott Salisbury
Cc: Gibson, Victoria; Harvey, Mary; Arif, Syed
Subject: Spam: FW: Facility 0310358-004-AC-D - Trail Ridge Energy

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 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).

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Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: John_Bunyak@nps.gov
Sent: Thursday, October 26, 2006 5:43 PM
To: Adams, Patty
Subject: Re: FW: Facility 0310358-004-AC-D - Trail Ridge Energy

got it.

Adams, Patty

From: jeff.pope@us.bureauveritas.com
Sent: Friday, October 27, 2006 9:20 AM
To: Adams, Patty
Subject: Re: FW: Facility 0310358-004-AC-D - Trail Ridge Energy
Attachments: 0310358.004.AC.D_pdf.zip

I received your e-mail.

Thanks

Jeffery L. Pope, P.E.
Vice President
Director of Remediation Engineering
Clayton Group Services
A Bureau Veritas Company
3140 Finley Road
Downers Grove, IL 60515
Direct: 630-795-3211
Fax: 630-795-1102
Cell: 630-803-0274
jeff.pope@us.bureauveritas.com
www.us.bureauveritas.com

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"Adams, Patty" <Patty.Adams@dep.state.fl.us>

To <robinson@coj.net>, Jeff Pope/USA/VERITAS@VERITAS, <dderenzo@derenzo.com>

cc

10/26/2006 04:18 PM

Subject FW: Facility 0310358-004-AC-D - Trail Ridge Energy

10/27/2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4APT-ATMB

OCT 19 2006

RECEIVED

OCT 28 2006

BUREAU OF AIR REGULATION

Joseph Kahn, Acting Director
Division of Air Resource Management
FL Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Kahn:

The purpose for this letter is to provide you with a determination regarding emission limit applicability and monitoring requirements for landfill gas that will be combusted in internal combustion engines to produce electricity at the following landfills located in Florida:

Trail Ridge Landfill (Baldwin, Florida)

Brevard County Landfill (Cocoa, Florida)

Seminole County Landfill (Geneva, Florida)

These landfills are subject to 40 CFR Part 60, Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills), and a consultant (Derenzo and Associates, Inc.) representing the owners of all three sites submitted applicability determination requests to the U.S. Environmental Protection Agency (EPA) Region 4 and to your agency. The primary question posed in these requests is whether the landfill gas processing operations at these sites constitute "treatment" as this term is defined under Subpart WWW. Based upon our review of the information provided with the applicability determination request, we concluded that the gas processing conducted at the three landfills in question does constitute treatment under Subpart WWW. Therefore, the gas leaving the treatment systems at these landfills is no longer subject to the control and monitoring requirements in Subpart WWW. Details regarding the gas processing systems at these sites and the basis for our determination are provided in the remainder of this letter.

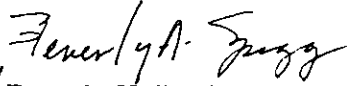
Derenzo and Associates requested a determination regarding whether the gas processing at the three landfills in Florida constitutes treatment because gas that has been treated is no longer subject to the control requirements in Subpart WWW. Under provisions in 40 CFR §60.752(b)(2)(iii), gas collected from landfills subject to Subpart WWW must be routed to either a flare, a control system that reduces nonmethane organic compound (NMOC) emissions by 98 weight-percent, an enclosed combustor, or a

treatment system that processes the gas for subsequent sale or use. If an enclosed combustor is used, NMOC emissions must be reduced by either 98 weight-percent or to a concentration of less than 20 parts per million as hexane, corrected to three percent oxygen. Although landfill gas is no longer subject to the control requirements in Subpart WWW after it has been processed for subsequent sale or use, emissions from any atmospheric vents in the treatment system must be sent to a control system (flare, enclosed combustor, etc.) that complies with the removal efficiency standards in the rule.

According to the process description that Derenzo and Associates provided with its applicability determination requests, gas collected at the three landfills in question is filtered to remove particles larger than one micron, dewatered, and compressed. According to several previous U.S. Environmental Protection Agency (EPA) determinations, a landfill gas processing operation that includes filtration to ten microns or less, dewatering, and compression constitutes treatment in accordance with provisions in 40 CFR §60.752(b)(2)(iii)(C). Since the gas processing operations at the three landfills in question include all of the steps cited in EPA's previous determinations, they constitute treatment systems for Subpart WWW purposes, and the treated gas leaving these systems will no longer be subject to control or monitoring requirements under the rule.

If you have any questions about the determination provided in this letter, please contact Mr. David McNeal of the EPA Region 4 staff at (404) 562-9102.

Sincerely,


Beverly H. Banister
Director
Air, Pesticides and Toxics
Management Division

cc: Syed Arif
Division of Air Resource Management
FL Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400