

**Indian River County, Florida  
Solid Waste Disposal District  
Board Memorandum**

**Date:** July 1, 2021

**To:** Jason E. Brown, County Administrator

**From:** Matthew Jordan, Interim Director of Utility Services

**Prepared By:** Himanshu H. Mehta, PE, Managing Director, Solid Waste Disposal District

**Subject:** Work Order No. 13 to Geosyntec for Title V Air Operations Permit Renewal

**Descriptions and Conditions:**

The Title V air operation permit includes all the Clean Air Act requirements for identification and control of air pollutants and is required for all major sources of air pollutants. The United States Environmental Protection Agency (USEPA) has authorized the Florida Department of Environmental Protection (FDEP) to administer the Title V permitting program in the state of Florida. The FDEP has categorized the Indian River County Landfill (IRCL) as a major source requiring a Title V air operation permit, which must be renewed every five years. The IRCL's current five-year permit (Permit No. 0610015-007-AV) will expire on June 1, 2022, with the renewal application due on October 19, 2021.

The USEPA published in the Federal Register, dated May 21, 2021, a new federal plan known as 40 Code of Federal Regulations (CFR) 62, Subpart OOO. This Federal Plan implements the 2016 emission guidelines for existing Municipal Solid Waste (MSW) landfills in 40 CFR Part 60, Subpart Cf that are located in states that did not have approved and effective state plans. This federal plan became effective on June 21, 2021, and applies to MSW landfills that commenced construction, modification, or reconstruction on or before July 17, 2014, and have not been modified (i.e., increase in permitted volume design capacity through vertical or horizontal expansion) since July 17, 2014. One of the significant changes to the National Security Personnel System (NSPS) requirements under 40 CFR 60, Subparts XXX and Cf, and 40 CFR 62, Subpart OOO, is to reduce the non-methane organic compounds (NMOC) emission threshold from 50 megagrams per year (Mg/yr) to 34 Mg/yr. Facilities that exceed the new threshold are required to purchase, install, and operate a gas collection and control system (GCCS). The new rule also requires the submission of the following reports to the USEPA no later than September 20, 2021: (i) Design Capacity report; and (ii) NMOC emission rate report.

Based on our preliminary understanding and interpretation of the latest federal plan, the IRCL facility will be subject to Subpart OOO, including a lowered NMOC emission threshold and requirement to submit to USEPA the above two reports. A new source performance standards (NSPS) Tier 2 NMOC emissions rate report was prepared and submitted to FDEP as part of the Title V air operation permit renewal application in December 2016. A Title V air operation permit revision application was submitted in November 2018 to incorporate two emergency standby generator units that were installed later on. A similar Tier 2 testing previously conducted for the December 2016 application will be performed to estimate the site-specific NMOC concentration to recalculate and submit a Tier 2 NMOC emission rate report as part of this 2021 permit renewal application in addition to the submittal required by USEPA.

**Analysis:**

Geosyntec has prepared CCNA-2018 Work Order No. 11, provided in Attachment 1, for engineering and permitting services detailing the scope of work, budget, and schedule for each of the phases. The fees to be paid by the Solid Waste Disposal District (SWDD) for the execution of this work authorization are in accordance with the engineer's continuing consulting services master agreement. The phases are listed below, showing their estimated fees.

<b>PHASE</b>	<b>DESCRIPTION</b>	<b>AMOUNT</b>
Phase 1	General Consulting/Meeting Support/Project Management	\$ 14,054
Phase 2	Design Capacity and NMOC Emission Rate Reports	\$ 18,564
Phase 3	Title V Permit Renewal Application	\$ 31,717
Phase 4	Response and Regulatory Comments	\$ 6,863
TOTAL (Lump Sum) =		\$ 71,198

**Funding:**

Funding of \$71,198 for the engineering services needed to complete the permitting project is budgeted and is available in the Engineering Services account in the SWDD Landfill fund, which is funded from SWDD assessments and user fees.

<b>Description</b>	<b>Account Number</b>	<b>Amount</b>
Engineering Services	41121734-033130	\$71,198

**Recommendation:**

Solid Waste Disposal District (SWDD) staff recommends that its Board approve the following:

- a) Approve Work Order No. 13 with Geosyntec for \$71,198 to provide engineering services for preparation and submittal to the Florida Department of Environmental Protection an application for renewal of the Title V air operation permit.
- b) Authorize the Chairman to execute the same, as presented.

**Attachment (s):**

Work Order No. 13 – Geosyntec