

RECEIVED

OCT 14 2010

BUREAU OF
AIR REGULATION

APPLICATION TO REVISE AIR CONSTRUCTION PERMIT FOR LANDFILL GAS-TO-ENERGY PROJECT

Okeechobee Landfill

Prepared For: Okeechobee Landfill, Inc.
10800 N.E. 128th Avenue
Okeechobee, FL 34972

Submitted By: Golder Associates Inc.
6026 NW 1st Place
Gainesville, FL 32607 USA

Distribution: 4 Copies – FDEP
2 Copies – Okeechobee Landfill, Inc.
2 Copies – Golder Associates Inc.

October 2010

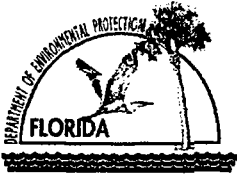
103-87579

A world of
capabilities
delivered locally



APPLICATION FOR AIR CONSTRUCTION PERMIT

LONG - FORM



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

RECEIVED

OCT 14 2010

BUREAU OF AIR REGULATION

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Okeechobee Landfill, Inc.	
2. Site Name: Okeechobee Landfill	
3. Facility Identification Number: 0930104	
4. Facility Location... Street Address or Other Locator: 10800 N.E. 128th Avenue City: Okeechobee County: Okeechobee Zip Code: 34972	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Charles Orcutt, MA Engineer	
2. Application Contact Mailing Address... Organization/Firm: Okeechobee Landfill, Inc. Street Address: 10800 N.E. 128th Avenue City: Okeechobee State: FL Zip Code: 34972	
3. Application Contact Telephone Numbers... Telephone: (863) 357-0824 ext. 231 Fax: ()	
4. Application Contact E-mail Address: corcutt1@wm.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 10/12/10	3. PSD Number (if applicable): 382A
2. Project Number(s): 0930104-015-AC	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This application is to modify certain conditions of air construction permit No. 0930104-014-AC issued on April 19, 2010.

The conditions to be modified were described in the comment letter to the Department dated March 30, 2010, which are also summarized in the Department's Final Determination for Permit No. 0930104-014-AC.

The requested modifications are presented in Attachment A.

There are no changes to any emissions unit information as a result of this application and therefore, the emissions unit sections are not included.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
001	Municipal solid waste landfill with LFGCS and GDP	ACM1	
003	Existing 3,000 scfm enclosed flare - to be deactivated	ACM1	
004A - 004B	Two 1,500 scfm open flares	ACM1	
005	Existing 3,000 scfm enclosed flare - to be deactivated	ACM1	
006	New 3,000 scfm open flare	ACM1	
007	New 3,000 scfm open flare	ACM1	
008	New 3,000 scfm open flare	ACM1	
009	New 3,000 scfm open flare	ACM1	
016	One 15 MW Solar Titan 130 (T-130) CTG	ACM1	
017 - 019	Three 3.5 MW Solar Centaur 40 (C-40) CTGs	ACM1	

Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Tim Hawkins	
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Waste Management Inc of Florida Street Address: 2700 Wiles Rd City: Pompano Beach State: FL Zip Code: 33073	
3. Owner/Authorized Representative Telephone Numbers... Telephone: (954) 984 - 2000 ext. Fax: (954) 984 - 2058	
4. Owner/Authorized Representative E-mail Address: thawkins@wm.com	
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>	
 _____ Signature	<u>10-11-10</u> Date

APPLICATION INFORMATION

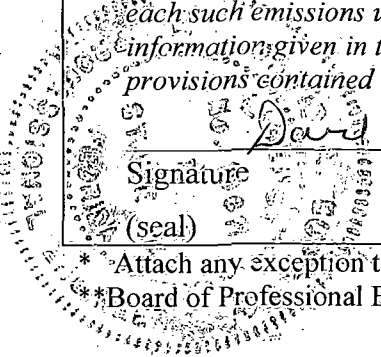
Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name:			
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):			
<input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.			
<input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively.			
<input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.			
<input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.			
3. Application Responsible Official Mailing Address...			
Organization/Firm:			
Street Address:			
City:	State:	Zip Code:	
4. Application Responsible Official Telephone Numbers...			
Telephone: ()	ext.	Fax: ()	
5. Application Responsible Official E-mail Address:			
6. Application Responsible Official Certification:			
<p>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</p>			
_____ Signature		_____ Date	

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address... Organization/Firm: Golder Associates Inc.** Street Address: 6026 NW 1st Place City: Gainesville State: FL Zip Code: 32607
3. Professional Engineer Telephone Numbers... Telephone: (352) 336-5600 ext. 545 Fax: (352) 336-6603
4. Professional Engineer E-mail Address: dbuff@golder.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature: <u>David A. Buff</u> Date: <u>10/11/10</u> (seal)

* Attach any exception to certification statement.

