

Osceola Road Solid Waste Management Facility
Facility ID No.: 1170084
Seminole County

Title V Air Operation Permit

DRAFT/PROPOSED Permit Project No.: 1170084-007-AV

Permitting Authority:
DEP Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803
Telephone: 407/894-7555
Fax: 407/897-5963

Compliance Authority:
DEP Central District
3319 Maguire Boulevard, Suite 232
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DRAFT/PROPOSED Permit No.: 1170084-007-AV

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Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:

Seminole County
Board of County Commissioners
500 West Lake Mary Blvd.
Sanford, FL 32773-7499

DRAFT/PROPOSED Permit No.: 1170084-007-AV

Facility ID No.: 1170084

SIC No(s): 49, 4953

Project: Osceola Road Landfill Facility

The purpose of this permit is to revise Title V Air Operation Permit, No. 1170084-006-AV. This existing landfill facility is located at 1930 East Osceola Road, Geneva, Florida; UTM Coordinates: Zone 17, 492.00 km East and 3184.50 km North; and, Latitude: 28° 47' 30" North and Longitude: 81° 04' 42" West.

This 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 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.

Referenced attachments made a part of this permit:

Appendix B, 40CFR60, Subpart WWW; 40CFR63 Subpart AAAA, Combined General Provisions
Appendix C, 40CFR60, Subpart WWW; 40CFR63 Subpart AAAA, Combined Standard Conditions
Appendix D-1, Definitions for Subpart WWW – Municipal Solid Waste Landfills
Appendix E-1, 40CFR60 and 61, Subpart A, Flares, General Provisions
Appendix F, 40CFR63, Subpart ZZZZ; NESHAP for Stationary Reciprocating Internal Combustion Engines
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS
Tables 1, 2, and 3, Summaries of Requirements for Municipal Solid Waste Landfills

Effective Date:

tbd

Renewal Application Due Date: February 28, 2012

Expiration Date: August 30, 2012

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

James N. Bradner, P.E.
Program Administrator
Air Resources Management

JNB/az/jt

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of an active, Class I municipal solid waste disposal facility (landfill) with a design capacity equal to 45,000,000 cubic yards. The landfill started receiving waste in 1970. It is an active asbestos waste disposal site. There is no bioreactor at the landfill. Non-methane organic compound (NMOC) emissions are calculated to be equal to or greater than 50 megagrams per year. Collection and control of landfill gas emissions began in March 1999. The facility includes four landfill gas fired internal combustion engines with electric generators. Landfill gas emissions are collected and controlled by two flares when the gas is not being fired by the internal combustion engines.

Based on the Title V Air Operation Permit Revision application received May 1, 2008, the landfill is **not** a major source of HAPs, but is a major source of non-HAP pollutants.

This facility is subject to 40CFR60, Subparts WWW and A; 40CFR63, Subparts AAAA and A; and 40CFR63, Subpart ZZZZ.

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

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
001	Municipal solid waste landfill with two flares
002	Internal Combustion Engine No. 1 (1.6 MW)
003	Internal Combustion Engine No. 2 (1.6 MW)
004	Internal Combustion Engine No. 3 (1.6 MW)
005	Internal Combustion Engine No. 4 (1.6 MW)

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Statement of Basis

These documents are on file with the permitting authority:

Initial Title V Air Operation Permit issued August 10, 1998.
Title V Air Operation Permit Renewal issued August 27, 2002.
Application for a Title V Air Operation Permit Revision received July 22, 2003.
Title V Air Operation Permit Revision issued January 14, 2004.
Application for a Title V Air Operation Permit Renewal received February 27, 2007.
Application for a Title V Air Operation Permit Revision received May 1, 2008.

Subsection D. Miscellaneous.

The use of 'Permitting Notes' throughout this permit are for informational purposes only and are not permit conditions.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS are a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).
[Rule 62-296.320(4)(b)1., F.A.C.]
4. Prevention of Accidental Releases (Section 112(r) of CAA).
 - a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301/429-5018
 - b. The permittee shall 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]
5. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]
6. General Pollutant Emission Limiting Standards. 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, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions shall include the following:
 - a. Tightly cover or close all VOC containers when they are not in use;

- b. Tightly cover, where possible, all open troughs, basins, baths, tanks, etc.;
- c. Maintain all piping, valves, fittings, etc. in good operating condition;
- d. Prevent excessive air turbulence across exposed VOC; and
- e. Immediately confine and clean up spills of VOC containing materials.
[Rule 62-296.320(1)(a), F.A.C.]

