CS-07-72

Golder Associates Inc.

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VIA EMAIL ONLY

February 26, 2007 993-3928.62

Nassau County Board of County Commissioners
96160 Nassau Place
Yulee, Florida 32097

Attention: Commissioner Jim B. Higginbotham, Chairman

RE: REQUEST FOR SIGNATURES
TITLE V AIR PERMIT ANNUAL REPORTS
WEST NASSAU LANDFILL
NASSAU COUNTY, FLORIDA

Dear Commissioner Higginbotham:

Golder Associates Inc. (Golder) has prepared the Title V Air Permit annual reports for the West Nassau Landfill in Nassau County, Florida. These reports include the Annual Operating Report (AOR), the Statement of Compliance (SOC), and the Fee Statement. These annual reports are required by the site's Title V permit to be submitted to the Florida Department of Environmental Protection (FDEP) by March 1, 2007. Golder is requesting that the Chairman of the Nassau County Board of County Commissioners (Board), being designated as the Responsible Official under the site's Title V Permit, sign the appropriate pages in these reports; one signature in each report as shown by name and/or Responsible Official.

Golder apologizes for the lateness of this request. We have been working diligently on these reports as well as getting the landfill gas expansion system into compliance, and the requirement for your signatures was overlooked. If you have any questions regarding this request or the reports themselves, please do not hesitate to call.

Sincerely,

GOLDER ASSOCIATES INC.

Wendy D. Karably
Senior Consultant/Associate

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APPROVED
DATE 2/26/07 BKS

Department of Environmental Protection

Division of Air Resources Management

ANNUAL OPERATING REPORT FOR AIR POLLUTANT EMITTING FACILITY

See Instructions for Form No. 62-210.900(5)

I. FACILITY REPORT

A. REPORT INFORMATION

1. Year of Report	2. Number of Emissions Units in Report
2006	2

B. FACILITY INFORMATION

1. Facility ID	2. Facility Status	3. Date of Permanent Facility Shutdown
0890428	ACTIVE	

4. Facility Owner/Company Name
NASSAU CO. BOARD OF COUNTY COMMISSIONERS

5. Site Name
WEST NASSAU LANDFILL

6. Facility Location
Street Address or Other Locator: 46026 LANDFILL ROAD
City: CALLAHAN County: NASSAU Zip Code: 32011

7. Facility Compliance Tracking Code	8. Governmental Facility Code	9. Facility SIC(s)
A	3	4953

10. Facility Comment
The facility is a Title V facility by EPA designation. However, potential emissions from the landfill gas flare are greater than Title V threshold.

C. FACILITY HISTORY INFORMATION

1. Change in Facility Owner/ Company Name During Year?	Previous Name	2. Date of Change

Facility ID : 0890428

D. OWNER/CONTACT INFORMATION

1. Owner or Authorized Representative

Name and Title

JIM B. HIGGINBOTHAM

CHAIRMAN OF COUNTY COMMISSIONERS

Mailing Address

Organization/Firm: **NASSAU COUNTY BOARD OF COUNTY COMMISSIONERS**

Street Address: **96160 NASSAU PLACE**

City: **YULEE**

State: **FL** Zip Code: **32097**

Telephone: **(904) 491-7380** Ext. Fax: **(904) 321-5784**

Email (optional):

2. Facility Contact

Name and Title

LEE PICKETT

INTERIM SOLID WASTE DIRECTOR

Mailing Address

Organization/Firm: **WEST NASSAU LANDFILL**

Street Address: **46026 LANDFILL ROAD**

City: **CALLAHAN**

State: **FL** Zip Code: **32011**

Telephone: **(904) 879-6321** Ext. Fax: **(904) 879-6323**

Email (optional): **lpickett@nassaucountyfl.com**

E. OWNER OR AUTHORIZED REPRESENTATIVE STATEMENT

I hereby certify that the information given in this report is correct to the best of my knowledge.

Signature 2-26-07

Date

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description **Municipal Solid Waste Landfill**		
2. Emissions Unit ID **001**	3. Emissions Unit Classification **Regulated Emissions Unit**	4. Operated During Year? **Y**
5. DEP Permit or PPS Number **0890428005AV**	6. Emissions Unit Status **ACTIVE**	7. Ozone SIP Base Year Emissions Unit? **Y**
8. Emissions Unit Startup Date **January 01, 1974**	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emissions Point Type **NO TRUE EMISSION POINT (FUGITIVE EMISSION)**
2a. Description of Control Equipment 'a'
2b. Description of Control Equipment 'b'

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation hours/day **24** days/week **7**	2. Total Operation During Year (hours/year) **8760**
3. Percent Hours of Operation by Season DJF : **25** MAM : **25** JJA : **25** SON : **25**	
4. Average Ozone Season Operation (June 1 to August 31) hours/day **24** days/week **7**	5. Total Operation During Ozone Season (days/season) **92**

D. EMISSIONS UNIT COMMENT

Emission estimates represent fugitive emissions of landfill gases based on an average landfill gas Collection and control system (GCCS) collection efficiency (LGCS) of 75% and 41% of coverage of the GCCS. To estimate landfill gas emissions, the US EPA LandGEM Model (Version 3.02) was used. All parameters werre default valuesa with the exception of the concentration of NMOCs. This value was taken from Tier 2 testing performed at the facility in 2004.