**Board of Professional Engineers Certificate of Authorization #00001670.

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
Particulate Matter Total - PM	A	N
Particulate Matter - PM10	A	N
Particulate Matter - PM2.5	A	N
Sulfur Dioxide - SO2	A	N
Nitrogen Oxides - NOX	A	N
Carbon Monoxide - CO	A	N
Volatile Organic Compounds - VOC	B	N
Non-Methane Organic Compounds - NMOC	B	N

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: Oct. 2008
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: Oct. 2008
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: Oct. 2008

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: Attachment A
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: Attachment A
4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable (revision application)

2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
 Attached, Document ID: _____
 Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
 Attached, Document ID: _____
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____
 Equipment/Activities Onsite but Not Required to be Individually Listed
 Not Applicable

5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: _____ Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not an Acid Rain source)

Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not a CAIR source)

Additional Requirements Comment

Empty rectangular box for additional requirements comment.

ATTACHMENT A
REPORT

ATTACHMENT A
AIR CONSTRUCTION PERMIT APPLICATION FOR THE MODIFICATION OF
PERMIT CONDITIONS OF PERMIT NO. 0930104-014-AC

EXECUTIVE SUMMARY

Okeechobee Landfill, Inc. (OLI) is requesting that the Florida Department of Environmental Protection (FDEP) modify certain conditions of air construction (AC) permit No. 0930104-014-AC for the landfill gas-to-energy (LFGTE) project at the Okeechobee Landfill, which was issued on April 19, 2010. AC permit No. 0930104-014-AC authorizes OLI to construct a landfill gas (LFG) desulfurization plant (GDP) and a LFGTE plant consisting of one 15-megawatt (MW) Solar Titan 130 and three 3.5-MW Solar Centaur 40 combustion turbine generators (CTGs). The AC permit also authorizes construction of four new 3,000-standard cubic feet per minute (scfm) open flares and one 1,500-scfm open flare.

After the draft AC permit was issued on February 1, 2010, Golder Associates Inc. (Golder) reviewed the permit conditions with OLI and wrote a letter to FDEP on March 30, 2010, with comments and requests to revise several conditions. FDEP issued the final permit on April 19, 2010, without any changes to the draft permit. However, in the Final Determination, FDEP responded to the March 30 comments and stated that they would entertain the revision of certain conditions through a permit modification application.

This application is submitted to request the revisions described in the Project Description section below. Except for few minor changes, these are the same as the requests contained in the March 30, 2010 comment letter. Since there are no emissions increases associated with these requests, this permit condition revision is not a "modification" as defined in Rule 62-210.200(205), Florida Administrative Code (F.A.C.). Therefore, a minor source air construction permit or permit amendment is requested to implement these changes.

The air permit application consists of the appropriate portions of application form [Parts I and II; DEP Form 62-210.900(1)], a description of the proposed permit amendment, and rule applicability. Since there are no changes to any emissions units, emissions process, or emissions, the Emissions Unit Information section (Part III) of DEP Form 62-210.900(1) is not included with this application.

PROJECT DESCRIPTION

In this application, OLI is requesting revisions to several conditions of AC permit No. 0930104-014-AC, issued on April 19, 2010. These requested revisions are based on OLI's comments on the draft permit provided to FDEP in the letter dated March 30, 2010. Some of the requests in the March 30 letter are not part of this request, as OLI has found the conditions acceptable.

The permit conditions and the requested revisions are provided below along with an explanation for the request:

- **Conditions II.7 and III.A.1** – OLI has selected a vendor for the design and construction of the GDP, and is currently working on contract language. Barring no delays due to weather, hurricane, or a construction-related issue, OLI should complete the GDP construction by January 1, 2012. However, OLI requires some time to operate the GDP in “shake-out” mode or to allow for a construction delay. Therefore, OLI is requesting that the January 1, 2012 deadline be extended to March 31, 2012, to allow for unseen construction delays and allow a start-up “shake out” period.
- **Section III.A, Emission Unit Description** – Please delete the statements “This emission unit is expected to be closed by 2012” under the description for Berman Road Landfill and “This landfill is expected to be open by 2012” under the description for Clay Farm Landfill. These dates are subject to revision at any time and are not accurate. OLI, therefore, requests that these statements be deleted from the permit.
- **Condition III.A.8** – OLI requests that the requirement for a H₂S continuous emissions monitoring system (CEMS) be removed and proposes daily monitoring instead. An H₂S CEMS is very costly (estimated at \$150,000) due to redundancy requirements and will place undue burden on OLI. OLI proposes to monitor and record, each operating day, the concentration of H₂S in the LFG after it is processed by the GDP and before it is combusted in the CTG or the backup flares. The LFG may be monitored at only one location if monitoring at this location accurately represents the concentration of H₂S in the LFG being combusted. The sulfur content of the LFG will be determined using total sulfur methods described in the Code of Federal Regulations, Title 40, Part 60 (40 CFR 60), Section 60.335(b)(10). Please note that Waste Management Inc. of Florida’s Central Landfill in Pompano Beach, Florida, operates a LFGTE plant with three CTGs and is required to monitor sulfur content of fuel on a daily basis. The FDEP previously requested that a daily H₂S testing protocol be submitted as part of the permit comments so the site could use this method of H₂S testing. A H₂S daily sulfur testing protocol is attached to this application (See Attachment B), as previously requested by the FDEP.
- **Condition III.A.9** – OLI agrees with the monthly recordkeeping requirements. However, the monthly reporting requirements will add additional burden on OLI, which seems unnecessary. OLI requests a quarterly or semi-annual reporting requirement in lieu of monthly, which is consistent with many other permits.
- **Condition III.A.10** – OLI requests that with the removal/change of the requirement for H₂S CEMs, the reference to H₂S CEMs be deleted from the 4th bullet of the condition.
- **Condition III.B.1** – The first sentence as stated appears to indicate that the flares are installed as backup devices for the CTGs. The three Solar Centaur CTGs and the Solar Titan CTG have the capacity to combust a total of 9,500 scfm LFG and the rest of LFG will be combusted using the flares. The flares, however, have the capacity to combust the full design capacity of 13,500 scfm. Please note that the Okeechobee Landfill is subject to 40 CFR 60, Subpart WWW, and Section 60.752(b)(2)(iii) requires all collected gas to be routed to a control system. So the design capacity must be present to flare all of the LFG in case the CTGs are off-line. This should not be interpreted that flares are required as backup devices for the CTGs, but instead as an alternate method of operation.

