Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

(Sent by Electronic Mail – Return Receipt Requested)

Ms. Lois Rose, Solid Waste Manager
Sarasota County Board of County Commissioners
4000 Knights Trail Road
Nokomis, Florida 34276

Re: Title V Air Operation Permit Renewal
Proposed Permit No. 1150089-010 -AV
Sarasota County Central County Solid Waste Disposal Complex

Dear Ms. Lois Rose:

One copy of the proposed permit determination for the renewal of the Title V air operation permit for the Sarasota County Central County Solid Waste Disposal Complex located at 4000 Knights Trail Road, Nokomis, Sarasota County, is enclosed. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"http://www.dep.state.fl.us/air/eproducts/apds/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to USEPA. If USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Pawan Subramaniam, at 850/717-9033.

Executed in Tallahassee, Florida.

For:

Jeffery F. Koerner, Deputy Director
Division of Air Resource Management

JFK/dlr/pks

Copies sent by electronic mail to the following:

Ms. Lois Rose, Manager Solid Waste, Sarasota County: lerose@scgov.net
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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.

Digitally signed by Elizabeth Walker
Date: 2015.12.28 14:21:30 -05'00'

I. Public Notice.

An Intent To Issue Air Permit issued to Sarasota County Board of County Commissioners for the Sarasota County Central County Solid Waste Disposal Complex located at 4000 Knights Trail Road, Nokomis, Sarasota County, was clerked on October 9, 2015 The Public Notice Of Intent To Issue Air Permit was published in Sarasota Herald Tribune on October 21, 2015. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue Air Permit was received on October 27, 2015.

II. Public Comment(s).

No Comments were received from the public during the 30-day public comment period; however, comments were received from the Permittee. The comments were not considered significant enough to reissue the draft Title V air operation permit and require another Public Notice; therefore, the draft Title V air operation permit was changed. Those comments are addressed below. Additions to the permit conditions are indicated by a double underline. Deletions from the permit conditions are indicated by a ~~strike through~~.

Comments from the Permittee dated 11/12/2015.

Comment 1. EU 002 and EU 003 are listed as unregulated but do not appear to be included in Appendix U, should they be added?

Response 1. EU 002 (Roads and Earthmoving Operations) and EU 003 (Yard Waste Composting Operations) were left unmentioned in Appendix U by error. They have now been added to Appendix U.

Comment 2. In the statement of basis Page 3 of 3, we noted that the existing flare has been removed from this emissions unit, but then on Page 12 of 22 in permit, it mentioned the existing flare was EU 016, but the only place we see EU 016 is in the list of unregulated emission units on Page 2 of 22. We have two questions, does the flare still need to be mentioned in EU 001 as a future emissions unit since it will eventually become regulated by NSPS when the landfill exceeds the NMOC emission threshold. If not, if left as is, will a permit mod need to be done when the landfill exceeds the NMOC limits to move EU 016 to a regulated emissions unit?

Response 2. The flare has been mentioned in EU 001 (Municipal Solid Waste Landfill) description. When the landfill gas collection and control system become regulated by New Source Performance Standards (NSPS), the facility's Title V air operation permit will be revised and the EU 016 (Landfill gas collection system and flare) will be stated as a regulated emissions unit at that time.

Comment 3. On Page 6 of 22 of the permit, under the description of EU 001 should the Landfill Gas to Energy (LFGTE) be mentioned along with the flare system?

Response 3. The Department agrees with the comment. EU 001 (Municipal Solid Waste Landfill) description has been updated.to include LFGTE as follows:

Most of the collected LFG is sent to LFGTE system, consisting of three Caterpillar (CAT®) Model No. G3520C reciprocating internal combustion engines (RICE)-driven electricity generators to produce 4.8 megawatts (MW) of electricity for sale to the grid.

Comment 4. Will the waste in place be updated for the update submitted in October?

