Sun Country Materials, LLC

Facility ID No. 0571457
Hillsborough County

Initial Title V Air Operation Permit

Permit No. 0571457-002-AV

Permitting and Compliance Authority:

Environmental Protection Commission
of Hillsborough County
3629 Queen Palm Drive
Tampa, FL 33619
Telephone: (813) 627-2600
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Initial Title V Air Operation Permit

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Sun Country Materials, LLC
5135 Madison Ave.
Tampa, Florida 33619

Permit No.0571457-002-AV
Facility ID No. 0571457
Initial Title V Air Operation Permit

The purpose of this permit is to issue the initial Title V air operation permit for the above referenced facility. The existing construction and demolition (C&D) disposal facility is located in Hillsborough County at 11457 County Road 672, Riverview, FL 33579. UTM Coordinates are: Zone 17, 3704.93 East, 30717.19 North. Latitude is: 27 46 11 North; and, Longitude is: 82 18 51 West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: June 12, 2017
Renewal Application Due Date: October 30, 2021
Expiration Date: June 12, 2022

Janet L. Dougherty

Janet L. Dougherty
Executive Director

JLD/LAW/law

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This facility is a construction and demolition (C&D) disposal facility, which consists of a closed disposal area and three active disposal cells – Cell Nos. 1, 2, and 3. Additional disposal cells may be opened in the future.

This permit authorizes the operation of a Perennial Energy, Inc., Landfill Gas Candlestick Flare. The flare is used to combust gas and to control odors from the disposal facility. The flare is capable of handling gas flow rates of up to 722 standard cubic feet per minute (scfm). The flare is limited to a monthly average of 13,140,000 scf, which is based on a maximum flow rate of 300 scfm, as requested by the permittee. The flare combusts propane as a backup fuel as needed.

The 6-inch candlestick flare combusts gas from the closed disposal area and from the active disposal cell Nos. 1, 2, and 3. The gas from these areas is vented to the flare using a gas collection system, which consists of collection piping and a blower that applies a vacuum to the collection piping. As more cells are opened in the future, the gas from those cells will also be vented to the flare. The potential SO_2 emissions from the combustion of the gas have been estimated to be 222 tons/year.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Landfill Gas Collection and Candlestick Flare

Also included in this permit are miscellaneous insignificant emissions units and/or activities (see Appendix I, List of Insignificant Emissions Units and/or Activities).

Subsection C. Applicable Regulations.

Based on the initial Title V air operation permit application received February 2, 2017, this facility is not a major source of hazardous air pollutants (HAP). A summary of applicable regulations is shown in the following table.

Regulation	EU No.
Federal Rule Citations	
NA	
State Rule Citations	
Rule 62-296.320, F.A.C.	001
Local Rule Citations	
Rules of the EPCHC, Chapter 1-3	001

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable**.** Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C. and EPCHC Rule 1-3.22(3)]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. Emissions from the following types of activities in Hillsborough County are further subject to a general 5% opacity standard: loading or unloading of materials to or from containers such as rail cars, trucks, ships, storage structures and stockpiles; permanent conveyor systems; storage of materials in structures such as silos or enclosed bins, which have a storage capacity of fifty cubic yards or more; crushing, grinding, sizing and screening operations; and, static drop transfer points. These regulations do not impose a specific testing requirement. [Rules 62-296.320(4)(b)1, F.A.C. and Rule 1-3.52, HCEPC]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Paving and maintenance of roads, parking areas, and yards.
b. Application of water or dust suppressants to control emissions from such activities such as vehicular traffic and earth moving.
c. Application of asphalt, water, oil, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
d. Application of daily cover in active waste disposal areas.
e. Landscaping or planting of vegetation.
f. Reduce vehicular speed, as necessary. Post limits, if necessary.

