



October 29, 2013

Syed Arif
Environmental Administrator
Florida Department of Environmental Protection
Office of Permitting and Compliance
Division of Air Resource Management
2600 Blair Stone Road
MS 5500
Tallahassee, Florida 32399

RECEIVED
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DIVISION OF AIR
RESOURCE MANAGEMENT

RE: New River Regional Landfill Title V Renewal Application
Response to FDEP Request for Additional Information
FDEP File No.: 1250008-007-AV
Jones Edmunds Project No.: 14040-046-01

Dear Mr. Arif:

This letter is provided in response to your August 20, 2013, Florida Department of Environmental Protection (FDEP) Request for Additional Information. Each FDEP comment is presented below in *italics* followed by our response in **bold**.

Comment 1: Insignificant Emissions Units. The application lists numerous engines as insignificant emissions units. Please specify if any of these emissions units are subject to 40 CFR 60 Subpart IIII, Standards of performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, or 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines.

Response 1: Table 1 lists emissions units that are subject to 40 CFR 60 Subpart IIII, Standards of performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, or 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines.

Table 1 Engine Emissions Units Subject to Subpart III, JJJJ, or ZZZZ		
Description	Relevant Subpart	RICE Type
Stationary RICE Emergency Generators: <ul style="list-style-type: none"> • Generac 60 KW Diesel Generator (office) • Olympian Diesel Generator – flare 	40 CFR 63 Subpart ZZZZ	Existing Stationary Emergency Compression Ignition

Table 2 lists emissions units that are not subject to 40 CFR 60 Subpart III, Standards of performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, or 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines.

Table 2 Engine Emissions Units Not Subject to Subpart III, JJJJ, or ZZZZ		
Description	Relevant Subpart	RICE Type
<ul style="list-style-type: none"> • Honda Gas Generator-5346540 • Perkins/Wacker 02 Godwin Pump W/Trailer • Onan Generator Floodlight Set • John Deere 6-inch Godwin Dri-Prime PumpSet • CAT Peterson Grinder w/CAT Engine 	N/A	Non-Stationary

Table 3 lists emissions units that have been removed from service.

Table 3 Engine Emissions Units Removed from Service		
Description	Relevant Subpart	RICE Type
<ul style="list-style-type: none"> • Cummins 71 Fermont Diesel Generator • Perkins/Wacker Generator, Portable • Morbark Chipper Mulcher • Honda/Husqvana 13HP-6500W Generator 	N/A	Removed from Service

Comment 1a: If applicable, please specify how the facility is complying with the applicable subpart(s).

Response 1a: Attachment 1 lists the compliance activities performed by NRSWA. NRSWA includes a statement in the semiannual compliance report that all operation and maintenance requirements described in 40 CFR 63 Subpart ZZZZ were met for each emergency generator described in

Response 1. Recordkeeping of operating hours and maintenance is done in accordance with 40 CFR 63 Subpart ZZZZ. No notification and reporting requirements are necessary for these engines unless they operate outside the operation and maintenance requirements listed in 40 CFR 63 Subpart ZZZZ.

Comment 1b: If applicable, please provide the following information for each engine:

1. *What type of fuel does the engine use (include sulfur content)?*
2. *What type of engine do you have? (ex. Compression ignition or diesel (CI), spark ignition (SI), four stroke spark ignition that is lean burn (4SLB), two stroke lean burn (2SLB), dual (natural gas plus diesel) fired or landfill gas fired.)*
3. *What is the HP (Hint: 1 HP = 0.7456 KW) of the stationary engine?*
4. *Is the engine a stationary engine and therefore subject to the RICE requirements in the NESHAP or the NSPS? By contrast, a mobile (or relocatable) source engine could be a temporary replacement unit and located at a stationary source for less than 1 year and has been properly certified (with an engine label) as meeting the standards that would be applicable to such engine under the appropriate non-road engine provisions.*
5. *Has the engine been refurbished/reconstructed? Upon reconstruction, an existing engine becomes subject to the relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source; therefore, has the engine ever had components replaced to such an extent that:*
 - (a) *The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and*
 - (b) *It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act.*
6. *What is the date of manufacture of the engine (year and month, if possible)? Note: Reconstructed engines are assigned a new date of manufacture if the fixed capital cost of the new and refurbished components exceeds 75 percent of the fixed capital cost of a comparable entirely new facility.*
7. *Is the engine EPA Certified and labeled (what Tier of emission standards does the engine meet, if any)?*

