



Board of County Commissioners • Escambia County, Florida

Patrick T. Johnson, Director
Solid Waste Management

December 18, 2013

Mr. Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management
State of Florida
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Perdido Landfill
Letter Request for Administrative Correction
Title V Air Operation Permit 0330246-008-AV

Mr. Koerner:

The purpose of this letter is to request several minor administrative corrections to the recently issued Title V Operation Permit 0330246-008-AV. Please consider removing condition A.22 from the permit as it appeared in Permit 0330246-006-AV and was previously satisfied. Also we would like to request a modification to the semi-annual monitoring report submittal timeline. We submitted the most recent semiannual report for the Perdido Landfill on June 28, 2013. For the future we would like to propose postmark due dates of July 31st (January-June) and January 31st (July-December) for the semi-annual reporting; with the next report due January 31, 2014. For your convenience here are the appropriate references for adjustments to the time periods:

40 CFR 60.19(f)(3): "If, in the Administrator's judgment, an owner or operator's request for an adjustment to a particular time period or postmark deadline is warranted, the Administrator will approve the adjustment.

40 CFR 63.10(a)(5): "The Administrator will notify the owner or operator in writing of approval or disapproval of the request for an adjustment within 15 calendar days of receiving sufficient information to evaluate the request." If an owner or operator of an affected source in a State with delegated authority is required to submit periodic reports under this part to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such source under this part, the owner or operator may change the dates by which periodic reports under this part shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. For each relevant standard established pursuant to section 112 of the Act, the allowance in the previous sentence applies in each State beginning 1 year after the affected source's compliance date for that standard. Procedures governing the implementation of this provision are specified in §63.9(i)."

Please let me know if these requests are acceptable. If you have any questions or comments on this matter please contact me at 850.937.2160.

Sincerely,

Brent Schneider, P.E.
Manager, Engineering & Environmental Quality

cc: Andrew Joslyn, FDEP
Leigh Pell, FDEP
Patrick Johnson, Escambia County

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