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West Palm Beach, Florida 33406
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MAY 02 2003

BUREAU OF AIR REGULATION

April 25, 2003

Mr. Isaac Santos
Emissions Monitoring Section
Bureau of Air Monitoring and Mobile Sources
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Solid Waste Authority of Palm Beach County
North County Resource Recovery Facility
Class I Landfill
FDEP Facility No. 0990234
Request to Decommission Non-Performing Gas Collection Wells

Dear Mr. Santos:

CDM, acting on behalf of the Solid Waste Authority of Palm Beach County (SWA), is in receipt of your letter dated February 28, 2003, regarding our request for decommissioning of certain landfill gas (LFG) system collection wells at SWA Class I Landfill.

In our letter dated January 23, 2003, we requested that certain LFG wells be decommissioned if they met all four of the following criteria:

- Location in an area of non-degradable waste;
- Low, or no flow;
- Low, or no concentration of methane;
- These conditions are due to lack of gas being generated in the area, rather than to a condition of screen clogging or leakage, which can be repaired.

You pointed out in your February 28th letter that many wells in the Class I Landfill exhibit one or more of these criteria. It is SWA's intent, at this time, to request that only Wells 25, 31, 38 and 51 be disconnected from the collection system, because they currently meet all four of these criteria. SWA would like to exempt these four wells currently, as well as develop a process under which other wells that meet these four criteria could be decommissioned in the future.



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April 25, 2003
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SWA has recently begun a program of repair, reconstruction, and expansion of the Class I Landfill gas collection system. The program is aimed at increasing the efficiency of the system, eliminating many of the system deficiencies (such as low flow in some of the wells), and expanding the system into the newest areas of the landfill. During this program, all wells will be evaluated and repairs made where necessary.

SWA believes that Wells 25, 31, 38, and 51 are in areas containing almost entirely ash, and cannot be made to be productive, because little or no gas is being generated in their vicinity. You stated in your February 28th letter that: "Pursuant to 40 CFR 60.759(a)(3)(ii) 'any nonproductive area of the landfill may be excluded from control provided that the total of excluded areas can be shown to contribute less than one percent of the total amount of NMOC emissions from the landfill.' SWA needs to provide a report that demonstrates that the above requirement is met."

SWA is committed to maintaining environmental compliance for its landfill gas collection system and will provide the report requested by the Department. SWA will conduct sampling of the landfill gas in each of these wells proposed to be decommissioned, and at the inlet to the flare, to determine NMOC concentrations in accordance with Method 25C. This information, along with information on the amount and age of degradable waste in the zone of influence of each well, and in the landfill as a whole, will be used in the LANDGEM model to determine if the total NMOC generation rate from the areas proposed to be excluded would contribute less than one percent of the Landfill's total NMOC generation rate. SWA will present this information in the report to the Department, as you have requested. SWA understands that these wells cannot be decommissioned until the Department has reviewed and approved this report, its methodology and its findings. If you have any questions or comments, please do not hesitate to contact me at our office.

Very truly yours,

A handwritten signature in black ink that reads "Kevin C. Leo".

Kevin C. Leo, P.E.
Camp Dresser & McKee Inc.

cc: Tom Tittle, FDEP SE District
Laxmana Tallam, FDEP SE District
Scott Sheplak, FDEP Tallahassee
Marc Bruner, Ph.D., SWA
Bob Worobel, SWA



YOUR PARTNER FOR
SOLID WASTE SOLUTIONS

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APR 21 2003

BUREAU OF AIR REGULATION

April 16, 2003

Mr. Scott M. Sheplak
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road MS 5505
Tallahassee, Fl 32399-2400

**Re: Responsible Official Notification Form – Change in Responsible Official
Title V Air Permit No.: 0990234-001-AV
North County Resource Recovery Facility**

Dear Scott:

Enclosed you will find a Responsible Official Form DEP 62-213.900(8) which designates a change in the Responsible Official for the North County Resource Recovery Facility. Mr. Donald L. Lockhart has retired, and on April 15, 2003 Mr. John D. Booth became the new executive director for the Authority. The additional responsible officials, Mark Hammond and Marc Bruner, that were previously identified are still in effect.

If you have any questions or need any additional information, please contact me at (561) 640-4000 ext. 4613.

Sincerely,

Mary Beth Morrison
Environmental Compliance Coordinator

cc: Tom Tittle, FDEP-SE District
Laxmana Tallam, FDEP-SE District
Marc Bruner, SWA
Mark McLean, SWA



Department of Environmental Protection

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Division of Air Resource Management

APR 21 2003

RESPONSIBLE OFFICIAL NOTIFICATION FORM

BUREAU OF AIR REGULATION

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

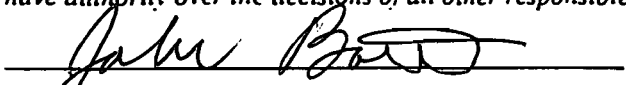
Identification of Facility

1. Facility Owner/Company Name: Solid Waste Authority of Palm Beach County	
2. Site Name: North County Ressource Recovery Facility	3. County: Palm Beach
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 0990234-001-AV	

Notification Type (Check one or more)

<input type="checkbox"/>	INITIAL:	Notification of responsible officials for an initial Title V application.
<input type="checkbox"/>	RENEWAL:	Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/>	CHANGE:	Notification of change in responsible official(s). New Executive Director Effective date of change in responsible official(s) <u>April 15, 2003</u>

Primary Responsible Official

1. Name and Position Title of Responsible Official: John Booth, Executive Director	
2. Responsible Official Mailing Address: Organization/Firm: Solid Waste Authority Street Address: 7501 North Jog Road City: West Palm Beach State: FL Zip Code: 33412	
3. Responsible Official Telephone Numbers: Telephone: (561) 640-4000 Fax: (561) 640-3400	
4. 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 checked="" 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.	
5. Responsible Official Statement: I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting. <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;">  <hr/> Signature </div> <div style="text-align: center;"> <u>4/16/03</u> <hr/> Date </div> </div>	

Additional Responsible Official

1. Name and Position Title of Responsible Official: Mark Hammond, Managing Director
2. Responsible Official Mailing Address: Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 N. Jog Road City: West Palm Beach State: FL Zip Code: 33412
3. Responsible Official Telephone Numbers: Telephone: (561) 640-4000 ext. 4215 Fax: (561) 640-3400
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <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 checked="" 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.

Additional Responsible Official

1. Name and Position Title of Responsible Official: Marc Bruner, Director of Planning & Environmental Programs
2. Responsible Official Mailing Address: Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 North Jog Road City: West Palm Beach State: FL Zip Code: 33412
3. Responsible Official Telephone Numbers: Telephone: (561) 640-4000 Fax: (561) 640-3400
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <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 checked="" 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.