

## STATEMENT OF BASIS

### **Initial** Title V Air Operation Permit Permit No. 0694864-001-AV

#### **APPLICANT**

The applicant for this project is Lake County Board of County Commissioners. The applicant's responsible official and mailing address are:

Mr. Gary Debo, Operations Compliance Coordinator  
Lake County Board of County Commissioners  
P.O. Box 7800  
Tavares, Florida 32778-7800

#### **FACILITY DESCRIPTION**

The applicant operates the Lake County Central Solid Waste Management Facility (LCCSWMF), which is located at 13130 County Landfill Road, Tavares, Florida.

LCCSWMF is a multi-function solid waste management facility that includes Class I waste disposal, ash and construction & demolition (C&D) debris waste disposal, yard waste mulching, recyclables separation and processing, household hazardous waste collection and storage, waste tire storage and transfer, freon recovery, paper, scrap metal and white goods processing, and electronics recycling.

This Class I Landfill has a design capacity equal to or greater than 2.5 million megagrams by mass or 2.5 million cubic meters by volume. The landfill was constructed in three (3) phases. Phase III has two different cells – MSW and Ash Cell (each cell is Class I landfill). Operation of Phase III is authorized under Solid Waste Permit No. SO35-0125106-017. A brief history of the landfill is as follows:

<b>Landfill</b>	<b>Capacity (CY)</b>	<b>Capacity (MG)</b>	<b>Comments</b>
Phase I	--	1,878,039	The landfill ceased operations in 1994 and was closed in 1995 with a LLDPE liner system.
Phase II	876,000	993,367	Tonnage is based on 2500 pcy density (majority ash). Out of this tonnage, only non-ash waste, i.e., 415,844 MG is counted towards Title V permit emission calculations. This landfill started to accept waste in 1991, has reached capacity and will be closed soon.
Phase III (Ash Cell)	243,000	275,557	Capacity in MG based on 2500 pcy (majority of waste disposed is expected to be ash). It started to accept waste in 2011. However, please note that any ash waste is not counted towards emission calculations.
Phase III (MSW Cell)	1,500,000	850,485	Capacity in MG based on 1250 pcy (expected to receive only MSW waste). No waste has been disposed into this landfill to date.

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The landfill is not a major source of HAPs. The landfill does not contain a bioreactor. No leachate has been added to Phases I and II. However, leachate can be re-circulated in Phase III as it is permitted for liquids addition. However, volumetric moisture content of the waste will always be below 33% and therefore, will not meet bioreactor definition.

Currently, the landfill is required to submit an NMOC emissions rate report **annually** to demonstrate compliance with NMOC emissions threshold for collection and control system exemption. The NMOC emissions are calculated to be less than 50 megagrams per year and therefore, the landfill is not required to install a landfill gas collection and control system at this time. Currently, the landfill gas emissions are not collected and controlled at this time.

*Design capacity* means the maximum amount of solid waste a landfill can accept, as indicated in terms of volume or mass in the most recent permit issued by the State, local, or Tribal agency responsible for regulating the landfill, plus any in-place waste not accounted for in the most recent permit. If the owner or operator chooses to convert the design capacity from volume to mass or from mass to volume to demonstrate its design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, the calculation must include a site specific density, which must be recalculated annually.

If the estimated NMOC emission rate as reported in the annual report to the Administrator is less than 50 megagrams per year in each of the next five consecutive years, the owner or operator may elect to submit an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual report. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the 5 years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based shall be provided to the Department. This estimate shall be revised at least once every 5 years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the 5-year estimate, a revised 5-year estimate shall be submitted to the Administrator. The revised estimate shall cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

### PROJECT DESCRIPTION

The purpose of this permitting project is for an **initial** Title V permit for the above referenced facility.

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit Application received **April 20, 2012**

Additional Information Request dated **May 15, 2012**

Additional Information Response received **May 17, 2012**

### PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

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NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

- 40 CFR 60, Subpart A – General Provisions; and
- 40 CFR 60, Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

- 40 CFR 63, Subpart A – General Provisions;
- 40 CFR 63, Subpart AAAA - Municipal Solid Waste Facilities; and
- 40 CFR 63, Subpart ZZZZ - Reciprocating Internal Combustion Engines.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

### PROJECT REVIEW

This project is the **Initial** Title V Air Operation Permit for a new municipal solid waste (MSW) landfill in Lake County, Tavares, Florida.

### CONCLUSION

This project is for the initial Title V air operation permit. This initial Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.