E. EMISSIONS INFORMATION BY PROCESS/FUEL

(1) PROCESS/FUEL INFORMATION

1. SCC	2. Description of Process or Type of Fuel	
5-01-004-02	**Waste Disposal** **Solid Waste Disposal - Government**	**Landfill Dump** **Fugitive Emissions**
3. Annual Process or Fuel Usage Rate **60**	4. Ozone Season Daily Process or Fuel Usage Rate	5. SCC Unit **Acre-Years Landfill Existing**
6. Fuel Average % Sulfur	7. Fuel Average % Ash	8. Fuel Heat Content (mmBtu/SCC Unit)

(2) EMISSIONS INFORMATION

1. Pollutant **CO** **Carbon Monoxide**	CAS No. **630-08-0**	[ ] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **1.9**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1. Pollutant **HAPS** **Total Hazardous Air Pollutants**	CAS No.	[ ] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **4.9**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1. Pollutant **NMOC** **Nonmethane Organic Compounds from MSW Landfill**	CAS No.	[ ] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **24.8**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

*: Pollutant subject to emissions limiting standard or emissions cap

1. Pollutant **VOC** **Volatile Organic Compounds**	CAS No.	[ ] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code
7.7		3
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

*: Pollutant subject to emissions limiting standard or emissions cap

II. EMISSIONS UNIT REPORT

A. EMISSIONS UNIT INFORMATION

1. Emissions Unit Description		
LANDFILL GAS UTILITY FLARE		
2. Emissions Unit ID **002**	3. Emissions Unit Classification **Regulated Emissions Unit**	4. Operated During Year? **Y**
5. DEP Permit or PPS Number **0890428005AV**	6. Emissions Unit Status **ACTIVE**	7. Ozone SIP Base Year Emissions Unit? **N**
8. Emissions Unit Startup Date **February 28, 2002**	9. Long-term Reserve Shutdown Date	10. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emissions Point Type
SINGLE POINT SERVING A SINGLE EMISSIONS UNIT
2a. Description of Control Equipment 'a'
2b. Description of Control Equipment 'b'

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation	2. Total Operation During Year (hours/year)
hours/day **24** days/week **7**	**8760**
3. Percent Hours of Operation by Season	
DJF : **25** MAM : **25** JJA : **25** SON : **25**	
4. Average Ozone Season Operation (June 1 to August 31)	5. Total Operation During Ozone Season (days/season)
hours/day **24** days/week **7**	**92**

*: Pollutant subject to emissions limiting standard or emissions cap

D. EMISSIONS UNIT COMMENT

Fuel heat value for landfill gas burned by the flare represents an industry average as reported by the facility. Fuel heat value for propane represents an industry average as reported by the National Propane Gas Association.

SCC 5-01-900-10 (flare auxilary fuel) description is considered to be an insignificant source of emissions due to the fact that it is only used during startup o the flare. The flare uses on average less than 200 lbs of propane per year, which would classufy this as exempt under 62-210.300(3)b.

*: Pollutant subject to emissions limiting standard or emissions cap

E. EMISSIONS INFORMATION BY PROCESS/FUEL

(1) PROCESS/FUEL INFORMATION

1. SCC	2. Description of Process or Type of Fuel	
5-01-004-10	**Waste Disposal** **Solid Waste Disposal - Government**	**Landfill Dump** **Waste Gas Destruction: Waste**
3. Annual Process or Fuel Usage Rate **435**	4. Ozone Season Daily Process or Fuel Usage Rate **1.19**	5. SCC Unit **Million Cubic Feet Waste Gas Burned**
6. Fuel Average % Sulfur	7. Fuel Average % Ash	8. Fuel Heat Content (mmBtu/SCC Unit) **500**

(2) EMISSIONS INFORMATION

1. Pollutant **CO** **Carbon Monoxide**	CAS No. **630-08-0**	[ ] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **163.2**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations) **Emissions calculations presented in attached Table 2.** **Emission Factor Reference: AP-42 Table 2.4-5.**		

1. Pollutant **HAPS** **Total Hazardous Air Pollutants**	CAS No.	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **0.05**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations) **Emissions calculations presented in attached Table 2.**		

1. Pollutant **NMOC** **Nonmethane Organic Compounds from MSW Landfill**	CAS No.	[ ] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **0.22**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations) **Emissions calculations presented in attached Table 2.**		

*: Pollutant subject to emissions limiting standard or emissions cap

1. Pollutant **NOX** **Nitrogen Oxides**	CAS No. **10102-44-0**	[ ] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **8.7**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**

5. Emissions Calculation (Show separately both annual and daily emissions calculations)

Annual Emissions (Tons/Year) 8.7 = Emission Factor (Lbs/Million Cubic Feet Waste Gas Burned) 40 * Annual Process or Fuel Usage Rate (Million Cubic Feet Waste Gas Burned) 435 / 2000

Emissions calculations presented in attached Table 2.

Emission Factor Reference: AP-42 Table 2.4-5.

Ozone season calculations not required because the facility is not located within an ozone NA or AQM area and does not have the PTE of greater than or equal to 100 TPY of VOC or NOx.

1. Pollutant **PM** **Particulate Matter - Total**	CAS No.	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **3.6975**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**

5. Emissions Calculation (Show separately both annual and daily emissions calculations)

Annual Emissions (Tons/Year) 3.6975 = Emission Factor (Lbs/Million Cubic Feet Waste Gas Burned) 17 * Annual Process or Fuel Usage Rate (Million Cubic Feet Waste Gas Burned) 435 / 2000

Emissions calculations presented in attached Table 2.

Emission Factor Reference: AP-42 Table 2.4-5.

1. Pollutant **PM10** **Particulate Matter - PM10**	CAS No.	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **3.6975**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**

5. Emissions Calculation (Show separately both annual and daily emissions calculations)

PM10 emission is assumed to be the same as PM.

*: Pollutant subject to emissions limiting standard or emissions cap

1. Pollutant **SO2** **Sulfur Dioxide**	CAS No. **7446-09-5**	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **1.2615**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**

5. Emissions Calculation (Show separately both annual and daily emissions calculations)

Annual Emissions (Tons/Year) 1.2615 = Emission Factor (Lbs/Million Cubic Feet Waste Gas Burned) 5.8 * Annual Process or Fuel Usage Rate (Million Cubic Feet Waste Gas Burned) 435 / 2000

Emissions calculations presented in attached Table 2.

Emission Factor Reference: AP-42 Table 2.4-5.

1. Pollutant **VOC** **Volatile Organic Compounds**	CAS No.	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year) **0.07**	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**

5. Emissions Calculation (Show separately both annual and daily emissions calculations)

Emissions calculations presented in attached Table 2.

Emissions calculated based on LandGem modeling estimates.

