



WASTE MANAGEMENT

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May 15 2008

RECEIVED

MAY 16 2008

BUREAU OF AIR REGULATION

A.A. Linero, P.E.
Program Administrator
Air Permitting South Section
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400
alvaro.linero@dep.state.fl.us

**RE: Addendum to Response to Comments, Florida Department of Environmental Protection
Letter Dated November 14, 2007 for Okeechobee Landfill
DEP file No. 0930104-AC, Application No. 1270-2**

Dear Mr. Linero:

On November 14, 2007, Waste Management Inc. of Florida received a request for information from the Florida Department of Environmental Protection (FDEP) in response to the permit application (DEP File Number 0930104-014-AC). An initial Response to Comments was submitted on February 7, 2008; however, we requested additional time to complete the CALPUFF protocol and modeling to respond to Comment A.1. This submittal completes our response to the FDEP's request for additional information.

Attached is the Shaw Environmental, Inc. response to Comment A.1. and two copies of the Class I Impact Analysis conducted in accordance with the Class I protocol and recommendations by the National Park Service. Please note that we have forwarded a copy of the Class I Impact Analysis to the National Park Service.

If there are further questions on the application, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Van Gessel', written over a white background.

John Van Gessel
Vice President and Assistant Secretary

Cc: Dee Morse, Environmental Protection Specialist, National Park Service: dee_morse@nps.gov
Debbie Nelson, FDEP, Deborah.Nelson@dep.state.fl.us
Kristin Alzheimer, P.E., Shaw Environmental: kristin.alzheimer@shawgrp.com
Kelly Fagan, Shaw Environmental: kelly.fagan@shawgrp.com
Jim Christiansen, Okeechobee Landfill, Inc.: jchristi@wm.com
David Thorley, Okeechobee Landfill, Inc.: dthorley@wm.com

Attachment

May 13, 2008

Mr. John Van Gessel
Vice President and Assistant Secretary
Waste Management of Florida
2859 West Paces Ferry Road, Suite 1600
Atlanta, GA 30339

**RE: Addendum to Response to Comments, Florida Department of Environmental Protection
Letter Dated November 14, 2007 for Okeechobee Landfill
DEP file No. 0930104-AC, Application No. 1270-2**

Dear Mr. Van Gessel:

We are pleased to present our follow-up to response to Florida Department of Environmental Protection's (FDEP) request for information received by Waste Management of Florida (WMF) on November 14, 2007. The FDEP's request is in regards to the air construction permit application (DEP File Number 0930104-014-AC). Below we have listed the remaining comment that required a follow-up response.

A. Air Quality Impact Analysis Items

November 14, 2007 Comment 1:

With regards to the Department's previous letter dated July 18, 2007, please submit the requested item A.1.

Further, the letter the Department received on October 16, states that the National Park Service (NPS) has not provided comments regarding the initial application. Class I modeling was not included in that submittal and the Department notified the Park Service that the application was incomplete with regards to many issues. The Department notified the NPS that the Department would inform them upon completion of the modeling so they may perform their review. Regardless, the NPS has provided comments regarding the need for the "interim" modeling and sensitive Class II modeling, which has been forwarded to Shaw Environmental, Inc. If comments from the Park Service regarding procedure are required, the NPS frequently recommends that applicants with procedural issues prepare a modeling protocol for their review.

Response: Item A.1. from the July 18, 2007 letter requested the following analysis be submitted: **Class I Prevention of Significant Deterioration (PSD) Significant Impact Analysis, PSD Increment Analysis (if required) and an Air Quality Related Values (AQRV) analysis for the proposed expansion for all operating scenarios, including the "Interim" period. Further, Comment A.1 stated that the "Interim" period (prior to installation of controls) is subject to PSD review. Comment A.1. in the July 18th letter also requested that the Class I analysis include the Class II areas, Big Cypress National Preserve and Biscayne National Park.**

As requesting in the November 14, 2007 letter, the Class I Significant Impact and AQRV Analyses protocol for the interim and BACT scenarios was submitted to

your department for your and the NPS's review on January 2, 2008. Subsequently, Shaw and WMF met with the NPS on March 6, 2008 to review the protocol. On March 18, 2008 the NPS provided several recommendations to the Class I protocol.

The Class I Impact Analysis conducted in accordance with the protocol and recommendations from the NPS is attached.

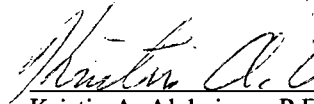
If there are further questions on the application, please contact the Kelly Fagan at 508-497-6172.

Sincerely,

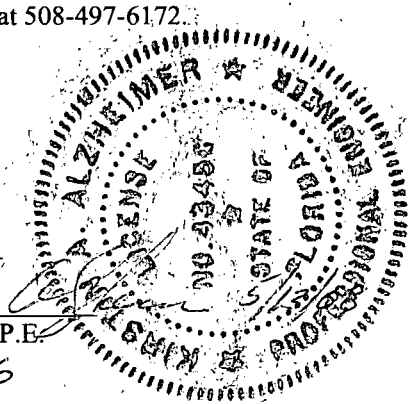


Kelly Fagan
Client Program Manager

Seal



Kristin A. Alzheimer, P.E.
PE # 43456



Cc: David Thorley, Okeechobee Landfill, Inc.: dthorley@wm.com
Jim Christiansen, Okeechobee Landfill, Inc.: jchristi@wm.com
Seth Nunes, Okeechobee Landfill, Inc.: snunes@wm.com
Arijit Pakrasi, Shaw Environmental: arijit.pakrasi@shawgrp.com
Kelly Fagan, Shaw Environmental: kelly.fagan@shawgrp.com
Leah Blinn, Shaw Environmental: leah.blinn@shawgrp.com

Attachment

Heron, Teresa

From: Linero, Alvaro
Sent: Wednesday, July 02, 2008 10:36 AM
To: Read, David; Heron, Teresa
Subject: FW: Review of Long Form, Facility 0930104, Application 1270-2
Attachments: Revisions to long form.pdf

Teresa:

Do you have a physical application or is it actually in EPSAP.