8. *When did you commence construction (date the engine was ordered) or reconstruction on your stationary engine (month, day and year)?*
9. *What is the engine displacement (liters per cylinder)?*
10. *Does the engine use an oxidation catalyst, diesel particulate filter (DPF), or selective catalytic reduction (SCR) (specify any controls employed)?*
11. *Does the engine have a continuous emissions monitoring system (CEMS) for any pollutants or a continuous parameter monitoring system (CPMS)?*
12. *What are the total hours of operation per year for the engine (estimate or based on historical)?*
13. *How many of the total hours are during an emergency situation (estimate or historical)?*
14. *How many of the total hours, if any, are part of the demand response program (if applicable)?*
15. *Is the engine used for peak shaving, to generate income for a facility to supply power to an electrical grid, or supply power as a part of a financial arrangement with another entity (state if future operation will include these modes of operation)?*
16. *For Fire Pumps: Is the engine part of a fire pump and was the engine manufactured as a certified National Fire Protection "Association (NFPA) engine after July 1, 2006? Is the engine a high speed engine (operation rated at or above 2,650 rpm)?*

Response 1b: Attachment 2 provides the requested information for each stationary engine subject to 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines shown in Table 1.

Comment 2: Responsible Official (R.O.) Certification Statement. Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

Response 2: Attachment 3 provides a new RO certification statement page from FDEP Form No. 62-210.900(1), effective March 16, 2008.


Comment 3: Professional Engineer (P.E.) Certification Statement. 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. If your responses to

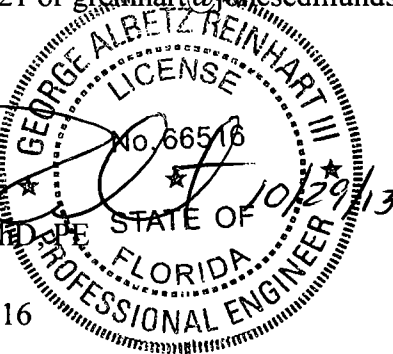
the items above result in changes or include new calculations, please complete and submit a new P.E. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 11, 2010.

Response 3: Attachment 4 provides a new PE certification statement page from FDEP Form No. 62-210.900(1), effective March 11, 2010.

If you have any questions or need clarification regarding the enclosed information, please contact me at (352) 377-5821 or greinhart@jonesedmunds.com.

Sincerely,


George Reinhart, PhD, PE
Project Manager
Florida PE No. 66516



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Enclosures/Attachments

Xc: Perry Kent, NRRL

ATTACHMENT 1

COMPLIANCE ACTIVITIES PERFORMED BY NRSWA

**New River Solid Waste Association
New River Regional Landfill**

40 CFR Subpart ZZZZ RICE Requirements

**Mitsubishi - Generac Diesel Generator (office)
Emergency RICE Engine**

Maintenance Requirement	Frequency	Meter Reading	Date Performed	Performed By
Change oil and filter	Every 500 hours of operation or annually, whichever comes first			
Inspect air cleaner	Every 1,000 hours of operation or annually, whichever comes first			
Inspect all hoses and belts; replace as necessary	Every 500 hours of operation or annually, whichever comes first,			

Additional Maintenance and Operational Requirements and Limitations	Reference
Must be within operation and emission limitations at all times.	63.6605(a)
Must operate in a manner consistent with safety and good air pollution control practices for minimizing emissions.	63.6605(b)
Must operate and maintain according to manufacturer's emission-related written instructions or develop your own maintenance plan written which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent wi	63.6625(e) 63.6640(a) Table 6, Line 9
Minimize engine's time spent at idle during startup to that needed for appropriate and safe loading, not to exceed 30 minutes.	63.6625(h)
May utilize an oil analysis program to extend oil change interval (see rule for more detail).	63.6625(i)