Ozone season calculations not required because the facility is not located within an ozone NA or AQM area and does not have the PTE of greater than or equal to 100 TPY of VOC or NOx.
Emissions calculations presented in attached Table 2.

Ozone season calculations not required because the facility is not located within an ozone NA or AQM area and does not have the PTE of greater than or equal to 100 TPY of VOC or NOx

*: Pollutant subject to emissions limiting standard or emissions cap

E. EMISSIONS INFORMATION BY PROCESS/FUEL

(1) PROCESS/FUEL INFORMATION

1. SCC	2. Description of Process or Type of Fuel	
5-01-900-10	**Waste Disposal** **Solid Waste Disposal - Government**	**Auxillary Fuel/No Emissions** **Liquified Petroleum Gas (LPG)**
3. Annual Process or Fuel Usage Rate **0.01**	4. Ozone Season Daily Process or Fuel Usage Rate **0.0035**	5. SCC Unit **1000 Gallons Liquified Petroleum Gas (LPG)**
6. Fuel Average % Sulfur	7. Fuel Average % Ash	8. Fuel Heat Content (mmBtu/SCC Unit) **92**

(2) EMISSIONS INFORMATION

1. Pollutant **CO** **Carbon Monoxide**	CAS No. **630-08-0**	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1. Pollutant **HAPS** **Total Hazardous Air Pollutants**	CAS No.	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1. Pollutant **NMOC** **Nonmethane Organic Compounds from MSW Landfill**	CAS No.	[ ] Below Threshold [X] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

*: Pollutant subject to emissions limiting standard or emissions cap

1. Pollutant **NOX** **Nitrogen Oxides**	CAS No. **10102-44-0**	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1. Pollutant **PM** **Particulate Matter - Total**	CAS No.	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1. Pollutant **PM10** **Particulate Matter - PM10**	CAS No.	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1. Pollutant **SO2** **Sulfur Dioxide**	CAS No. **7446-09-5**	[X] Below Threshold [ ] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code **3**
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1. Pollutant **VOC** **Volatile Organic Compounds**	CAS No.	[ ] Below Threshold [X] Not Emitted
2. Annual Emissions (ton/year)	3. Ozone Season Daily Emissions (lb/day)	4. Emissions Method Code
5. Emissions Calculation (Show separately both annual and daily emissions calculations)		

*: Pollutant subject to emissions limiting standard or emissions cap

TABLES

(Uploaded and Submitted with EAOR)

Revised Table 1
Summary of LANDGEM Model Results
2005 AOR
West Nassau Class I Landfill
Facility Id. No. 0890428

Gas/Pollutant	2006 Emission Rate	
	(Mg/year)	*(short tons/year)*
Total landfill gas	1.923E+04	2.116E+04
Methane	5.137E+03	5.651E+03
NMOC	3.259E+01	3.585E+01
Carbon monoxide	2.512E+00	2.763E+00
1,1,1-Trichloroethane (methyl chloroform) - HAP	4.102E-02	4.512E-02
1,1,2,2-Tetrachloroethane - HAP/VOC	1.183E-01	1.301E-01
1,1-Dichloroethane (ethylidene dichloride) - HAP/VOC	1.522E-01	1.674E-01
1,1-Dichloroethene (vinylidene chloride) - HAP/VOC	1.242E-02	1.366E-02
1,2-Dichloroethane (ethylene dichloride) - HAP/VOC	2.599E-02	2.859E-02
1,2-Dichloropropane (propylene dichloride) - HAP/VOC	1.303E-02	1.433E-02
2-Propanol (isopropyl alcohol) - VOC	1.925E+00	2.118E+00
Acrylonitrile - HAP/VOC	2.141E-01	2.355E-01
Benzene - No or Unknown Co-disposal - HAP/VOC	9.507E-02	1.046E-01
Bromodichloromethane - VOC	3.253E-01	3.579E-01
Butane - VOC	1.862E-01	2.048E-01
Carbon disulfide - HAP/VOC	2.829E-02	3.111E-02
Carbon tetrachloride - HAP/VOC	3.942E-04	4.336E-04
Carbonyl sulfide - HAP/VOC	1.886E-02	2.074E-02
Chlorobenzene - HAP/VOC	1.803E-02	1.983E-02
Chloroethane (ethyl chloride) - HAP/VOC	5.373E-02	5.910E-02
Chloroform - HAP/VOC	2.294E-03	2.524E-03
Chloromethane - VOC	3.881E-02	4.269E-02
Dichlorobenzene - (HAP for para isomer/VOC)	1.977E-02	2.175E-02
Dichlorofluoromethane - VOC	1.714E-01	1.886E-01
Dichloromethane (methylene chloride) - HAP	7.618E-01	8.379E-01
Dimethyl sulfide (methyl sulfide) - VOC	3.104E-01	3.415E-01
Ethanol - VOC	7.970E-01	8.767E-01
Ethyl mercaptan (ethanethiol) - VOC	9.154E-02	1.007E-01
Ethylbenzene - HAP/VOC	3.128E-01	3.441E-01
Ethylene dibromide - HAP/VOC	1.204E-04	1.324E-04
Fluorotrichloromethane - VOC	6.688E-02	7.357E-02
Hexane - HAP/VOC	3.644E-01	4.008E-01
Mercury (total) - HAP	3.727E-05	4.099E-05
Methyl Ethyl Ketone - VOC	3.280E-01	3.608E-01
Methyl isobutyl ketone - HAP/VOC	1.219E-01	1.341E-01
Methyl mercaptan - VOC	7.705E-02	8.475E-02
Pentane - VOC	1.525E-01	1.678E-01
Perchloroethylene (tetrachloroethylene) - HAP	3.930E-01	4.323E-01
Propane - VOC	3.107E-01	3.417E-01
t-1,2-Dichloroethene - VOC	1.739E-01	1.913E-01

Revised Table 1
Summary of LANDGEM Model Results
2005 AOR
West Nassau Class I Landfill
Facility Id. No. 0890428

Gas/Pollutant	2006 Emission Rate	
	(Mg/year)	*(short tons/year)*
Toluene - No or Unknown Co-disposal - HAP/VOC	2.302E+00	2.532E+00
Trichloroethylene (trichloroethene) - HAP/VOC	2.357E-01	2.593E-01
Vinyl chloride - HAP/VOC	2.923E-01	3.215E-01
Xylenes - HAP/VOC	8.161E-01	8.977E-01
TOTAL UNCONTROLLED VOCs	10.2	11.2
TOTAL HAPs	6.4	7.1
TOTAL UNCONTROLLED NMOCs	32.6	35.9

Notes:

[1]Based on the EPA Landfill Gas Emissions (LandGEM) model version 3.02 results.

