Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT

In the Matter of a Request for Administrative Correction:

Mr. Fernando Casey, District Manager
Waste Management, Inc. of Florida
3750 White Lake Boulevard
Naples, Florida 34117

Project No. 0210051-023-AV
Administrative Correction to:
Permit No. 0210051-022-AV
Collier County

Enclosed are the administratively corrected pages to Title V Air Operation Permit No. 0210051-022-AV for the operation of the Collier County Landfill located in Collier County at 3750 White Lake Boulevard, Naples, Florida 34117. This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request dated April 30, 2016, to removed obsolete conditions and a permitting note in Title V permit No. 0210051-022-AV. This corrective action does not alter the effective dates of the existing permit.

The Department of Environmental Protection (Department) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, Agency_Clerk@dep.state.fl.us, before the deadline. Petitions must be filed within 14 days of receipt of this administratively corrected permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency_Clerk@dep.state.fl.us, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

David Lyle Read, P.E.
2016.05.05 08:31:22 -04'00'

For:
Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administratively Corrected Permit (including the corrected page(s)) or a link to these documents made available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested to the persons listed below:

Mr. Fernando Casey, Waste Management: fcasey2@wm.com
Mr. Frederick Nassar, Waste Management: fnassar@wm.com
Mr. Carter Endsley, SD Office: carter.endsley@dep.state.fl.us
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

2016.05.05
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The following permit condition is revised as indicated. ~~Strikethrough~~ is used to denote the deletion of test Double-underlines are used to denote the addition of text. All changes are emphasized with shading.

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
006	Reciprocating Internal Combustion Engine (RICE) No. 1
007	RICE No. 2
008	RICE No. 3
009	RICE No. 4
010	RICE No. 5

Each emissions unit is a 0.8 megawatt (MW) spark ignition reciprocating internal combustion engine (RICE). Each engine has a power output of 1,148 brake horsepower (bhp) and a gas flow of 335.9 scfm. A gas treatment system consisting of gas dewatering, gas compressor and blowers, air-to-gas coolers, and filtration (particulate removal via 10 micron filters) will be used to clean the landfill gas before it is burned in the engines. The gas treatment system will not be equipped with atmospheric vents. Each engine has a stack height of 37 feet 8 inches (including silencer), an exit diameter of 1.33 feet, an exit temperature of approximately 847 °F, and an actual volumetric flow rate of approximately 6,035 scfm. The engines were manufactured in 2008 and ordered by the facility on October 4, 2010. Construction/installation commenced late December 2010/early January 2011. Initial start-up on the engines was May 3, 2011. These emissions units are not certified by the manufacturer to meet emission standards in 40 CFR 60 Subpart JJJJ, Standards of Performance for Spark Ignition Internal Combustion Engines.

{Permitting Note: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required, 62-212.400 Prevention of Significant Deterioration (PSD) for PSD Avoidance (This project avoids PSD Review by limiting the total gas flow to the combined units EU006 through EU015 and carbon monoxide (CO)emissions from units EU003 through EU015), 40 CFR 60 - Subpart A – General Provisions , 40 CFR 60, Subpart JJJJ – Standards of Performance for Spark Ignition Internal Combustion Engines, 40 CFR 63 Subpart A – General Provisions and 40 CFR 63 - Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine.}

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity.

a. *Gas Flow*. The process rate for each engine shall not exceed 335.9 scfm of landfill gas (LFG) based on a twelve month rolling average. ~~**The combined maximum total landfill gas (LFG) flow to the engines (EU006, EU007, EU008, EU009, EU010) and the new flares (EU014 and EU015, See Subsection E.) shall not exceed 2,687 scfm based on a twelve month rolling average.**~~

b. *Heat Input*. The maximum heat input rate for each engine shall not exceed 9.16 MMBtu/hr.

[Permit No. 0210051-017-AC and Rules 62-210.200(PTE) and 62-212.400(212),F.A.C. (PSD Avoidance)]

{Permitting Note: The maximum total LFG flow to each engine (335.9 scfm monthly average) is based upon the engines operating at 100 percent load (9.16 MMBtu/hr) with a minimum landfill gas methane concentration of 44.5 percent and a corresponding LFG heat value of 450 Btu/scf. Air construction permit revision No. 0210051-021-AC reclassified the facility as a minor source for PSD by limiting carbon monoxide (CO) emissions from the facility to 242 tons per year. Control devices may operate in any scenario, whether individually or in combination, as long as CO emissions remain below 242 tons per year (see condition FW 10). An estimate of facility wide CO emissions utilizing appropriate emission factors, gas flow rates (landfill gas and natural gas) shall be reported to the Compliance Authority on an annual basis. [0210051-021-AC, Specific Condition 2.

D.2. Authorized Fuel. The only fuel authorized to be burned is landfill gas (LFG). The use of any other fuel will require a modification to this permit. [Permit No. 0210051-014-AC and Rule 62-210.200(PTE), F.A.C.]

D.3. Restricted Operation. The hours of operation of are not limited (8760 hours per year). [Permit No. 0210051-014-AC and Rule 62-210.200(PTE), F.A.C.]