7. Emissions of Unconfined Particulate Matter. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Application of asphalt, water, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities;
- b. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne;
- c. Landscaping or planting of vegetation; and
- d. Other techniques, as necessary.
[Rule 62-296.320(4)(c)2., F.A.C.]

8. When appropriate, any recordings, monitoring, or reporting requirements that are time specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the air compliance section of this office:

Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803
Telephone: 407/893-3336
Fax: 407/897-5963

10. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155
Fax: 404/562-9163

11. Annual Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the air compliance section of this office and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.

[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

12. Certification by Responsible Official (RO). In addition to the professional engineering

certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62.213.420(4), F.A.C.]

13. Annual Operating Report. A DEP Form No. 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" including the Emissions Report, shall be completed for each calendar year **on or before March 1** of the following year and submitted to the air compliance section of this office.

[Rule 62-210.370(3), F.A.C.]

14. At least 180 days prior to the expiration date of this operation permit, the permittee shall submit to this office four copies of the air permit application, DEP Form No. 62-210.900(1).

[Rule 62-4.090(1), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
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001	Municipal solid waste landfill with two flares
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{Permitting note: This emissions unit is regulated under: NSPS - 40 CFR 60, Subpart A, General Provisions, 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills; NESHAP - 40 CFR Part 63, Subpart A, General Provisions and 40 CFR Part 63, Subpart AAAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills, adopted and incorporated by reference in Rule 62-204.800, F.A.C., }

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A1. This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year.
[Rule 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A2. The flare control system shall be designed for and operated with no visible emissions except for periods not to exceed a total of five minutes during any two consecutive hours.
[Rule 40 CFR 60.18(c)(1)]

A3. The flare control system, when in use due to the internal combustion engines not operating, shall be operated with a flame present at all times, as determined by a thermocouple or any other equivalent device to detect the presence of a flame.
[40 CFR 60.18(c)(2)]

Test Methods and Procedures

{Permitting note: Table 3, Summary of Compliance Requirements for Municipal Solid Waste Landfills, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. }

A4. Each flare must be tested for visible emissions in accordance with EPA Method 22. The test period is 2 hours. Initial testing shall be conducted within 180 days of initial startup and subsequent testing shall be conducted annually.
[Rules 62-4.070 and 62-297.310(4)(a)2., F.A.C.]

A5. The permittee shall notify the Central District Office of the DEP, in writing, at least 15 days prior to the date on which the formal compliance test is to begin. The notification shall include the date, time and place of each such test, as well as the name of the contact person who will be responsible for coordinating and having such tests conducted for the owner.
[Rule 62-297.310(7)(a)9., F.A.C.]

A6. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8)(b), F.A.C.]

A7. This emission unit is subject to the following requirements from title 40 of the CFR Part 60 (see attached Appendix B and C):

40 CFR 60.7	Notification and record keeping
40 CFR 60.8	Performance tests
40 CFR 60.11	Compliance with standards and maintenance requirements
40 CFR 60.13	Monitoring requirements
40 CFR 60.14	Modification
40 CFR 60.15	Reconstruction
40 CFR 60.752(b)	Standards for air emissions from municipal solid waste landfills
40 CFR 60.757	Reporting requirements
40 CFR 60.758(a)	Record keeping requirements

Subsection B. This section addresses the following the following emission unit(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
002	Internal Combustion Engine No. 1 (1.6 MW)
003	Internal Combustion Engine No. 2 (1.6 MW)
004	Internal Combustion Engine No. 3 (1.6 MW)
005	Internal Combustion Engine No. 4 (1.6 MW)

{Permitting note: These emissions units are regulated under: 40CFR63, Subpart ZZZZ; National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), adopted and incorporated by reference in Rule 62-204.800, F.A.C. The electricity generation facility individual RICE will have power ratings that exceed 500 bhp. However, the maximum HAP emissions are limited to less than the major facility thresholds. Therefore, the proposed facility is not subject to the emission limitations and operating limitations but will be subject to the initial notification, reporting and recordkeeping requirement of the subpart.}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

B1. This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year.
[Rule 62-210.200(PTE), F.A.C.]