Response 4. The waste in place has been updated to reflect the update submitted to the Department on October 24, 2015. Note to the facility description has been updated as follows:

(Note – Waste in place at the end of 2014 was ~~3,862,071~~ 3,876,820 Mg (~~4,257,205~~ 4,264,502 tons).

Comment 5. Leachate Cleanout Extraction Points Note – The first sentence seems inaccurate, the leachate cleanouts are connected to the LFG collection system, but as stated in the next sentence they are operated at minimal vacuum.

Response 5. The Department agrees with the comment and has made the correction in the EU 001 (Municipal Solid Waste Landfill) description as follows:

Leachate Cleanout Extraction Points Note – The leachate cleanout extraction points are ~~not~~ connected to the LFG collection system well field. The applicant intends to operate the leachate cleanout extraction points with minimal vacuum (and sometime positive pressure) to reduce the chance for air intrusion and potential subsurface combustion.

Comment 6. Conditions A.3, A.9 and A.10 – these relate to active asbestos disposal which is also covered in the site's FDEP Solid Waste Operations Permit, can this section be removed from the permit since it is addressed by other permits?

Response 6. Specific Conditions **A.3** (Operational Standards for Active Asbestos Waste Disposal), **A.9** (Asbestos Records and Reports) and **A.10** (Asbestos Location Records) of the permit address the asbestos requirements pertinent to Air, contained in Subpart M, National Emission Standards for Asbestos of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP). Therefore, Specific Conditions **A.3**, **A.9**, and **A.10** are left unchanged.

Comment 7. Condition B.17 indicates that "*Each engine shall be equipped with a gas flow meter to monitor the total volumetric flow rate.*" This is inconsistent with conditions of the construction permit and the requirements of 40 CFR 63.6625(c). The facility is equipped with a fuel flow meter that measures the flow of landfill gas to all engine combined. Condition 23 of the construction permit specified "*… monitor and record the fuel usage for all engines combined with a separate fuel meter to measure the volumetric flow rate of landfill gas.*" As it is used in the construction permit and 40 CFR 63.6625(c), 'separate fuel meter' refers to a separate flow meter for each fuel, not for each engine.

Response 7. The Department agrees with the comment. Specific Condition **B.17**. has been changed as follows:

> **B.17.** Gas Flow Meter. ~~Each engine shall be equipped with a~~ A separate gas flow meter shall be operated per fuel type, to monitor the total volumetric flow rate. [40 CFR 63.6625(c); and Permit No. 1150089-008-AC/PSD-FL-422]

Comment 8. In the Section III, Subsection B description, there is mention of EU016, but we do not see where that exists.

Response 8. EU 016 (Landfill gas collection system and flare) is an unregulated emissions unit and is therefore listed in Appendix U.

Comment 9. Specific Condition B.31 shows a **Condition Error!** message.

Response 9. The Department has corrected Specific Condition **B.31**. as follows:

> **B.31.** Annual Reports. As part of the Annual Operating Report required in Facility-wide ~~**Condition Error!**~~ **Condition FW6.** the following data shall be reported:
>
> a. Fuel flow rate of each fuel and the heating values that were used in your calculations. The permittee shall also demonstrate that the percentage of heat input provided by landfill gas or digester gas is equivalent to 10 percent or more of the total fuel consumption on an annual basis.
>
> b. The operating limits provided in the permittee's federally enforceable permit, and any deviations from these limits.
>
> c. Any problems or errors suspected with the meters.

Comment 10. EU No. 015 is the emergency generator associated with the gas-to-energy facility. However, the description indicates that the emergency generator engines provide power service to the administration/scale house buildings. Therefore, can we add a qualifier that EU 014 is for the administration/scale house buildings and EU 015 is for the LFGTE Facility? Can we also add the word "Stationary" to them to better match the description later in this section as emergency stationary RICE?