Default model parameters are as follows:

Lo-methane generation potential = 100 m^3/Mg (AP-42, 2.4.4.1)

k-methane generation rate constant = 0.04/yr (AP-42, 2.4.4.1)

NMOC concentration = 590.4 ppmv (2004 Tier II test data)

VOC-Volatile Organic Compound

NMOC-Non-Methane Organic Compound

HAP-Hazardous Air Pollutant

Table 2
Emission Calculations
2006 AOR
West Nassau Class I Landfill
Facility ID No. 0890428

Parameter	NMOC	HAP	VOC	CO	NOx	PM	SO2	Units	Reference
Uncontrolled Emissions	35.85	7.05	11.19	2.76	N/A	N/A	N/A	ton/year	LandGEM model results, see Table 1
LGCS Area Coverage[5]	41	41	41	41	N/A	N/A	N/A	%	Construction Drawings
LGCS Collection Efficiency	75	75	75	75	N/A	N/A	N/A	%	Average, EPA AP-42, Chapter 2.4.4.2
Collected Emissions (to be burned by the flare)	11.0	2.2	3.4	0.8	N/A	N/A	N/A	ton/year	Calculated[1]
Total Fugitive Landfill Emissions (EU 001)	**24.8**	**4.9**	**7.7**	**1.9**	N/A	N/A	N/A	ton/year	Calculated[2]
Flare Destruction Efficiency	98	98	98	98	N/A	N/A	N/A	%	Facility Data[3]
Total Waste Gas Generated	N/A	N/A	N/A	435	435	435	435	10^6 dscf	2006 Facility Data
Emission Factor	N/A	N/A	N/A	750	40	17	5.8	lb/10^6dscf	AP-42, Table 2.4-5 (CO, NOx, PM) EPA FIRE (SO_2)
Total Flare Emissions (EU 002)	**0.22**	**0.04**	**0.07**	**163.1**	**8.70**	**3.7**	**1.3**	ton/year	Calculated[4]

Notes:

[1]Controlled Emissions (to be burned by flare) = [GCCS area coverage * GCCS collection efficiency *uncontrolled emissions]

[2]Total Fugitive Landfill Emissions = [Uncontrolled Emissions - Controlled Emissions]

[3]HAPs are predominantly VOCs; therefore, 98% flare destruction efficiency was assumed to be reasonable.

[4]Total (VOC, NMOC, HAP, CO) Flare Emissions = [controlled emissions * (1-flare destruction efficiency/100)]

[4]Total (CO, NOx, PM, SO_2) Flare Emissions = [(emission factor) * (waste gas generated) * (1 ton/2000 lb)]

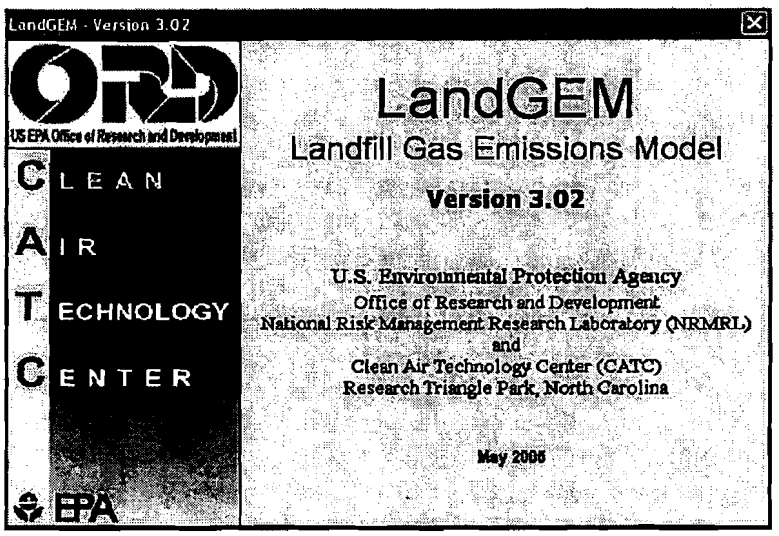
[5]GCCS coverage is 21.5 acres. Site area with waste in place for $\geq$ 2 years is 53.5 acres, which yields 41% coverage.

Emissions associated with firing the flare with propane (auxiliary fuel) are considered negligible and not accounted for in the emission estimates.

VOC-Volatile Organic Compounds
NMOC-Non-Methane Organic Compounds
CO-Carbon Monoxide
NOx-Nitrogen Oxides
PM-Particulate Matter
SO_2-Sulfur Dioxide
GCCS-Landfill Gas Collection and Control System

ATTACHMENT A

2006 AOR Support Data
LandGEM Modeling Results
(Not Submitted with EAOR)



Summary Report

Landfill Name or Identifier: West Nassau Landfill

Date: Monday, February 26, 2007

Description/Comments:

About LandGEM:

First-Order Decomposition Rate Equation: $$Q_{CH_4} = \sum_{i=1}^{n} \sum_{j=0.1}^{1} kL_o \left(\frac{M_i}{10}\right) e^{-kt_{ij}}$$

Where,

Q_{CH4} = annual methane generation in the year of the calculation ($m^3/year$)

i = 1-year time increment

n = (year of the calculation) - (initial year of waste acceptance)

j = 0.1-year time increment

k = methane generation rate ($year^{-1}$)

L_o = potential methane generation capacity (m^3/Mg)

M_i = mass of waste accepted in the i^{th} year (Mg)

t_{ij} = age of the j^{th} section of waste mass M_i accepted in the i^{th} year (*decimal years*, e.g., 3.2 years)

LandGEM is based on a first-order decomposition rate equation for quantifying emissions from the decomposition of landfilled waste in municipal solid waste (MSW) landfills. The software provides a relatively simple approach to estimating landfill gas emissions. Model defaults are based on empirical data from U.S. landfills. Field test data can also be used in place of model defaults when available. Further guidance on EPA test methods, Clean Air Act (CAA) regulations, and other guidance regarding landfill gas emissions and control technology requirements can be found at http://www.epa.gov/ttnatw01/landfill/landflpg.html.