Emergency Engine Operational Time Restriction (to maintain emergency classification)	Reference
No time limit for use in emergency situations.	63.6640(f)(1)(i)
May not operate in non-emergency situation for 50 hours per year without losing emergency status.	63.6640(f)(1)
May operate for purposes of maintenance checks and readiness testing if recommended by Federal, State or local governments, the manufacturer, the vendor or the insurance company associated with the engine. Maintenance checks and readiness testing is othe	63.6640(f)(1)(ii)
May operate for up to 50 hours per year in non-emergency situations, but those hours count towards the 100 provided for maintenance and testing. These hours cannot be used for peak shaving or to generate income. See additional stipulations if necessary.	63.6640(f)(1)(iii)

Record-Keeping Requirement	Reference
Keep copy of each notification and report submitted to comply with this subpart.	63.6655(a)(1)
Records of the occurrence and duration of each malfunction of operation or associated air pollution control and monitoring equipment.	63.6655(a)(2)
Records of all required maintenance performed on air pollution control and monitoring equipment.	63.6655(a)(4)
Records of actions taken during malfunction to minimize emissions in accordance with 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.	63.6655(a)(5)
Keep records showing continuous compliance with each operating limitation that applies.	63.6655(d)
Keep maintenance records to show compliance with your maintenance plan	63.6655(e)
Records must be readily available for expeditious review with at least the most recent 2 years of data stored on site (the remaining 3 years	63.6660(a)
Must keep each record for any occurrence, measurement, maintenance, corrective action, report or record for 5 years following the event (may be stored off site).	63.6660(b)
Must keep each records readily accessible in hard copy or electronic	63.6660(c)

**New River Solid Waste Association
New River Regional Landfill**

40 CFR Subpart ZZZZ RICE Requirements

**Olympian Diesel Generator (at 2400 scfm flare)
Emergency RICE Engine**

Maintenance Requirement	Frequency	Meter Reading	Date Performed	Performed By
Change oil and filter	Every 500 hours of operation or annually, whichever comes first			
Inspect air cleaner	Every 1,000 hours of operation or annually, whichever comes first			
Inspect all hoses and belts; replace as necessary	Every 500 hours of operation or annually, whichever comes first,			

Additional Maintenance and Operational Requirements and Limitations	Reference
Must be within operation and emission limitations at all times.	63.6605(a)
Must operate in a manner consistent with safety and good air pollution control practices for minimizing emissions.	63.6605(b)
Must operate and maintain according to manufacturer's emission-related written instructions or develop your own maintenance plan written which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.	63.6625(e) 63.6640(a) Table 6, Line 9
Minimize engine's time spent at idle during startup to that needed for appropriate and safe loading, not to exceed 30 minutes.	63.6625(h)
May utilize an oil analysis program to extend oil change interval (see rule for more detail).	63.6625(i)

Emergency Engine Operational Time Restriction (to maintain emergency classification)	Reference
No time limit for use in emergency situations.	63.6640(f)(1)(i)
May not operate in non-emergency situation for 50 hours per year without losing emergency status.	63.6640(f)(1)
May operate for purposes of maintenance checks and readiness testing if recommended by Federal, State or local governments, the manufacturer, the vendor or the insurance company associated with the engine. Maintenance checks and readiness testing is othe	63.6640(f)(1)(ii)
May operate for up to 50 hours per year in non-emergency situations, but those hours count towards the 100 provided for maintenance and testing. These hours cannot be used for peak shaving or to generate income. See additional stipulations if necessary.	63.6640(f)(1)(iii)

Record-Keeping Requirement	Reference
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Records of the occurrence and duration of each malfunction of operation or associated air pollution control and monitoring equipment.	63.6655(a)(2)
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Records must be readily available for expeditious review with at least the most recent 2 years of data stored on site (the remaining 3 years	63.6660(a)
Must keep each record for any occurrence, measurement, maintenance, corrective action, report or record for 5 years following the event (may be stored off site).	63.6660(b)
Must keep each records readily accessible in hard copy or electronic	63.6660(c)