B2. Fuel fired in the engines is limited to LFG. The use of any other fuel will require an amendment to this permit.
[Rule 62-212.400, F.A.C.]

Emission Limitations and Standards

B3. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]

B4. Emissions Units Nos. 002-005 are subject to 40 CFR 60 Subpart WWW and certain sections of 40 CFR 63 Subparts AAAA and ZZZZ adopted by the Department at Rule 62-204.800(8)(b) and 62-204.800(11)(b), F.A.C.
[Rules 62-204.800 and 62-210.300, F.A.C.]

B5. The permittee shall operate each engine at the air-to-fuel ratio that the tested engine demonstrated compliance during the most recent performance test.
[Rule 62-212.400, F.A.C.]

B6. The permittee shall operate each engine within 0.5% of the O₂ content in the exhaust gas at the air-to-fuel ratio that the tested engine demonstrated compliance during the most recent performance test.
[Rule 62-212.400, F.A.C.]

B7. The permittee shall install and maintain an automatic fail-safe block valve on each engine. The fail-safe block valve must stop the flow of LFG in the event of an engine failure.

[Rule 62-4.070, F.A.C.]

B8. Excess LFG not used as fuel in an engine must be flared in accordance with the requirements of 40 CFR 60 Subpart WWW.

[Rule 62-4.070, F.A.C.]

B9. The emissions units shall be subject to the following:

- a. Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational 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. [Rule 62-210.700, F.A.C.]
- b. 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, F.A.C.]
- c. In case of excess emissions resulting from malfunctions, each source shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700, F.A.C.]

B10. Nitrogen oxides (NO_x): The emission rate of NO_x from each engine/generator set exhaust shall not exceed 0.60 gram per brake horsepower hour (g/bhp-hr) and a maximum of 2.95 pounds per hour (lb/hr) and 12.94 tons per year (TPY).

[Rule 62-212.400(12), F.A.C.]

B11. Carbon Monoxide (CO): The emission rate of CO from each engine/generator set exhaust shall not exceed 2.75 g/bhp-hr and a maximum of 13.54 lb/hr and 59.30 TPY.

[Rule 62-212.400(12), F.A.C.]

B12. Particulate Matter less than 10 microns (PM₁₀): The emission rate of PM₁₀ from each engine/generator set exhaust shall not exceed 0.24 g/bhp-hr and a maximum of 1.18 lb/hr and 5.17 TPY.

[Rule 62-212.400(12), F.A.C.]

B13. Volatile Organic Compounds (VOC): The emission rate of total VOC from each engine/generator set exhaust shall not exceed 0.28 g/bhp-hr and a maximum of 1.37 lb/hr and 5.99 TPY.

[Rule 62-212.400(12), F.A.C.]

{Permitting Note: Project avoids PSD review for VOC based on emission limits.}

B14. Hydrogen Chloride (HCl): The emission rate of HCl from each engine/generator set shall not exceed 10.9 lb/MMscf and 1.66 TPY.

[Rule 62-210.200(184), F.A.C.]

{Permitting Note: Facility remains a minor source of HAP emissions based on permit limits.}

B15. Sulfur Dioxide (SO₂): The emission rate of SO₂ from each engine/generator set shall not exceed 27.5 lb/MMscf.

[Rule 62-212.400(12), F.A.C.]

{Permitting Note: Project avoids PSD review based on permit limits.}

B16. Visible emissions from each engine/generator set exhaust shall not exceed 10% opacity.
[Rule 62-212.400, F.A.C.]

Test Methods and Procedures

B17. Performance Test Methods

Initial (I), Annual (A) and permit renewal (R) compliance tests shall be performed in accordance with the following reference methods as described in 40 CFR 60, Appendix A and 40 CFR 51 Appendix M, adopted by reference in Chapter 62-204.800, F.A.C. Initial, annual and renewal compliance tests shall be conducted on only one of the six engines. A different engine shall be tested each year such that all engines are tested during the six-year cycle.

