



**NASSAU COUNTY**  
**BOARD OF COUNTY COMMISSIONERS**  
P. O. Box 1010  
Fernandina Beach, Florida 32035-1010

Nick Deonas  
David C. Howard  
Vickie Samus  
Floyd L. Vanzant  
Marianne Marshall

Dist. No. 1 Fernandina Beach  
Dist. No. 2 Fernandina Beach  
Dist. No. 3 Yulee  
Dist. No. 4 Hilliard  
Dist. No. 5 Callahan

May 13, 2002

Ms. Cindy Phillips, P.E.  
FDEP Bureau of Air Regulation  
MS 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
MAY 15 2002  
BUREAU OF AIR REGULATION

JOSEPH M. "Chip" OXLEY, JR.  
Ex-Officio Clerk

MICHAEL S. MULLIN  
County Attorney

WALTER D. GOSSETT  
County Coordinator

RE: Clean Air Act Section 112(j) Part I Notification  
Nassau County Landfill  
Facility ID No: 0890428-001

Dear Ms. Phillips:

Section 112(j) of the Clean Air Act as amended in 1990 requires an owner or operator of a major source to apply for a Title V permit should the U.S. EPA fail to promulgate emissions standards for an applicable source category under Section 112(c) within 18 months after the promulgation deadline specified in the Act. The deadline for EPA to issue these standards is May 15, 2002.

The US EPA, pursuant to the proposed National Emission Standard for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste Landfills published in the Federal Register on 11/7/2000, has determined that landfills with a design capacity greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters and have or will have NMOC emissions greater than 50 Mg/year will be major sources of HAPs.

The Nassau County Landfill has a design capacity of greater than 2.5 million cubic meters, and is subject to the NSPS. However, the facility has projected using the EPA's LANDGEM model not to exceed the 50 Mg/Year of NMOCs or be major for a single HAP or a combination of HAPs. Therefore, the facility appears to be subject to the Landfill MACT as currently written.

Notification is provided herein to fulfill the obligations put forth in the rule for major source facilities whose source category standard will not be promulgated by the regulatory deadline of May 15, 2002 because it appears they will be subject to the MACT as potential an area source and not a major source as the proposed rule is written. This

(904) 225-2610 Board Room; 321-5703, 879-1029, (800) 958-3496

*An Affirmative Action / Equal Opportunity Employer*

submittal is for the express purpose of fulfilling the obligations of 112(j). It does not, for the purposes of any other program applicable under the Clean Air Act, establish that the facility is in fact a major source of HAPs and should not be used for any other purpose. The presumed NESHAP applicability status attributed to the source category pursuant to the proposed standard in no way construes that the source is major by exceeding 10 tons of HAPs on an individual basis or 25 tons in aggregate.

Please contact Ms. Leesa Gerald of Golder Associates at (904) 363-3430 ext.244 if you have any questions regarding this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Deonas", with a horizontal line extending to the left.

Nick Deonas, Chairman of Nassau County Board of Commissioners

cc: Mr. Robert P. McIntyre, Nassau County Solid Waste Director  
Ms. Leesa Gerald, Golder Associates  
Mr. Walter Gossett, Nassau County Coordinator