From: Dawson, John
To: "dcooper@scsengineers.com"
Subject: Citrus Landfill permit question
Date: Thursday, October 09, 2014 10:54:00 AM

Dear Dan,

I'm writing regarding the operating permit revision for the Citrus County Central Landfill. I have a couple questions regarding the engines in their permit and in their revision application.

- The application has the brake horsepower for the existing Caterpillar generator as 269 hp, with a construction year of 2001, but the current version of the operating permit has the Caterpillar generator as having brake horsepower as 123.5, with a construction year of 1997. Could you clarify? (I don't think this would affect any requirements in the permit, but I'd like to make sure I have the right information in the permit.)
- The application and the existing permit refer to "limited use" engines – however, this is not a category that exists for these types of engines under EPA NESHAP or NSPS rules. The distinction we need to make is between "emergency" and "non-emergency." From the previous permit, I see that the engines that were all previously permitted were classified as either "emergency" or "limited." The engine that was classified as "emergency" can stay that way. What I'm trying to figure out is if the ones classified as "limited" should actually be "emergency" or "non-emergency". These are the criteria for determining if something is an "emergency" engine, from EPA (http://www.epa.gov/region1/rice/):

    - Unlimited use for emergencies (e.g., power outage, fire, flood)
    - Emergency engines may operate for 100 hr/yr for any combination of the following:
        - maintenance/testing;
        - emergency demand response (in situations when a blackout is imminent – either the reliability coordinator has declared an Energy Emergency Alert Level 2 as defined in the North American Reliability Corporation (NERC) Reliability Standard; or there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency);
        - 50 hr/yr of the 100 hr/yr allocation can be used for:
            - non-emergency situations if no financial arrangement *(This would be the main category for us to think about in this case)*
            - local reliability as part of a financial arrangement with another entity if specific criteria met (existing RICE at area sources of HAP only)

I think there's probably a good chance we can classify those "limited use" engines as "emergency", but we'd need to check on the desired hours of operation first.

Please feel free to give me a call if you have any questions.

Thanks,
John Dawson

John P. Dawson, Ph.D.
Florida Department of Environmental Protection

Division of Air Resource Management
(850) 717-9085
John.Dawson@dep.state.fl.us