LandGEM is considered a screening tool— the better the input data, the better the estimates. Often, there are limitations with the available data regarding waste quantity and composition, variation in design and operating practices over time, and changes occurring over time that impact the emissions potential. Changes to landfill operation, such as operating under wet conditions through leachate recirculation or other liquid additions, will result in generating more gas at a faster rate. Defaults for estimating emissions for this type of operation are being developed to include in LandGEM along with defaults for convential landfills (no leachate or liquid additions) for developing emission inventories and determining CAA applicability. Refer to the Web site identified above for future updates.

Input Review

LANDFILL CHARACTERISTICS

Landfill Open Year	1974	
Landfill Closure Year (with 80-year limit)	2016	
Actual Closure Year (without limit)	*2016*	
Have Model Calculate Closure Year?	No	
Waste Design Capacity		*megagrams*

MODEL PARAMETERS

Methane Generation Rate, k	0.040	$year^{-1}$
Potential Methane Generation Capacity, L_o	100	m^3/Mg
NMOC Concentration	590	*ppmv as hexane*
Methane Content	50	*% by volume*

GASES / POLLUTANTS SELECTED

Gas / Pollutant #1:	**Total landfill gas**
Gas / Pollutant #2:	**Methane**
Gas / Pollutant #3:	**Carbon dioxide**
Gas / Pollutant #4:	**NMOC**

WASTE ACCEPTANCE RATES

Year	Waste Accepted		Waste-In-Place	
	(Mg/year)	*(short tons/year)*	*(Mg)*	*(short tons)*
1974	23,422	25,765	0	0
1975	23,422	25,765	23,422	25,765
1976	23,422	25,765	46,845	51,529
1977	23,422	25,765	70,267	77,294
1978	23,422	25,765	93,690	103,059
1979	23,422	25,765	117,112	128,824
1980	23,422	25,765	140,535	154,588
1981	23,422	25,765	163,957	180,353
1982	23,422	25,765	187,380	206,118
1983	23,422	25,765	210,802	231,882
1984	23,422	25,765	234,225	257,647
1985	23,422	25,765	257,647	283,412
1986	23,422	25,765	281,070	309,176
1987	23,422	25,765	304,492	334,941
1988	23,422	25,765	327,914	360,706
1989	23,422	25,765	351,337	386,471
1990	23,422	25,765	374,759	412,235
1991	56,229	61,852	398,182	438,000
1992	56,229	61,852	454,411	499,852
1993	56,229	61,852	510,640	561,705
1994	56,029	61,632	566,870	623,557
1995	67,956	74,752	622,899	685,189
1996	280,044	308,049	690,855	759,940
1997	208,060	228,866	970,899	1,067,989
1998	189,215	208,137	1,178,960	1,296,855
1999	172,441	189,685	1,368,175	1,504,992
2000	155,665	171,232	1,540,616	1,694,677
2001	142,733	157,006	1,696,281	1,865,909
2002	183,819	202,201	1,839,014	2,022,915
2003	209,924	230,917	2,022,833	2,225,116
2004	222,535	244,789	2,232,758	2,456,033
2005	171,457	188,603	2,455,293	2,700,822
2006	143,517	157,869	2,626,750	2,889,425
2007	74,545	82,000	2,770,268	3,047,294
2008	76,364	84,000	2,844,813	3,129,294
2009	78,182	86,000	2,921,177	3,213,294
2010	80,000	88,000	2,999,358	3,299,294
2011	81,818	90,000	3,079,358	3,387,294
2012	83,636	92,000	3,161,177	3,477,294
2013	85,455	94,000	3,244,813	3,569,294

WASTE ACCEPTANCE RATES (Continued)

Year	Waste Accepted		Waste-In-Place	
	(Mg/year)	*(short tons/year)*	*(Mg)*	*(short tons)*
2014	87,273	96,000	3,330,268	3,663,294
2015	89,091	98,000	3,417,540	3,759,294
2016	26,364	29,000	3,506,631	3,857,294
2017	0	0	3,532,995	3,886,294
2018	0	0	3,532,995	3,886,294
2019	0	0	3,532,995	3,886,294
2020	0	0	3,532,995	3,886,294
2021	0	0	3,532,995	3,886,294
2022	0	0	3,532,995	3,886,294
2023	0	0	3,532,995	3,886,294
2024	0	0	3,532,995	3,886,294
2025	0	0	3,532,995	3,886,294
2026	0	0	3,532,995	3,886,294
2027	0	0	3,532,995	3,886,294
2028	0	0	3,532,995	3,886,294
2029	0	0	3,532,995	3,886,294
2030	0	0	3,532,995	3,886,294
2031	0	0	3,532,995	3,886,294
2032	0	0	3,532,995	3,886,294
2033	0	0	3,532,995	3,886,294
2034	0	0	3,532,995	3,886,294
2035	0	0	3,532,995	3,886,294
2036	0	0	3,532,995	3,886,294
2037	0	0	3,532,995	3,886,294
2038	0	0	3,532,995	3,886,294
2039	0	0	3,532,995	3,886,294
2040	0	0	3,532,995	3,886,294
2041	0	0	3,532,995	3,886,294
2042	0	0	3,532,995	3,886,294
2043	0	0	3,532,995	3,886,294
2044	0	0	3,532,995	3,886,294
2045	0	0	3,532,995	3,886,294
2046	0	0	3,532,995	3,886,294
2047	0	0	3,532,995	3,886,294
2048	0	0	3,532,995	3,886,294
2049	0	0	3,532,995	3,886,294
2050	0	0	3,532,995	3,886,294
2051	0	0	3,532,995	3,886,294
2052	0	0	3,532,995	3,886,294
2053	0	0	3,532,995	3,886,294