OLI does not agree with the Department’s assessment in the Final Determination (Department response to OLI comments on draft permit) that BACT requires enclosed combustion devices such as CTGs or enclosed flares. In the letter dated April 7, 2009, OLI explained to the Department why open flares are BACT for operation with CTGs

compared to enclosed flares. Open flares are favored over enclosed flares for operation with gas turbines and that is why OLI proposed the open flares.

- **Condition III.B.1** - OLI requests that the portions of the first sentence that state "to backup the CTG that will combust the LFG" and "with a continuous pilots and combustion chambers" be removed. A continuous pilot is not standard equipment for utility or enclosed flares. In situations where it has been used with utility flares, it is an operational problem. The continuous pilot typically uses landfill gas, and it is difficult to maintain adequate operating pressure of the landfill gas supply line for the continuous pilot to operate. The pilot needs about 8 inches of water column to insure operation. This will require an additional blower to maintain proper operating conditions. In addition, there will be a flame arrestor in this supply line, which will further decrease available pressure at the burner tip. The management of condensate within the LFG continuous pilot line also is a typical cause of malfunctions and adds additional capital and operating expenditures.

The continuous pilot will not provide additional advantages for the combustion of the landfill gas. The fail-safe valve will close in the event of flame out and that will in turn trigger the startup sequence of the flare.

The flares at the Okeechobee Landfill will have automatic startup/shutdown sequences that include the starting of the pilot flame which will use liquid propane as a fuel source. Therefore, the pilot flame will be automatically started whenever LFG is directed to the flare. The pilot flame will be extinguished once the main flame is confirmed as determined by the main flame thermocouple. The pilot will not be continuously operated.

- **Condition III.B.3** – OLI requests that the requirement to submit a flare shutdown plan be removed as it adds unnecessary burden on OLI. This construction permit already allows shutdown of the three existing flares (two 3,000-scfm enclosed flares and one 2,800-scfm open flare) and installation of the new open flares. This request will grant OLI greater flexibility regarding the construction of the project, i.e., deactivate the existing flares or install new ones in any order. Please note that there will always be sufficient flaring capacity available to combust all LFG, which is a Subpart WWW requirement. Even if all the new flares are constructed before the existing ones are deactivated, there will be no change in emissions because the LFG flow is not changing.

A flare shutdown plan was submitted to FDEP for approval in July, however; no approval has yet been granted. According to the permit, approval is required before flare construction can begin. It was OLI's understanding that the air permit should have been the approval for construction of the flares. It is unfair to hold OLI to another series of approvals to construct the flares that are already allowed in a newly issued air permit, potentially delaying the entire project. A copy of the previously submitted flare shutdown plan is attached (See Attachment C).

OLI will notify the Compliance Authority seven days before each existing flare is shut down and removed.

- **Condition III.B.5** – OLI requests that the operation restriction for the flares when the CTGs are unavailable be removed. To comply with the Subpart WWW requirements, the flares should be allowed to operate at any time, not just when the CTGs are unavailable. Please note that even when all CTGs are available, the total capacity of the CTGs is only 9,500 scfm of LFG compared to the landfill design capacity of 13,500 scfm. Therefore, the flares must be allowed to operate at all times to combust the excess LFG.

Please also note that once the LFG is treated (cleaned in the GDP), it should not matter whether the LFG is combusted in the CTGs or in the flares. Sulfur dioxide (SO₂) emissions are based on LFG flow and fuel sulfur content, so SO₂ emissions will not change. Nitrogen oxides (NO_x) and carbon monoxide (CO) emissions are less with the flares than with the CTGs operating, on a pound per million British thermal unit (lb/MMBtu) heat input basis. There will be less emissions when all flares are operating instead of all CTGs plus some flares operating. Therefore, please remove the second sentence starting with "However."