Response 10. The Department agrees with the comment. The emissions units' descriptions have been changed as follows:

EU No.	Brief Description

014	126 HP (94kW) Stationary Compression Ignition NSPS Emergency Generator
015	201 HP (150 kW) Stationary Compression Ignition NSPS Emergency Generator

EU 014, 126 HP stationary compression ignition emergency generator provides emergency backup power service to the administration/scale house buildings at the Central County Solid Waste Disposal Complex. EU 015, 201 HP stationary compression ignition emergency generator provides emergency backup power service to the landfill gas to energy facility. EUs 014 and 015 ~~These compression ignition emergency generator engines provide power service to the administration/scale house buildings at the Central County Solid Waste Disposal Complex. They~~ are not part of a demand response program and are not to be used for peak shaving or planned for non-emergency operation, except that non-emergency and non-maintenance operation will not exceed 50 hours per year for each engine. The engines do not have continuous emissions monitoring system (CEMS) or continuous parameter monitoring system (CPMS) for any pollutant.

Comment 11. For Conditions C.3 through C.5 it would be helpful to specify the applicable emission standard for which the manufacturer issues the certification. For example, EU 015 is subject to the Tier 3 emission standards in 40 CFR 89.112.

Response 11. Specific Conditions **C.3** through **C.5**. have been changed as follows:

C.3. NMHC + NO_X Emissions. Emissions of non-methane hydrocarbons (NMHC) plus nitrogen oxide NO_X shall not exceed:
a. *EU 014*: 4.0 grams per kilowatt hour (g/kW-hr), (Tier 3).
b. *EU 015*: 4.0 g/kW-hr, (Tier 3).
[40 CFR 60.4205(b), 40 CFR 60.4202(a)(2) and 40 CFR 89.112(a)]

C.4. CO Emissions. Carbon monoxide (CO) emissions shall not exceed:
a. *EU 014*: 5.0 g/kW-hr, (Tier 3).
b. *EU 015*: 3.5 g/kW-hr, (Tier 3).
[40 CFR 60.4205(b), 40 CFR 60.4202(a)(2) and 40 CFR 89.112(a)]

C.5. PM Emissions. Particulate matter (PM) emissions shall not exceed:
a. *EU 014*: 0.30 g/kW-hr, (Tier 3).
b. *EU 015*: 0.20 g/kW-hr, (Tier 3).
[40 CFR 60.4205(b), 40 CFR 60.4202(a)(2) and 40 CFR 89.112(a)]

Comment 12. Specific Condition C.14(a) indicates that the permittee must have on file the "*Engine manufacturer data indicating compliance with the standards*." The owner / operator is only required to have the manufacturer's certification that the engine meets the applicable emission standards.

Response 12. Since the intent of stating "*Engine manufacturer data indicating compliance with the standards*" was for the permittee to keep a copy of the manufacturer's certification on site, Specific Condition **C.14**(a). is changed as follows:

a. ~~Engine manufacturer data indicating compliance with the standards~~ A Copy of the manufacturer's certification.

Comment 13. Brief Description of Emissions Units and/or Activities for Appendix I, Insignificant Activities – several of the items listed here may be replaced or exchanged with similar equipment, can the Department add an overall statement that these units may be replaced periodically with similar type units so that if a different model or make of engine can be used or does the list have to be updated each time a unit is switched out? The note may be similar to the following:

"*Note: Equipment listed above with specific manufacturers and models may be replaced as needed with similar types of units depending on need for replacement or exchange from operations.*"

Response 13. Emissions units or activities which are added to a Title V source after issuance of a permit shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify as insignificant. Therefore, a note in

the manner requested by the permittee has not been added. The owner/operator shall submit a notice to the Department when new exempt/insignificant units are added to the facility and they will be incorporated into the permit the next time it is opened.

III. Conclusion.

The enclosed proposed Title V air operation permit includes the aforementioned changes to the draft Title V air operation permit.

The permitting authority will issue the proposed permit No. 1150089-010-AV, with the changes noted above.