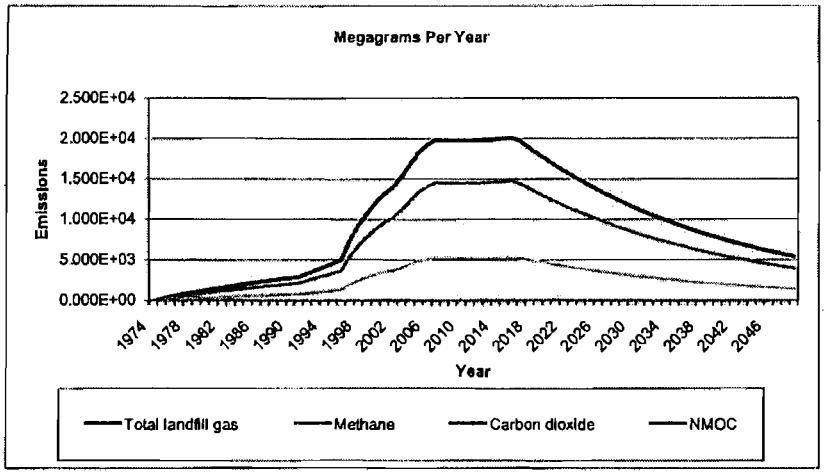
Pollutant Parameters

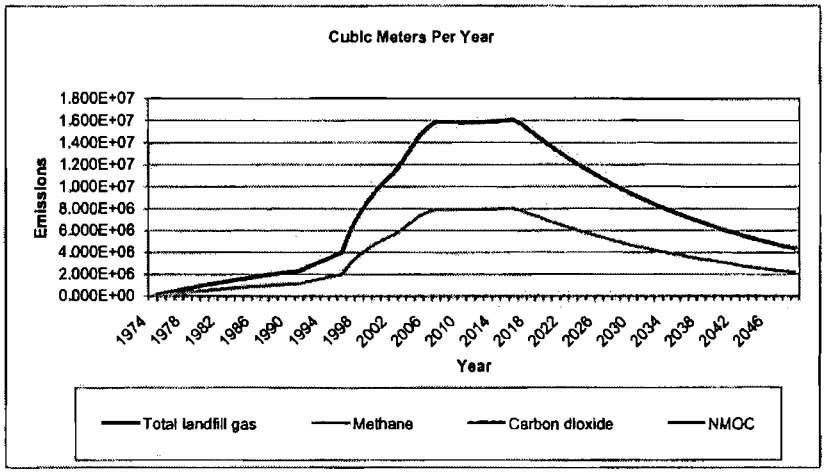
		Gas / Pollutant Default Parameters:		*User-specified Pollutant Parameters:*	
	Compound	Concentration (*ppmv*)	Molecular Weight	Concentration (*ppmv*)	Molecular Weight
Gases	Total landfill gas		0.00		
	Methane		16.04		
	Carbon dioxide		44.01		
	NMOC	4,000	86.18		
Pollutants	1,1,1-Trichloroethane (methyl chloroform) - HAP	0.48	133.41		
	1,1,2,2-Tetrachloroethane - HAP/VOC	1.1	167.85		
	1,1-Dichloroethane (ethylidene dichloride) - HAP/VOC	2.4	98.97		
	1,1-Dichloroethene (vinylidene chloride) - HAP/VOC	0.20	96.94		
	1,2-Dichloroethane (ethylene dichloride) - HAP/VOC	0.41	98.96		
	1,2-Dichloropropane (propylene dichloride) - HAP/VOC	0.18	112.99		
	2-Propanol (isopropyl alcohol) - VOC	50	60.11		
	Acetone	7.0	58.08		
	Acrylonitrile - HAP/VOC	6.3	53.06		
	Benzene - No or Unknown Co-disposal - HAP/VOC	1.9	78.11		
	Benzene - Co-disposal - HAP/VOC	11	78.11		
	Bromodichloromethane - VOC	3.1	163.83		
	Butane - VOC	5.0	58.12		
	Carbon disulfide - HAP/VOC	0.58	76.13		
	Carbon monoxide	140	28.01		
	Carbon tetrachloride - HAP/VOC	4.0E-03	153.84		
	Carbonyl sulfide - HAP/VOC	0.49	60.07		
	Chlorobenzene - HAP/VOC	0.25	112.56		
	Chlorodifluoromethane	1.3	86.47		
	Chloroethane (ethyl chloride) - HAP/VOC	1.3	64.52		
	Chloroform - HAP/VOC	0.03	119.39		
	Chloromethane - VOC	1.2	50.49		
	Dichlorobenzene - (HAP for para isomer/VOC)	0.21	147		
	Dichlorodifluoromethane	16	120.91		
	Dichlorofluoromethane - VOC	2.6	102.92		
	Dichloromethane (methylene chloride) - HAP	14	84.94		
	Dimethyl sulfide (methyl sulfide) - VOC	7.8	62.13		
	Ethane	890	30.07		
	Ethanol - VOC	27	46.08		

Pollutant Parameters (Continued)