Please put these pages somewhere or maybe update the EPSAP to reflect the changes.

Let's decide whether this submittal restarts the clock.

Update ARMS if needed.

Thanks.

Al.

From: Fagan, Kelly [mailto:Kelly.Fagan@shawgrp.com]
Sent: Friday, June 27, 2008 11:58 AM
To: Nelson, Deborah; Linero, Alvaro
Cc: dthorley@wm.com; jchristi@wm.com; JVanGessel@wm.com; Alzheimer, Kristin; Blinn, Leah; Pakrasi, Arijit
Subject: Review of Long Form, Facility 0930104, Application 1270-2

Dear Debbie and Al,

Per Debbie's suggestion, we reviewed the Long Form submitted under EPSAP on February 28, 2007, to determine if any of the air quality impact analysis changes had effected the information in the form. The most recent submittal was related to the interim scenario which is not address in the information required in the Form. However, during the review, Shaw noted two entries that should be revised. We have attached the Long Form pages with the requested changes.

The first change is on page 19 of 122; we have entered the incorrect the exit temperature. The temperature should be revised from 778F which was based on a 50% load to 894F, based on the 100% load. All other entries are correct.

The second requested change is on page 23 of 122. We request that Item 3, Potential Emissions, be revised from 329.5 lb/hr and 1442 tons per year to 366 lb/hr and 1618 tons per year, respectively. The requested revision is based on the alternative scenario where the two existing enclosed flares are replaced with open flares.

Thank you both for your time and suggestion. If additional information or questions are required, please let me know.

Sincerely,

Kelly

Kelly Fagan
Client Program Manager
Shaw Environmental & Infrastructure, Inc.

7/18/2008

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508-435-3685 (fax)

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The Shaw Group Inc. <http://www.shawgrp.com>



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

December 11, 2008

Electronically Sent – Received Receipt Requested

jvangessel@wm.com

Mr. John Van Gessel
Vice President & Assistant Secretary
Waste Management, Inc. of Florida
2869 West Paces Ferry Road
Atlanta, Georgia 30339

Re: DEP File No. 0930104-014-AC
Berman Road and Clay Farms Landfills
Okeechobee Landfill, Inc.
Waste Management, Inc. of Florida

Dear Mr. Van Gessel:

On November 12, 2008 the Department received the revised air construction permit application for the construction of additional flares and turbines along with the Low Cat desulfurization system at the Berman Road and Clay Farms Landfills.

Pursuant to Rules 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information prior to processing the application. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The application states (page 11, Section 5.2 of the PSD report) that the best available control technology (BACT) section has not been revised. The Department acknowledges that there is no need to review the BACT analyses referring to the LoCat desulphurization system. However, the BACT for the new proposed turbines needs to be addressed. Appendix B of the application lists for the primary operating scenario potential emissions of nitrogen oxides (NO_x) emissions in the order of 765.3 tons per year (TPY), sulfur dioxide (SO₂) 574.8 TPY, and carbon monoxide emissions in the order of 5,042 TPY. The individual emission rates for NO_x are 72 parts per million, by volume (ppmv) for the Titan and 42 ppmv for the Centaur. CO is listed as 100 ppmv for the Titan and 250 ppmv for the Centaur.

The Department needs a description as to what system of continuous emissions reduction is planned and a best available control technology (BACT) proposal in accordance with Rule 62-210.200, Definitions, F.A.C and Rule 62-210.400(4)(c) Prevention of Significant Deterioration (PSD), F.A.C.

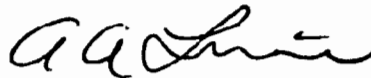
2. Section 2.4 of the addendum to the application states that for modeling purposes, more recent and averaged H₂S data were used. Please provide the time period of the data used in the modeling. Also, please explain how the new data was averaged.

3. Section 4.3.1 of the addendum to the application explains the receptor grid for the Ambient Air Quality Standard (AAQS) and Increment analyses. Please clarify or verify that a 50 km buffer was used for all analyses and that no further than 100 meter spacing of receptors were used where higher concentrations were found. Please also verify that a 50 km fence-line grid was used for the Significant Impact Analysis for PM₁₀.
4. With regards to Appendix B on disk, please explain why there are different inventories for scenario 2B and scenario 2. Also, please explain the following with regards to the excel spreadsheets: what do the terms "Deleted - Duplicate Entry" and "Deleted -No Emission Information" mean, why is the Berman Road Landfill on the NO_x list for "Deleted - No Emission Information," why do the tables show blank cells in the column for whether the source is within the Significant Impact Area, and why all of the sources inside the impact area are not shown whether or not they were modeled in the adjacent column.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): "The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."

We will forward any comments from EPA Region IV and the National Park Service as soon as they are received. If you have any questions regarding this matter, please contact Ms. Teresa Heron at 850/921-9529 or Ms. Debbie Nelson (meteorologist) at 850/921-9537.

Sincerely,



A.A. Linero, Program Administrator
Special Projects Section

AAL/th/dn

cc: David Thorley, Waste Management, Inc. dthorley@wm.com
Seth Nunes, Waste Management, Inc. snunes1@wm.com
Jim Christiansen, Waste Management, Inc. jchristi@wm.com
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