



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 30, 2008

Mr. David H. Penoyer, P.E.
SCS Engineers
4041 Park Oaks Boulevard
Suite 100
Tampa, Florida 33610

Re: Request for Higher Operating Temperature for Landfill Gas Extraction Wells
Polk County North Central Landfill
AIRS Facility ID No. 1050298

Dear Mr. Penoyer:

The Department has reviewed your May 2, 2008 letter requesting, on behalf of the Polk County Solid Waste Division, to establish new operating temperatures for landfill gas extraction wells at the Polk County North Central Landfill. Federal NSPS Subpart WWW 40 CFR 60.753, allows for new wellhead operating levels to be established by the landfill owner or operator. Because the owner or operator can establish the new operating temperatures, these changes are not considered variances and no approval is required by the Department.

As required in Subpart WWW 40 CFR 60.753(e) when establishing a higher operating value (wellhead temperature or nitrogen/oxygen level), a demonstration must be made showing, with supporting data, that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition. Once this demonstration is performed, the extraction well operating value can be adjusted.

Higher operating temperature levels should be established individually for each well location and should be based on actual measured temperatures at that well and not anticipated temperature levels or temperature levels at other wells. Records should be kept for each wellhead for which a higher operating temperature has been established. The records should include a description of the corrective action taken and the demonstration done prior to establishing the higher operating level. Well operating temperature measurements, operating levels and demonstration data shall be kept on site and available for Department review during compliance inspections. The same procedures should be used for establishment of higher nitrogen/oxygen level operating values for individual wells.

Semiannual reports required by NSPS Subpart WWW 40 CFR 60.757(f) and NESHAP Subpart AAAAA 40 CFR 63.1980 should indicate any well(s) for which higher operating levels have been established, and what those levels are such that the Department is aware of how exceedances are being determined. For newly established operating levels, the report should include a statement that a demonstration in accordance with 40 CFR 60.753(e) was done for that well.

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Appendix 3 of your letter indicates that carbon monoxide levels at well 125 were in excess of 1,000 parts per million, which is of concern to the Department. The area around this well should continue to be monitored for signs of fire.

Should you have any questions concerning this letter please contact Max Grondahl, the assigned Southwest District Air Program compliance inspector for your facility, at (813) 632-7600, extension 116, or via email at max.grondahl@dep.state.fl.us.

Sincerely,



Danielle D. Henry
Environmental Compliance Manager
Southwest District Air Program

DH/MG/DZ

copies to:

Mr. Allen R. Choate, Engineering Manager, P.E.
Polk County Solid Waste Division
10 Environmental Loop
Winter Haven, FL 33880

Mr. Tom Breshin
Environmental Health and Safety Manager
Wheelabrator Ridge
3131 K-ville Avenue
Auburndale, FL 33823

Susan Pelz, Manager, Southwest District Solid Waste Section