- **Condition III.B.10** – OLI requests that monitoring of flame temperature be removed from the condition. Monitoring of actual flame temperature in an open flare is not technically feasible and there are no examples of any permits requiring monitoring of flame temperature for an open flare. A heat sensing device such as an ultraviolet beam sensor or a thermocouple determines presence of a flame in an open flare. This is supported by 40 CFR 60.756(c), and Condition B.III.10 already has the requirement. Note that in an open flare, the flame and combustion occurs over the top of the flare stack and it is technically infeasible to place a temperature monitor there.
- **Condition III.B.11** – OLI requests that the requirement of visual inspection of flame presence be removed and the condition deleted. Based on Condition III.B.10, a heat sensing device such as an ultraviolet beam sensor or a thermocouple will indicate the continuous presence of a flame, which is also the 40 CFR 60, Subpart WWW, monitoring requirement of an open flare operation. This condition adds unnecessary inspection burden on OLI when the presence of the flame is already continuously monitored. Based on OLI research, no other landfill in Florida subject to Subpart WWW is required to perform visual inspection of flame presence. Additionally, there may only be staff on site from Monday thru Friday, and having to bring someone to the site to only perform a visual inspection of the flare on the weekend is not practical.
- **Condition III.B.13** – OLI requests that the monthly and quarterly inspection and monitoring requirements and the quarterly maintenance requirements be removed from the condition. The proposed open flares are subject to 40 CFR 60, Subpart WWW, which requires 98-percent control of NMOC [40 CFR 60.752(b)(iii)(B)]. The monitoring requirements of an open flare are contained in §60.756(c), which states the following:

(c) Each owner or operator seeking to comply with §60.752(b)(2)(iii) using an open flare shall install, calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

- (1) A heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.*
- (2) A device that records flow to or bypass of the flare. The owner or operator shall either:
 - (i) Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or*
 - (ii) Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.**

Therefore, there are no monthly or quarterly inspection or maintenance requirements according to the subpart. OLI proposes to calibrate, maintain, and operate the flare components according to manufacturer specifications. Additionally, there is no requirement in the regulation for the condensate pump which is cited as the reason for the condition.

Please consider the fact that a routine monthly inspection and monitoring and quarterly maintenance adds burden on OLI. Please also note as an example, the open flares at Waste Management's Central Landfill in Pompano Beach, Florida (Permit No. 0112094-005-AV) are subject to monitoring requirements to ensure that they are operated and maintained in conformance with the manufacturer design specification, but are not subject to any periodic inspection requirements.

- **Condition III.B.14** – The proposed flares will have an automatic system, which normally can re-start the flame. Therefore, a flare alarm or an auto dialer is not needed and OLI requests that the requirement to have an alarm or an auto dialer be removed. OLI believes that a specific response time should not be required. The facility will have a Startup/Shutdown/Malfunction (SSM) Plan in accordance with the requirements of NESHAP AAAA and will respond to malfunctions or emergencies accordingly. Please note that based on OLI research, no other landfill in Florida is subject to such a requirement.
- **Conditions III.B.15 and III.B.20** – OLI requests the word “stack” added before the word “test.”
- **Condition III.B.17** – Open flares burn LFG as open flames with a windshield to protect the flame from the wind. Open flares don't have combustion control through adjustment of the flow of air. The proposed open flares will be operated according to the manufacturer's operating instructions and by trained operators who are currently operating existing open flares at the site. Please remove the term “methods for minimizing excess emissions” from the last sentence. This is not needed since the flares will be operated according to the manufacturer specifications and if a problem arises, the open flares are shutdown to avoid any excess emissions. Please also remove the requirement that states “all operators and supervisors shall be properly trained to operate and ensure maintenance”. This condition suggests that all potential managers and landfill operators, regardless of their job description, must be trained to operate and maintain the flare.
- **Condition III.B.19** – OLI requests that the condition reference 40 CFR 63, Subpart AAAA, instead of Rule 62-4.070(3), F.A.C. The facility must have a written SSM plan per 40 CFR 63, Subpart AAAA.
- **Conditions III.C.3 and III.D.3** – Please note that the proposed turbines at the Okeechobee Landfill are not subject to 40 CFR 60, Subpart KKKK, Sections 60.4335 or 60.4345, as indicated in the condition. These subsections are applicable to turbines using water or steam injection to control NO_x emissions and that are equipped with CEMS to demonstrate compliance for NO_x.

The proposed Solar T-130 CTG is a 15-MW stationary combustion turbine with no water or steam injection. Similarly, the proposed Solar C-40 CTGs are 3.5-MW stationary combustion turbines with no water or steam injection. Therefore, these CTGs should be subject to the monitoring requirements contained in 40 CFR 60.4340, not in 40 CFR 60.4335. Section 60.4340 states that annual performance tests must be performed to demonstrate continuous compliance for NO_x. Section 60.4340 also states that a NO_x CEMS may be installed as an “alternative.”

OLI requests that the condition be removed. OLI is not aware of a NO_x CEMS being required on any gas turbine burning landfill gas. A CEMS may be justified on a large gas turbine located at a power plant, but not for a 15-MW or 3.5-MW turbine at a landfill.

OLI does not agree with the Department's assessment in the Final Determination (Department response to OLI comments on draft permit) that NO_x CEMS are required by the BACT determination, if not by the requirements of 40 CFR 60, Subpart KKKK. BACT determines emission control technology. A NO_x BACT analysis for the proposed CTG was submitted to the Department on April 7, 2009, which concluded that the only technically feasible control technology [selective catalytic reduction (SCR) system] is not

economically viable. The BACT for NO_x emissions from the proposed LFG-fired CTG was selected to be good combustion practices, which is inherent to the combustion process of the proposed CTs. Requiring NO_x CEMS based on BACT is, therefore, unreasonable.

