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**DIVISION OF AIR
RESOURCE MANAGEMENT**

December 3, 2013

Mr. Syed Arif, Air Program Administrator
State of Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Columbia County Winfield Landfill

Dear Mr. Arif,

Thank you for your call and opportunity to discuss the proposed draft permit conditions, as we discussed Columbia County does not object to the installation of the Gas collection system at time specific time in the future, given the fact that this needs to be done and as soon as the existing cells 1, 2, and 3 reach desired height. We will install the collection system within the next 36 months.

We however do object to installation of any treatment system until after it is proven that the actual NMOC emissions exceed 50 micrograms.

While the result of the generic model shows this landfill may exceed the NMOC limitation of 50 micrograms, we highly doubt that this in reality, will occur anytime soon given the low volume of waste disposed of at this landfill. In fact at this and other similar low volume landfill spaces are occupied with daily solid cover than actual waste, so the NMOC gas generation is minimal.

Please proceed with the permit issuance with NMOC collection and treatment only upon demonstration that actual Emissions and not based on generic model output.

As always please, feel free to contact me should you have any question or concerns.

Sincerely,

Frank Darabi, P.E.
President

Ed Lontz
Kevin Kirby