ATTACHMENT 2
ENGINE EMISSIONS

New River Regional Landfill

Response Item	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16					
Engine Make	Description	Fuel Type	Sulfur Content (ppm)	Ignition Type	HP	Stationary Engine	Refurbished	Date of Manufacture	EPA Certified and Labeled	Date Aquired On Site	Displacement	Controls	Continuous Monitoring System	Total Hours of Operation (Historic)	Emergency Hours of Operation (Historic)	Demand Response Hours of Operation	Peak Shaving/Income	Fire Pumps	RICE Type	Subpart	
Emergency Generators																					
Mitsubishi/Generac	60 KW Diesel Generator - Office	Diesel	15	CI	60	Yes	No	9/2006 **	N/A	9/2006 **	N/A	N/A	No	100	50	0	No	N/A	Existing	Stationary	ZZZZ
Olympian	Diesel Generator - Flare	Diesel	15	CI	85	Yes	No	2001-2002	N/A	2001-2002	N/A	N/A	No	100	50	0	No	N/A	Existing	Stationary	ZZZZ

General Notes:

** According to Subpart IIII (60.4200(a)), construction commences or the date the engine is ordered by the owner or operator.
 ** Actual order date of the engine was not available, engine was deployed at the site on 25 September 2006, NRSWA Board approved the purchase of the generator on 17 May 2006 - order estimated before 12 June 2006.

- Area source of hazardous air pollutants (NOT a major source)
- Subject to National Emissions Standards for Hap (NESHAP) - 40 CFR 63 Subpart ZZZZ

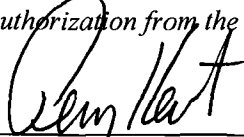
ATTACHMENT 3

**FDEP FORM NO. 62-201.900(1), APPLICATION
RESPONSIBLE OFFICIAL CERTIFICATION PAGE**

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Perry Kent
2. Owner/Authorized Representative Mailing Address... Organization/Firm: New River Solid Waste Association Street Address: PO Box 647. City: Raiford State: Florida Zip Code: 32083
3. Owner/Authorized Representative Telephone Numbers... Telephone: (386) 431-1000 ext. Fax: (386) 431-1099
4. Owner/Authorized Representative E-mail Address: pkent@nrswa.org
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  _____ Signature <u>10-29-13</u> Date

APPLICATION INFORMATION

Application Responsible Official Certification

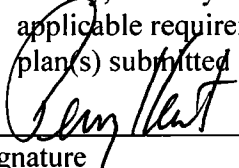
Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Perry Kent
2. Application 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 or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: New River Solid Waste Association Street Address: PO Box 647 City: Raiford State: Florida Zip Code: 32083-0647
4. Application Responsible Official Telephone Numbers... Telephone: (386) 431-1000 ext. Fax: (352) 431-1099
5. Application Responsible Official E-mail Address: pkent@nrswa.org

APPLICATION INFORMATION

6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.



Signature

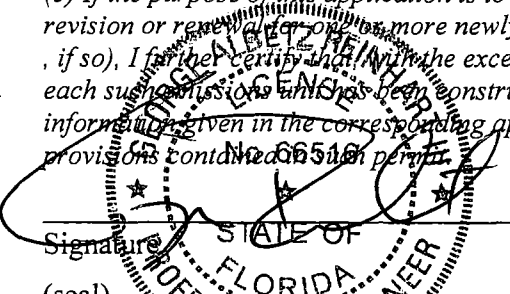
10-29-13
Date

ATTACHMENT 4

**FDEP FORM NO. 62-201.900(1), PROFESSIONAL
ENGINEER CERTIFICATION PAGE**

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: George Reinhart, PE Registration Number: 66516
2. Professional Engineer Mailing Address... Organization/Firm: Jones Edmunds & Associates, Inc. Street Address: 730 NE Waldo Road City: Gainesville State: Florida Zip Code: 32641
3. Professional Engineer Telephone Numbers... Telephone: (352) 377 - 5821 ext. 1346 Fax: (352) 377 - 3166
4. Professional Engineer E-mail Address:
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> (1) <i>To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> (2) <i>To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> (3) <i>If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> (5) <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in the permit.</i> Signature: _____ Date: 10/29/13 (seal) 

* Attach any exception or certification statement.