- **Condition III.C.5** – OLI requests to change the term “maximum heat input” to “design heat input.” Note that the Department has already used the term “design heat input” in Condition III.D.5.
- **Conditions III.C.9 and III.D.9** – Since CEMS should not be required for the turbines, OLI requests to remove the CEMS-based emission standards from the table. OLI also requests to remove footnote “g” and revise footnote “c” to remove references to the NO_x CEMS. Remove footnote “e” reference to the requirement to have H₂S CEMS.
- **Conditions III.C.12 and III.D.12** – OLI requests that the conditions be removed as a CEMS should not be required for the proposed turbines.
- **Conditions III.C.17 and III.D.17** – OLI requests that the conditions be removed as a CEMS should not be required for the proposed turbines.

RULE APPLICABILITY

Under Federal and State of Florida PSD review requirements, all major new or modified sources of air pollutants regulated under the Clean Air Act (CAA) must be reviewed and a pre-construction permit issued. The U.S. Environmental Protection Agency (EPA) has approved Florida's State Implementation Plan (SIP), which contains PSD regulations. The applicable PSD rules in Florida are found at Rule 62-212.400, F.A.C.

A “major facility” is defined as any 1 of 28 named source categories that have the potential to emit 100 tons per year (TPY) or more, or any other stationary facility that has the potential to emit 250 TPY or more, of any pollutant regulated under the CAA. “Potential to emit” means the capability, at maximum design capacity, to emit a pollutant after the application of control equipment. Once a new source is determined to be a “major facility” for a particular pollutant, any pollutant emitted in amounts greater than the PSD significant emission rates is subject to PSD review. For an existing source for which a modification is proposed, the modification is subject to PSD review if the net increase in emissions for any CAA-regulated air pollutant due to the modification is greater than the PSD significant emission rates defined in 40 CFR 52.21(b)(23). If subject to PSD review, a PSD air construction permit is required for the project, which is required to undergo other analyses such as control technology review, air quality impact analysis, etc. If the net increase in emissions for any CAA-regulated air pollutant is smaller than the PSD significant emission rates, then a minor source air construction permit is required for the project.

The Okeechobee Landfill is a major facility under FDEP rules. Based on Rule 62-210.200(205), F.A.C., modification is defined as any physical change in, change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any pollutant subject to new source review regulation under the CAA. This permit application is to revise the permit conditions, which have no

effect on emissions. There will neither be any physical change, nor any increase in emissions. Therefore, the requested changes are not a modification as defined under the FDEP rules.

ATTACHMENT B
HYDROGEN SULFIDE MONITORING PROTOCOL

**BERMAN ROAD LANDFILL
OKEECHOBEE, FLORIDA**

**HYDROGEN SULFIDE MONITORING
PROTOCOL**

Prepared for:



Okeechobee Landfill, Inc.

Berman Road Landfill
10800 NE 128th Avenue
Okeechobee, Florida 34972
(863) 357-0111

Prepared by:

CEC

Carlson Environmental Consultants, PC
305 South Main Street
Monroe, NC 28112
(704) 283-9765

September 29, 2010

INTRODUCTION

Purpose

This document serves as a protocol for monitoring hydrogen sulfide concentrations in the landfill gas collected in the active landfill gas collection system at the Berman Road Landfill (also known as the Okeechobee Landfill) located near Okeechobee, Florida. The Berman Road Landfill (Landfill) is required to determine its hydrogen sulfide concentrations in the collected LFG on a daily basis for compliance with its air permits.

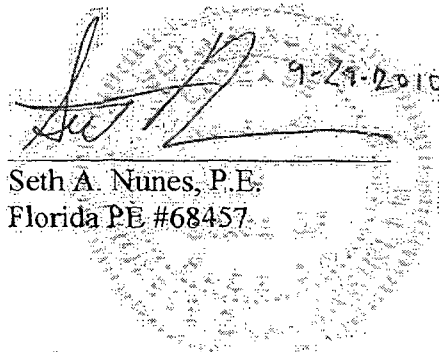
Applicability

This sampling protocol is applicable for the Berman Road Landfill only and is not applicable to other sites. Carlson Environmental Consultants, PC (CEC) relied upon our knowledge of the facility and information provided by Okeechobee Landfill, Inc. (OLI) to prepare this protocol.

Certification

This Hydrogen Sulfide Monitoring Protocol for the Berman Road Landfill has been prepared by CEC as authorized by OLI.

I certify that this protocol was prepared by me or under my direct supervision, and that I am a duly registered Professional Engineer under the laws of the State of Florida.


Seth A. Nunes, P.E.
Florida PE #68457

HYDROGEN SULFIDE SAMPLING PROTOCOL

The purpose of this protocol is to facilitate the daily hydrogen sulfide monitoring of the gas desulphurization plant (GDP) at OLI. The following test methods and procedures for hydrogen sulfide sampling shall be used to meet the Landfill's air permit requirements. The use of Drager tubes for Hydrogen Sulfide sampling on a daily basis allows for a consistent method of sampling to be used to ensure compliance with the outlet concentration limits at OLI.