[Rule 62-296.320(4)(c), F.A.C.; Permit No. 0571457-001-AC; and proposed by applicant in the initial Title V air operation permit application received February 2, 2017]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous

calendar year, to the Department of Environmental Protection's (DEP) Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, Post Office Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013)]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit and to the US. EPA at the address shown below within 60 days after the end of each calendar year during which the Title V air operation permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303
Attn: Air Enforcement Branch

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www2.epa.gov/rmp. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

Other Requirements

FW9. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rule 62-4.070(3), F.A.C. and Permit No. 0571457-001-AC]

FW10. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the EPCHC may require the permittee to conform to new or additional conditions. The EPCHC shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPCHC may grant additional time. [Rule 62-4.080, F.A.C. and Permit No. 0571457-001-AC]

FW11. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the EPCHC. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C. and Permit No. 0571457-001-AC]

FW12. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Environmental Protection Commission of Hillsborough County. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

FW13. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited. [Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended, and Permit No. 0571457-001-AC]

FW14. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

Subsection A. Emissions Unit 001 - Gas Collection and Candlestick Flare

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	Landfill Gas Collection and Candlestick Flare

The Perennial Energy, Inc., Landfill Gas Candlestick Flare is used to combust gas and to control odors from the active disposal cell Nos. 1, 2, and 3 and from the closed disposal area. The gas from these areas is vented to the flare using a gas collection system, which consists of collection piping and a blower that applies a vacuum to the collection piping. As more cells are opened in the future, the gas from those cells will also be vented to the flare.

{Permitting Note: This emission unit is regulated under Rule 62-296.320, F.A.C. and Ch. 1-3, Rules of the EPCHC}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The following limitations shall apply to the candlestick flare:

a. The airflow of the gas venting to the candlestick flare shall not exceed a monthly average of 13,140,000 standard cubic feet.
b. The candlestick flare shall combust only gas with propane as a backup fuel.

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C. and Permit No. 0571457-001-AC]

A.2. Hours of Operation. The hours of operation for this emission unit are not restricted. [Rule 62-210.200(PTE), F.A.C. and Permit No. 0571457-001-AC]

A.3. Flare Operation. The facility shall operate and maintain the flare according to the manufacturer's recommended practices. The flare's operation and maintenance manuals and records shall be kept on site for review upon request. [Rule 62-4.070(3), F.A.C. and Permit No. 0571457-001-AC]

A.4. 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.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging times for Specific Condition Nos. A.5., A.10., and A.11. are based on the specified averaging time of the applicable test method.

A.5. Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. [Rule 62-296.320(4)(b)1, F.A.C. and Ch. 1-3.52(1), Rules of the EPCHC]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.6. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided (1) best practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration. Excess emissions that are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(1), F.A.C.]

A.7. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.8. Test Methods. When required, tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources
ASTM D 5504-12	Standard Test Method for Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Chemiluminescence

The above Method 9 is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the EPCHC. [Rule 62-204.800, F.A.C. and Permit No. 0571457-001-AC]

A.9. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.10. Annual Compliance Tests Required. During each calendar year (January 1st to December 31st), the flare (EU No. 001) shall be tested to demonstrate compliance with the emissions standards for visible emissions (Specific Condition No. A.5). The EPA Method 9 test for the emission unit shall be a minimum of thirty (30) minutes in duration. [Rule 62-297.310(8), F.A.C.]

A.11. H_2S Compliance Test. Except as provided in subparagraph 62-297.310(8)(b)3., F.A.C. (see condition TR7.b.(3) in Appendix TR – Facility-wide Testing Requirements), the gas venting to the flare shall be tested for H_2S concentration as follows: [Rules 62-210.300(2)(a) and 62-297.310(8)(b), F.A.C.]

A) Prior to obtaining a renewed operation permit. This test shall be performed at least 120 days prior to the expiration date of this permit and
B) Within 60 days of venting a new disposal cell to the flare.

A.12. At least 45 days prior to performing the test specified in Specific Condition No. A.11. above, the permittee shall submit the test methodology, the sample collection time, the number of cells that will be vented to the gas collection system, and the location where the sample will be taken. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.13. At least 15 days prior to the date on which each required emissions test (Specific Condition Nos. A.10. and A.11.) is to begin, the owner or operator shall notify the EPC, unless shorter notice is agreed to by the EPC. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the EPC a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the EPC by mutual agreement. [Rule 62-297.310(9), F.A.C.]

Recordkeeping and Reporting Requirements

A.14. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440(1)(b), F.A.C.]

A.15. The permittee shall maintain a monthly recordkeeping system as follows in order to ensure compliance with Specific Condition Nos. A.1. and A.2. The records shall be maintained for a minimum of 5 years. The records shall be made available upon request to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency for inspection. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.]

a. Month, Year
b. Hours of operation of the flare
c. The monthly total airflow of the gas venting to the candlestick flare (scfm)
d. Rolling twelve month total of b. and c., above

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.