D.4. Air to Fuel Ratio. The owner or operator shall operate each engine at the manufacturer's recommended air-to-fuel ratio. [Permit No. 0210051-014-AC]

D.5. Fail-Safe Block Valve. The owner or operator shall install and maintain an automatic fail-safe block valve on each emission unit. The fail-safe block valve must stop the flow of the LFG to the engines in the event of an engine failure. [Permit No. 0210051-014-AC]

D.6. Elapsed Time Meters. The owner or operator shall equip each emission unit with a non-resettable elapsed time meter to indicate, in cumulative hours, the elapsed engine operating time. [Permit No. 0210051-014-AC]

D.7. Excess LFG from Engine. Excess LFG not used as fuel in the engines must be flared in accordance with the requirements of 40 CFR 60 Subpart WWW and in accordance with the conditions of this permit. [Permit No. 0210051-014-AC]

~~*{Permitting Note: The combined permitted gas flow to the engines and new flares (EU014 and EU015) is limited. The permitted gas flow may occur if all five engines are in operation In this situation, excess gas flow needs to be directed to the existing 3000 scfm flare (EU003) and not to the new flares (EU014 and EU015).}*~~

D.8. Treatment System Filtration. The owner or operator shall install, operate and maintain PM filters that are specified to remove PM not to exceed 10 micron as part of the LFG fuel pretreatment process. [Permit No. 0210051-014-AC]

D.9. Serial Numbers. The owner or operator shall always maintain nameplates on each engine that includes the serial numbers of the engine. [Permit No. 0210051-014-AC]

D.10. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(3), F.A.C.]

Emissions Standards

Unless otherwise specified, the averaging times for Specific Conditions **D.11 – D.18.** are based on the specified averaging time of the applicable test method.

D.11. Carbon Monoxide (CO). The CO emissions from each individual engine shall not exceed any of the following:

a. 6.84 pounds per hour (lbs/hr),
b. 29.93 TPY, and
c. 2.7g/hp-hr.

[Rule 62-212.400(12), F.A.C.; and Permit No. 0210051-014-AC]

*{Permitting Note: This facility is subject to the 5.0 g/bhp-hr CO emissions limitation in 40 CFR 60 Subpart JJJJ [60.4233(e) and Table 1, landfill/digester gas lean burn 500≤HP<1,350], however, the permittee requested the more stringent CO emissions limitations in Specific Condition **D.11.c**.}*

{Permitting Note: Air construction permit revision No. 0210051-021-AC reclassified the facility as a minor source for PSD by limiting carbon monoxide (CO) emissions from the facility to 242 tons per year. Control devices may operate in any scenario, whether individually or in combination, as long as CO emissions remain below 242 tons per year (see Specific Condition FW10). An estimate of facility wide CO emissions utilizing appropriate emission factors, gas flow rates (landfill gas and natural gas) and diesel fuel usage shall be reported to the Compliance Authority on an annual basis. [0210051-021-AC, Specific Condition 2.]}

D.12. Nitrogen Oxides (NO_X). NO_X emissions from each individual engine shall not exceed any of the following:

a. 3.8 lbs/hr,
b. 16.63 TPY, and
c. 1.5 g/hp-hr.

[Rule 62-212.400(12), F.A.C.; and Permit No. 0210051-014-AC]

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
014	1,200 scfm Flare
015	1,200 scfm Flare

Emissions units EU014 and EU015 are each a Parnel Biogas (Model 10-094) 1,200 scfm flare on a single skid**.** The two flares operate independently of each other. The maximum gas flow to both flares is 2,400 scfm. However, the combined maximum permitted capacity for these two flares and five engines (EU006 through EU010 defined in air construction permit No. 0210051-014-AC) combined is limited to 2,687 scfm. Each flare has a stack height of 42 feet.), a combustion temperature of 1,400°F and an exit diameter of 0.67 feet. Construction of the flares commenced March 7, 2011 and initial start-up was June 17, 2011.

{Permitting Note: These emissions units are regulated under Rule 62-210.300, F.A.C., Permits Required, 62-212.400 Prevention of Significant Deterioration (PSD) for PSD Avoidance (project, 0210051-014-AC, avoided PSD Review by limiting the total gas flow to the combined units EU006 through EU015), 40 CFR 60, Subpart A – General Provisions, 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. Project 0210051-021-AC limited carbon monoxide emissions from units EU003 and EU006 through EU015.}

Essential Potential to Emit (PTE) Parameters

E.1. Permitted Capacity. The process rate for each Parnel Biogas flare shall not exceed 1,200 scfm of LFG based on a twelve month rolling average. ~~**The combined maximum total LFG flow to the two 1,200 scfm flares (EU014 and EU015) and the five engines (EU006, EU007, EU008, EU009, EU010) shall not exceed 2,687 scfm based on a twelve month rolling average.**~~ [Rule 62-210.200(PTE), F.A.C. and 62-212.400(212), F.A.C. for PSD Avoidance, Permit No. 0210051-014-AC]

{Permitting Note: Air construction permit revision No. 0210051-021-AC reclassified the facility as a minor source for PSD by limiting carbon monoxide (CO) emissions from the facility to 242 tons per year. Control devices may operate in any scenario, whether individually or in combination, as long as CO emissions remain below 242 tons per year (see Specific Condition FW10). An estimate of facility wide CO emissions utilizing appropriate emission factors, gas flow rates (landfill gas and natural gas) and diesel fuel usage shall be reported to the Compliance Authority on an annual basis. [0210051-021-AC, Specific Condition 2.]

E.2. Restricted Operation. The hours of operation of are not limited (8760 hours per year). [Rule 62-210.200(PTE), F.A.C.]

E.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(3), F.A.C.]

Emissions Standards

Unless otherwise specified, the averaging time for Specific Condition **E.4.** is based on the specified averaging time of the applicable test method.

E.4. Visible Emissions. The flare shall be operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. [40 CFR 60.18(c), Permit No. 0210051-014-AC]

Monitoring of Operations

E.5. Gas Flow. The total LFG flow to each flare shall be continuously monitored. The permittee shall install, operate and maintain LFG flow meters to continuously measure the total LFG flow to each flare. The flow meters shall be installed to not include LFG flow to the engines (EU006, EU007, EU008, EU009, EU010) or the 3,000 scfm flare (EU003). [Permit No. 0210051-014-AC]