Sampling Equipment

The following equipment (or equivalent) will be used on a daily basis:

- Drager Hand Pump – Model Accuro – SKC Item # 800-64000, or equivalent
- Hydrogen Sulfide Drager Tubes – 100 to 2000 ppmv range – SKC Item # 800-29101
- 3-Liter Tedlar Bag
- Plastic Tubing

Equipment Requirements

This sampling protocol assumes that the technician performing the monitoring has read and is familiar with all of the necessary manufacturer's information on the operation, care, and storage of the required equipment.

- All Hydrogen Sulfide Drager tubes shall be used only one time and disposed of after the data is recorded on the monitoring forms. All other sampling equipment may be utilized repeatedly until such time as the equipment needs repair or replacement.
- Each box of Hydrogen Sulfide Drager tubes is stamped with an expiration date. The tubes are suitable for use through the last day of the month of expiration. Tubes beyond the expiration date cannot be relied upon to give accurate results, and should not be used for sampling.
- The recommended operating and storage temperatures for the Drager hand pump are a minimum temperature of -4 deg F and a maximum temperature of 122 deg F. It is also recommended that the Drager hand pump be operated and stored in humidity less than 95%.
- Hydrogen Sulfide Drager tubes should be stored in their original package at room temperature. As noted on each package the maximum storage temperature is 77 deg

F. It is also recommended avoided excessively low (less than 35 deg F) or high (greater than 77 deg F) temperatures during storage to maintain accuracy of the tube indication.

- Do not subject the Hydrogen Sulfide Drager tubes to light for prolonged periods.

Calibration Procedure

Calibration of the Drager pump should be conducted once per week (every 7 calendar days). Completion of the calibration procedures should be documented in the "Notes" section of the monitoring form. The "pump leak test" is the calibration procedure to be conducted. To conduct the "pump leak test" the following steps should be followed:

1. Insert an unopened Hydrogen Sulfide Drager tube into the hand pump socket.
2. Squeeze the hand pump completely and release.
3. The hand pump is adequately leak-proof if the end-of-stroke indicator on the hand pump has not appeared after 15 minutes.
4. Remove the unopened Hydrogen Sulfide Drager tube from the hand pump socket.
5. Press the stroke counter reset button on the hand pump to reset the stroke counter to zero.

If the hand pump does not pass the "pump leak test", the manufacturer's recommendations for service and repair should be followed.

Monitoring Requirements

- This sampling protocol does not require special training or certifications to perform. The sampler(s) should be familiar with the Drager pump, Drager tubes, and Tedlar bags and have read all necessary manufacturers information on the operation, care, and storage of the above equipment.
- The sampler(s) should be familiar with all site-specific health and safety protocols and should be familiar and experienced with safe handling of landfill gas.
- Monitoring will be performed daily, which is defined as one time in every 24 hour period beginning at 12:00AM to 11:59PM, Monday to Saturday.
- Monitoring should not be conducted when the ambient temperatures are less than 32 deg F and greater than 104 deg F. Should the ambient air temperatures exceed these limits, a gas sample should be obtained in a Tedlar bag and transported to an alternate suitable area (i.e., inside maintenance shop, under shaded roof, etc.) to perform the Drager testing.

- A landfill gas sampling port located in the gas piping on the outlet of the gas blowers will be used to obtain the gas samples. The port will be designated by OLI and will be used for all hydrogen sulfide sampling for consistency.

Sampling Procedure

The following sampling procedure will be used to determine the hydrogen sulfide concentration in the landfill gas at the Berman Road Landfill on a daily basis.

1. A 3-liter Tedlar bag will be connected to the sample port with plastic tubing and allowed to fill with landfill gas from the gas piping. The bag will be filled to approximately 80% capacity. The bag will be disconnected from the sample port and deflated to flush the Tedlar bag. The flushing process will be performed twice. The filling process will be repeated a third time and the Tedlar bag valve will be closed to retain the third gas sample.
2. The Drager hand pump should be prepared with a new Hydrogen Sulfide Drager tube (100-2000 ppmv range). The tip of the Hydrogen Sulfide Drager tube will be opened using the tube opener on the hand pump. Both ends of the tube should be opened in the same way.
3. Insert the Hydrogen Sulfide Drager tube (now open at both ends) into the hand pump. The arrow must point towards the pump.
4. The Drager hand pump will be connected to the Tedlar bag and the valve on the Tedlar bag will be opened. The Drager hand pump will be depressed until it stops. The Drager hand pump will be released until its bellows are fully expanded. Only when the end-of-stroke indicator on the Drager hand pump appears can the pump be squeezed again. This process will be continued until the number on the stroke counter corresponds to the number of strokes indicated on the Hydrogen Sulfide Drager tubes (typically for Hydrogen Sulfide Drager tubes this is one (1) pump of the Drager hand pump).
5. The hydrogen sulfide concentration indicated by Hydrogen Sulfide Drager tube will be recorded on the monitoring form. Approximately 30 seconds should elapse after the sample is taken prior to recording the hydrogen sulfide concentration on the monitoring form.
6. The valve on the Tedlar bag should be closed, and the bag should be removed. The used Hydrogen Sulfide Drager tube should be removed from the socket of the Drager hand pump. The Drager hand pump should be flushed with a few pump strokes of clean air.
7. A new Hydrogen Sulfide Drager tube and the Tedlar bag will be reattached. A second Drager tube reading will be performed on the Tedlar bag sample following Steps 1 through 6 above, and the results recorded on the monitoring form.