		Gas / Pollutant Default Parameters:		*User-specified Pollutant Parameters:*	
	Compound	Concentration (*ppmv*)	Molecular Weight	Concentration (*ppmv*)	Molecular Weight
Pollutants	Ethyl mercaptan (ethanethiol) - VOC	2.3	62.13		
	Ethylbenzene - HAP/VOC	4.6	106.16		
	Ethylene dibromide - HAP/VOC	1.0E-03	187.88		
	Fluorotrichloromethane - VOC	0.76	137.38		
	Hexane - HAP/VOC	6.6	86.18		
	Hydrogen sulfide	36	34.08		
	Mercury (total) - HAP	2.9E-04	200.61		
	Methyl ethyl ketone - HAP/VOC	7.1	72.11		
	Methyl isobutyl ketone - HAP/VOC	1.9	100.16		
	Methyl mercaptan - VOC	2.5	48.11		
	Pentane - VOC	3.3	72.15		
	Perchloroethylene (tetrachloroethylene) - HAP	3.7	165.83		
	Propane - VOC	11	44.09		
	t-1,2-Dichloroethene - VOC	2.8	96.94		
	Toluene - No or Unknown Co-disposal - HAP/VOC	39	92.13		
	Toluene - Co-disposal - HAP/VOC	170	92.13		
	Trichloroethylene (trichloroethene) - HAP/VOC	2.8	131.40		
	Vinyl chloride - HAP/VOC	7.3	62.50		
	Xylenes - HAP/VOC	12	106.16		

Graphs


Megagrams Per Year
Emissions
2.500E+04
2.000E+04
1.500E+04
1.000E+04
5.000E+03
0.000E+00
1974 1978 1982 1986 1990 1994 1998 2002 2006 2010 2014 2018 2022 2026 2030 2034 2038 2042 2046
Year
Total landfill gas
Methane
Carbon dioxide
NMOC


Cubic Meters Per Year
Emissions
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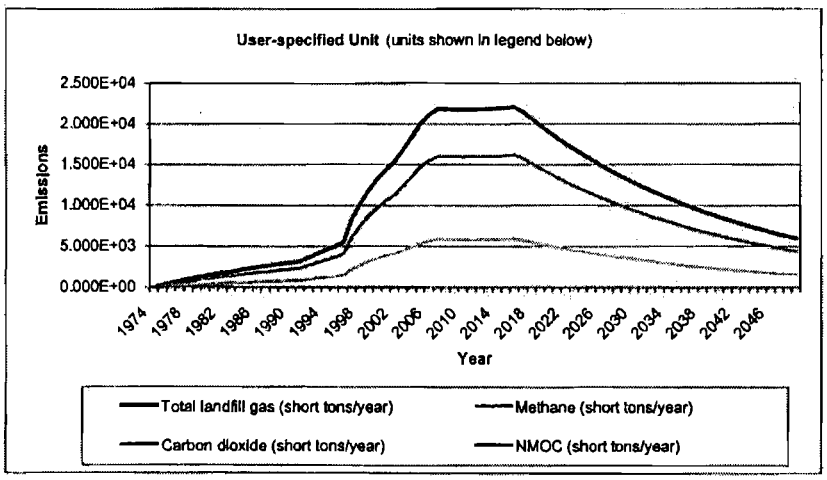
1.600E+07
1.400E+07
1.200E+07
1.000E+07
8.000E+06
6.000E+06
4.000E+06
2.000E+06
0.000E+00
1974 1978 1982 1986 1990 1994 1998 2002 2006 2010 2014 2018 2022 2026 2030 2034 2038 2042 2046
Year
Total landfill gas
Methane
Carbon dioxide
NMOC


User-specified Unit (units shown in legend below)
Emissions
2.500E+04
2.000E+04
1.500E+04
1.000E+04
5.000E+03
0.000E+00
1974 1978 1982 1986 1990 1994 1998 2002 2006 2010 2014 2018 2022 2026 2030 2034 2038 2042 2046
Year
Total landfill gas (short tons/year)
Methane (short tons/year)
Carbon dioxide (short tons/year)
NMOC (short tons/year)