- (a) EPA Method 7 or 7E – Determination of NO_x Emissions from Stationary Sources (I,A);
- (b) EPA Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources (I,A);
- (c) EPA Method 10 – Determination of CO Emissions from Stationary Sources (I,A);
- (d) EPA Method 18, 25, 25A or 25C – Measurement of Gaseous Organic Compounds Emissions (I,R);
- (e) EPA Method 26 or 26A – Determination of HCl Emissions from Stationary Sources (I,A);
- (f) EPA Method 201 – Determinations of PM₁₀ Emissions (I,A)

EPA Methods 1 through 4 shall be used as necessary to support other test methods. No other test methods may be used for compliance testing unless prior DEP approval is received, in writing, from the Department.

[Rule 62-297.310(7), F.A.C.]

B18. The permittee shall comply with the following requirements to monitor the sulfur and chlorine content of the landfill gas:

- a. The permittee shall sample and analyze the landfill gas for sulfur and chlorine content. The gas sample collected for the analyses shall be a composite sample and collected under normal operating conditions (i.e., with valves open for all operating cells). The gas sample collection and analyses for sulfur and chlorine content shall be done semi-annually. Based on the sampling results and Rule 62-297.310(7)(b), F.A.C., the Department may request additional gas sampling and analyses. Results shall be reported as SO₂ and HCl emission factors in terms of lb/MMscf of landfill gas.
- b. During each required compliance test conducted for HCl, the permittee shall sample and analyze the landfill gas for the chlorine content. Results for the compliance test shall be reported in terms of HCl emissions in lb/hr and the sample analysis result shall be reported as HCl emission factor in terms of lb/MMscf of landfill gas.
- c. Analysis of the chlorine content shall be used to track changes in the landfill gas. Based on the analysis, the Compliance Authority may require additional stack testing for HCl emissions to determine compliance with the emissions standard.
- d. Compliance with the fuel sulfur specification shall be determined based on each analysis for the sulfur content of the landfill gas.

[Rules 62-210.200(184), 62-210.200(232) and 62-212.400(12), F.A.C.]

B19. Annually, the subject emissions units shall be tested as required for compliance with the applicable emission limits. For the duration of all tests the emission units shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may

be tested at less than permitted capacity (i.e., 90% of the maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load

until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.

[Rule 62-297.310, F.A.C.]

Recordkeeping, Reporting, and Monitoring Requirements

B20. Total landfill gas flow to the engines shall be continuously measured and recorded.

[Rule 62-210.200 (232), F.A.C.]

B21. Gross electrical power generation (kw-hrs) shall be continuously measured and recorded for each engine individually and for the four engines combined.

[Rule 62-210.200(232), F.A.C.]

B22. Each engine/generator set shall be equipped with a non-resetable elapsed time meter to indicate, in cumulative hours, the elapsed engine operating time.

[Rule 62-210.200(232), F.A.C.]

B23. The permittee shall maintain the following records on a monthly basis:

- a. The hours of operation of each engine/generator set, including any start-up, shutdown or malfunction in the operations of the engine/generator set.
- b. The total landfill gas flow to each engine.
- c. Gross electrical power generation in kw-hr for each engine and the six engines combined.

[Rule 62-210.200(232), F.A.C.]

B24. The permittee shall submit the results and the corresponding data of the site-specific HCl emission factor and the SO₂ emission factor within 45 days of gas sampling to the Bureau of Air Regulation. The results shall also be submitted to the Central District Office.

[Rules 62-210.200(232) and 62-210.200(264), F.A.C.]

B25. The permittee shall notify the Central District Office of the DEP, in writing, at least 15 days prior to the date on which the formal compliance test is to begin. The notification shall include the date, time and place of each such test, as well as the name of the contact person who will be responsible for coordinating and having such tests conducted for the owner.

[Rule 62-297.310(7)(a)9., F.A.C.]

B26. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

[Rule 62-297.310(8)(b), F.A.C.]

B27. In order to demonstrate compliance with condition number **B10** through **B15**, the permittee shall maintain a log at the facility for a period of at least five years from the date the data is recorded. The log shall contain the monthly emission rates of the specified pollutants.

[Rules 62-4.070(3), and 62-213.440(1)(b)2.b., F.A.C.]

B28. Each emission unit is subject to the applicable requirements from title 40 of the CFR Part 63, Subpart ZZZZ (see attached Appendix F).

[Rule 62-204.800, F.A.C.]

Seminole County
Osceola Road Solid Waste Management Facility

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Facility ID No.: 1170084