STATEMENT OF BASIS

Marion County Board of County Commissioners
Marion County Baseline Landfill
Facility ID No.: 0830124
Marion County

Title V Air Operation Permit Revision
DRAFT/PROPOSED Permit Project No.: 0830124-009-AV
Revision of Title V Air Operation Permit No.: 0830124-007-AV

The initial Title V Air Operation Permit, No. 0830124-001-AV, was effective/issued on December 10, 1997. This Title V Air Operation Permit **Revision** 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 shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit revision is to incorporating the terms and conditions of the air construction permit, No. 0830124-006-AC, for reciprocating internal combustion engine/generator sets No. 1 and 2. Both are spark ignition internal combustion engine/generator sets manufactured by Caterpillar, Model G3520C (2,233 hp and 1.6 MW each). This will add EU 003 and EU 004 to the Title V Air Operation Permit. The facility consists of a municipal solid waste landfill with a candlestick flare and two internal combustion engine/generator sets.

The applicable emission limitations are as follows: The landfill, EU 001, is subject to 40 CFR Part 60, Subpart A (General Provisions), Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills, and 40 CFR Part 63, Subpart AAAA, National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. The facility is also subject to the General Volatile Organic Compound (VOC) standard per Rule 62-296.320(1)(a), F.A.C.; the Objectionable Odor Rule per Rule 62-296.320(2), F.A.C.; and Reasonable Precautions to Prevent Emissions of Unconfined Particulate Matter (PM) per Rule 62-296.320(4)(c)2., F.A.C.; Visible Emissions per Rule 62-296.320(4)(b)1., F.A.C. The flare is not subject to compliance assurance monitoring (CAM) under 40 CFR Part 64.

EU 003 and 004 - Both are spark ignition internal combustion engine/generator sets manufactured by Caterpillar, Model G3520C (2,233 hp and 1.6 MW each). The engines are fired by landfill gas only conveyed from the existing flare station through a treatment system that consists of compression, dehydrating, and filtering processes prior to being combusted in the engines. The existing flare will continue to operate to burn any excess landfill gas collected but not sent to the engines. Each engine is subject the requirements of 40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and Visible Emissions per Rule 62-296.320(4)(b)1., F.A.C.

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

Based on the initial Title V Air Operation Permit application received on December 10, 1997, this facility is **not** a major source of hazardous air pollutants (HAPs).