8. The average of the two hydrogen sulfide concentrations recorded from the Drager tube readings will be calculated and recorded on the monitoring form as the Average Daily Hydrogen Sulfide Concentration.

Should the daily H₂S monitoring not be performed due to extreme meteorological conditions (i.e., hurricane, lightening storms, heat, etc), risk of personnel safety, Acts of War or Terrorism, or other reasonable event that would prevent a daily H₂S reading, the H₂S concentrations from the last day before and the next day after the missed day(s) shall be averaged and used for the missing daily H₂S concentrations.

Hydrogen Sulfide Daily Monitoring Form

The Hydrogen Sulfide Daily Monitoring Form required for completion on a daily basis as part of the sampling is attached. The form will be used to log the basic sampling data, including sampler name, sampling time, and the meteorological conditions at the time of sampling. Completed Hydrogen Sulfide Daily Monitoring Forms will be maintained at the Berman Road Landfill for a period of five (5) years. These completed forms will be available for review by regulatory officials upon request.

HYDROGEN SULFIDE DAILY MONITORING FORM
BERMAN ROAD LANDFILL - OKEECHOBEE, FLORIDA

Date: _____ Time: _____

Sampler Name(s): _____

Weather Conditions

General Conditions: _____

Wind Direction: _____ Wind Speed: _____

Temperature (°F): _____ Pressure: _____

H2S Sampling:

Sample 1 Concentration (ppmv): _____

Sample 2 Concentration (ppmv): _____

Average H2S Concentration (ppmv): _____

Notes:

ATTACHMENT C
FLARE SHUTDOWN PLAN



**CONESTOGA-ROVERS
& ASSOCIATES**

2055 Niagara Falls Blvd., Suite #3
Niagara Falls, NY 14304
Telephone: (716) 297-6150 Fax: (716) 297-2265
<http://www.craworld.com>

July 9, 2010

Reference No. 070269

Mr. Joseph Kahn
Division of Air Resource Management
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bob Martinez Center
2600 Blairstone Road
Tallahassee, FL 32399-2400

Dear Mr. Kahn:

Re: Okeechobee Landfill - Air Permit No. 0930104-014-AC
Flare Shutdown Plan

On behalf of Okeechobee Landfill, Inc., Conestoga-Rovers & Associates, Inc. (CRA) hereby submits the following Flare Shutdown Plan for the Okeechobee Landfill (Facility) located in Okeechobee, Florida. According to Section III, Subsection B, Condition 3 of Florida Department of Environmental Protection (FDEP) Air Permit No. 0930104-014-AC, the Facility is required to submit a flare shutdown plan to FDEP 90 days prior to commencement of construction on the new flares authorized by the permit. This document will detail the schedule of how the existing flares will be shutdown as the new flares are constructed. This document will describe the following:

- Shutdown procedures for each of the flares to be removed
- Tentative schedule for shutdown of each existing flare and construction of new flares
- Description of notification requirements to FDEP
- Sample notification document/ submittal

The final air construction air permit for the landfill gas-to-energy (LFGTE) project at the Okeechobee Landfill was issued on April 9, 2010. The new permit authorizes the installation of one 1,500 standard cubic feet per minute (scfm) open flare and four 3,000 scfm open flares that will serve as backup combustion units for the new LFGTE Facility. In addition, the two existing 3,000 scfm enclosed flares and one 2,800 scfm open flare will be deactivated and removed from operation.

In order to ensure the maximum landfill gas combustion capacity available during construction of the new open flares, the Facility proposes the following phases of construction:

Equal
Employment Opportunity
Employer

REGISTERED COMPANY FOR
ISO 9001
ENGINEERING DESIGN



**CONESTOGA-ROVERS
& ASSOCIATES**

July 9, 2010

2

Reference No. 070269

1. Two new 3,000 scfm open flares (Emission Unit (EU) ID Nos. 006 and 007) and one new 1,500 scfm open flares (EU ID No. 004A) will be installed and prepared for operation. Planned flare construction will commence in the third quarter of 2010 and the new flares should be operational by January 2011. During this construction period the currently existing flares will remain in operation.
2. The 3,000 scfm enclosed flare (EU ID No. 003) will be deactivated and shutdown. Shutdown will commence once the open flares (EU ID Nos. 004A, 006, and 007) are operational.
3. The 3,000 scfm enclosed flare (EU ID No. 005) will be deactivated and shutdown. Shutdown will commence once the open flares (EU ID Nos. 004A, 006, and 007) are operational.
4. The 2,800 scfm enclosed flare (EU ID No. 004) will be shutdown and prepared for relocation. Shutdown and relocation will commence once the open flares (EU ID Nos. 004A, 006, and 007) are operational.
5. As needed in the future, additional new 3,000 scfm flares will be installed (EU ID Nos. 008 and 009).

