

Walker, Elizabeth (AIR)

From: Arif, Syed
Sent: Tuesday, January 05, 2010 11:21 AM
To: Walker, Elizabeth (AIR)
Subject: FW: Trail Ridge Landfill - Condition C.3. of Permit No. 031035-004-AC

From: Arif, Syed
Sent: Tuesday, February 19, 2008 11:44 AM
To: Felton-Smith, Rita
Cc: Koerner, Jeff
Subject: RE: Trail Ridge Landfill - Condition C.3. of Permit No. 031035-004-AC

Rita,

The higher emission factor that incorporates all detectable chemicals should be compared with the permit limits for SO₂ and HCl. Both the pollutants are much below the permitted limit of 27.5 lb/MMscf for SO₂ and 11.95 lb/MMscf for HCl. These limits for SO₂ and HCl were established in the permit so the facility can avoid PSD review for SO₂ and stay a minor source of HAP emissions for HCl. Please let me know if there are any other questions.

Syed

From: Felton-Smith, Rita
Sent: Monday, February 18, 2008 11:29 AM
To: Arif, Syed
Cc: Koerner, Jeff
Subject: Trail Ridge Landfill - Condition C.3. of Permit No. 031035-004-AC

Syed,

Condition C.3. of Trailridge's construction permit for the engine plant states that the permittee shall sample analyze the landfill gas for sulfur and chlorine content on a semi-annual basis. The results of the analysis shall be reported as SO₂ and HCl emission factors in terms of lb/MMscf of landfill gas.

In a letter to Trina dated October 24, 2007, the facility submitted testing results. They proposed the following emission factors:

7.94 lb SO₂/MMscf of LFG (<8.48 lb/MMscf of landfill gas with the incorporation of all non-measured chemicals at its reporting limit) I think the reporting limit may be the detection limit.

1.43 lb HCl/MMscf of LFG (<3.19 lb/MMscf of landfill gas with the incorporation of all non-measured chemicals at its reporting limit)

I am trying to confirm which emission factor was accepted as the emission factor for each pollutant (i.e. without all measured chemicals or with all measured chemicals).

Thank you.

Rita

Rita Felton-Smith
Air Permitting Engineer IV

Florida Department of Environmental Protection
Northeast District
(904) 807- 3237
Rita.Felton-Smith@dep.state.fl.us