The performance test required under the New Source Performance Standards (NSPS) will be conducted within 180 days of startup for each of the open flares ((EU ID Nos. 004A, 006, and 007).

Once the new landfill gas handling system and new flares are operational, the existing flare systems will be taken off line and dismantled. Existing landfill gas header piping will be capped and sealed and/or taken out of service and removed according to procedures in the facility's existing landfill gas collection and control system design plan.

As described above, Okeechobee Landfill plans to install the new flares in the third quarter of 2010 and does not anticipate removal of the existing flares until early in 2011. CRA and/or Okeechobee Landfill will notify the FDEP in writing, 30-days prior to shutdown and removal of any existing flares. Provided as an attachment to this letter, is a sample notification document that will be prepared and submitted prior to shutdown and removal of the existing flares.



**CONESTOGA-ROVERS
& ASSOCIATES**

July 9, 2010

3

Reference No. 070269

We appreciate your time and consideration in this matter and would appreciate an expedited review. Please contact the undersigned at 716-297-6150 or Mr. Charles Orcutt of Okeechobee Landfill, Inc. at 863-357-0111 if you require further information or clarification.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

William Doebler, IV
Project Manager

WFD/cs/1

Attachment - Example Shutdown Letter

cc: C. Orcutt - Okeechobee Landfill, Inc.



**CONESTOGA-ROVERS
& ASSOCIATES**

2055 Niagara Falls Blvd., Suite #3
Niagara Falls, NY 14304
Telephone: (716) 297-6150 Fax: (716) 297-2265
<http://www.craworld.com>

Date, 2011

Reference No. XXXX

Mr. Joseph Kahn
Division of Air Resource Management
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bob Martinez Center
2600 Blairstone Road
Tallahassee, FL 32399-2400

Dear Mr. Kahn:

Re: Okeechobee Landfill - Air Permit No. 0930104-014-AC
Notification of Permanent Flare Shutdown

On behalf of Okeechobee Landfill, Inc., Conestoga-Rovers & Associates, Inc. (CRA) would like to notify the Florida Department of Environmental Protection (FDEP) that on Date , 2011 Okeechobee Landfill intends to cease operation of the scfm flare identified as EU ID 00x. This flare has been replaced by the newly constructed flare(s) , located at the new landfill gas handling system.

On/around the date above, Okeechobee Landfill will permanently turn off the flare, and begin dismantling of the flare and associated piping or equipment.

We appreciate your time and consideration in this matter. Please contact the undersigned at 716-297-6150 or Mr. Charles Orcutt of Okeechobee Landfill, Inc. at 863-357-0111 if you require further information or clarification.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

William Doebler, IV
Project Manager

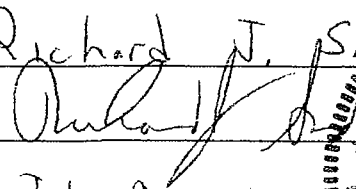
cc: C. Orcutt - Okeechobee Landfill, Inc.

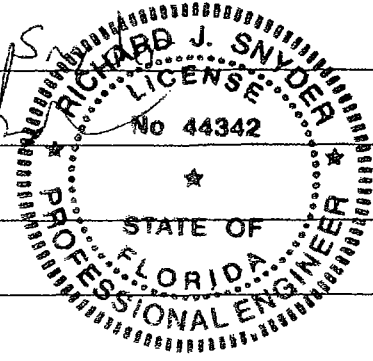
Equal
Employment Opportunity
Employer

REGISTERED COMPANY FOR
ISO 9001
ENGINEERING DESIGN

P.E. CERTIFICATION

I certify under penalty of law that I have personally examined, and am familiar with the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. This is defined as the performance of a professional service such as consultation, investigation, evaluation, planning, design or supervision of construction or operation in connection with any utilities, structures, buildings, machines, equipment, processes, works, or projects wherein the safeguarding of life, health and property is concerned, when such service or work requires the application of engineering principals and data. Based on my inquiry of those individuals with primary responsibility for obtaining such information, I certify that the statements and information are to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name of P.E.	<u>Richard J. Snyder</u>
Signature of P.E.	<u></u>
Date	<u>July 9, 2010</u>
License No.	<u>44342</u>
Phone	<u>732-225-0308</u>



At Golder Associates we strive to be the most respected global group of companies specializing in ground engineering and environmental services. Employee owned since our formation in 1960, we have created a unique culture with pride in ownership, resulting in long-term organizational stability. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees now operating from offices located throughout Africa, Asia, Australasia, Europe, North America and South America:

Africa	+ 27 11 254 4800
Asia	+ 852 2562 3658
Australasia	+ 61 3 8862 3500
Europe	+ 356 21 42 30 20
North America	+ 1 800 275 3281
South America	+ 55 21 3095 9500

solutions@golder.com
www.golder.com

Golder Associates Inc.
6026 NW 1st Place
Gainesville, FL 32607 USA
(352) 336-5600 - Phone
(352) 336-6603 - Fax