Results

Year	Total landfill gas			Methane		
	(Mg/year)	(m^3/year)	(short tons/year)	(Mg/year)	(m^3/year)	(short tons/year)
1974	0	0	0	0	0	0
1975	2.298E+02	1.840E+05	2.528E+02	6.139E+01	9.202E+04	6.753E+01
1976	4.507E+02	3.609E+05	4.957E+02	1.204E+02	1.804E+05	1.324E+02
1977	6.629E+02	5.308E+05	7.291E+02	1.771E+02	2.654E+05	1.948E+02
1978	8.667E+02	6.940E+05	9.534E+02	2.315E+02	3.470E+05	2.547E+02
1979	1.063E+03	8.509E+05	1.169E+03	2.838E+02	4.254E+05	3.122E+02
1980	1.251E+03	1.002E+06	1.376E+03	3.341E+02	5.008E+05	3.675E+02
1981	1.432E+03	1.146E+06	1.575E+03	3.824E+02	5.732E+05	4.206E+02
1982	1.605E+03	1.285E+06	1.766E+03	4.288E+02	6.427E+05	4.717E+02
1983	1.772E+03	1.419E+06	1.949E+03	4.734E+02	7.095E+05	5.207E+02
1984	1.933E+03	1.547E+06	2.126E+03	5.162E+02	7.737E+05	5.678E+02
1985	2.087E+03	1.671E+06	2.295E+03	5.574E+02	8.354E+05	6.131E+02
1986	2.235E+03	1.789E+06	2.458E+03	5.969E+02	8.947E+05	6.566E+02
1987	2.377E+03	1.903E+06	2.615E+03	6.349E+02	9.516E+05	6.984E+02
1988	2.513E+03	2.013E+06	2.765E+03	6.714E+02	1.006E+06	7.385E+02
1989	2.645E+03	2.118E+06	2.909E+03	7.064E+02	1.059E+06	7.771E+02
1990	2.771E+03	2.219E+06	3.048E+03	7.401E+02	1.109E+06	8.142E+02
1991	2.892E+03	2.316E+06	3.181E+03	7.725E+02	1.158E+06	8.498E+02
1992	3.330E+03	2.667E+06	3.664E+03	8.896E+02	1.333E+06	9.786E+02
1993	3.752E+03	3.004E+06	4.127E+03	1.002E+03	1.502E+06	1.102E+03
1994	4.156E+03	3.328E+06	4.572E+03	1.110E+03	1.664E+06	1.221E+03
1995	4.543E+03	3.638E+06	4.998E+03	1.214E+03	1.819E+06	1.335E+03
1996	5.032E+03	4.029E+06	5.535E+03	1.344E+03	2.015E+06	1.478E+03
1997	7.583E+03	6.072E+06	8.341E+03	2.025E+03	3.036E+06	2.228E+03
1998	9.327E+03	7.469E+06	1.026E+04	2.491E+03	3.734E+06	2.740E+03
1999	1.082E+04	8.663E+06	1.190E+04	2.890E+03	4.331E+06	3.179E+03
2000	1.209E+04	9.678E+06	1.329E+04	3.228E+03	4.839E+06	3.551E+03
2001	1.314E+04	1.052E+07	1.445E+04	3.510E+03	5.261E+06	3.861E+03
2002	1.403E+04	1.123E+07	1.543E+04	3.746E+03	5.615E+06	4.121E+03
2003	1.528E+04	1.223E+07	1.681E+04	4.081E+03	6.117E+06	4.489E+03
2004	1.674E+04	1.340E+07	1.841E+04	4.471E+03	6.702E+06	4.919E+03
2005	1.827E+04	1.463E+07	2.009E+04	4.879E+03	7.314E+06	5.367E+03
2006	1.923E+04	1.540E+07	2.116E+04	5.137E+03	7.701E+06	5.651E+03
2007	1.989E+04	1.593E+07	2.188E+04	5.312E+03	7.963E+06	5.843E+03
2008	1.984E+04	1.589E+07	2.182E+04	5.299E+03	7.943E+06	5.829E+03
2009	1.981E+04	1.586E+07	2.179E+04	5.292E+03	7.932E+06	5.821E+03
2010	1.980E+04	1.586E+07	2.178E+04	5.289E+03	7.928E+06	5.818E+03
2011	1.981E+04	1.586E+07	2.179E+04	5.291E+03	7.931E+06	5.821E+03
2012	1.984E+04	1.588E+07	2.182E+04	5.298E+03	7.942E+06	5.828E+03
2013	1.988E+04	1.592E+07	2.187E+04	5.310E+03	7.959E+06	5.841E+03
2014	1.994E+04	1.597E+07	2.193E+04	5.326E+03	7.983E+06	5.858E+03
2015	2.001E+04	1.603E+07	2.201E+04	5.346E+03	8.013E+06	5.880E+03
2016	2.010E+04	1.610E+07	2.211E+04	5.370E+03	8.048E+06	5.906E+03
2017	1.957E+04	1.567E+07	2.153E+04	5.228E+03	7.836E+06	5.751E+03
2018	1.881E+04	1.506E+07	2.069E+04	5.023E+03	7.529E+06	5.525E+03
2019	1.807E+04	1.447E+07	1.987E+04	4.826E+03	7.234E+06	5.309E+03
2020	1.736E+04	1.390E+07	1.910E+04	4.637E+03	6.950E+06	5.101E+03
2021	1.668E+04	1.336E+07	1.835E+04	4.455E+03	6.678E+06	4.901E+03
2022	1.602E+04	1.283E+07	1.763E+04	4.280E+03	6.416E+06	4.708E+03
2023	1.540E+04	1.233E+07	1.694E+04	4.113E+03	6.164E+06	4.524E+03

Results (Continued)

Year	Total landfill gas			Methane		
	(Mg/year)	(m^3/year)	(short tons/year)	(Mg/year)	(m^3/year)	(short tons/year)
2024	1.479E+04	1.185E+07	1.627E+04	3.951E+03	5.923E+06	4.346E+03
2025	1.421E+04	1.138E+07	1.563E+04	3.796E+03	5.690E+06	4.176E+03
2026	1.366E+04	1.093E+07	1.502E+04	3.648E+03	5.467E+06	4.012E+03
2027	1.312E+04	1.051E+07	1.443E+04	3.504E+03	5.253E+06	3.855E+03
2028	1.261E+04	1.009E+07	1.387E+04	3.367E+03	5.047E+06	3.704E+03
2029	1.211E+04	9.698E+06	1.332E+04	3.235E+03	4.849E+06	3.559E+03
2030	1.164E+04	9.318E+06	1.280E+04	3.108E+03	4.659E+06	3.419E+03
2031	1.118E+04	8.953E+06	1.230E+04	2.986E+03	4.476E+06	3.285E+03
2032	1.074E+04	8.601E+06	1.182E+04	2.869E+03	4.301E+06	3.156E+03
2033	1.032E+04	8.264E+06	1.135E+04	2.757E+03	4.132E+06	3.032E+03
2034	9.916E+03	7.940E+06	1.091E+04	2.649E+03	3.970E+06	2.914E+03
2035	9.527E+03	7.629E+06	1.048E+04	2.545E+03	3.814E+06	2.799E+03
2036	9.154E+03	7.330E+06	1.007E+04	2.445E+03	3.665E+06	2.689E+03
2037	8.795E+03	7.042E+06	9.674E+03	2.349E+03	3.521E+06	2.584E+03
2038	8.450E+03	6.766E+06	9.295E+03	2.257E+03	3.383E+06	2.483E+03
2039	8.118E+03	6.501E+06	8.930E+03	2.169E+03	3.250E+06	2.385E+03
2040	7.800E+03	6.246E+06	8.580E+03	2.083E+03	3.123E+06	2.292E+03
2041	7.494E+03	6.001E+06	8.244E+03	2.002E+03	3.001E+06	2.202E+03
2042	7.200E+03	5.766E+06	7.920E+03	1.923E+03	2.883E+06	2.116E+03
2043	6.918E+03	5.540E+06	7.610E+03	1.848E+03	2.770E+06	2.033E+03
2044	6.647E+03	5.322E+06	7.311E+03	1.775E+03	2.661E+06	1.953E+03
2045	6.386E+03	5.114E+06	7.025E+03	1.706E+03	2.557E+06	1.876E+03
2046	6.136E+03	4.913E+06	6.749E+03	1.639E+03	2.457E+06	1.803E+03
2047	5.895E+03	4.721E+06	6.485E+03	1.575E+03	2.360E+06	1.732E+03
2048	5.664E+03	4.535E+06	6.230E+03	1.513E+03	2.268E+06	1.664E+03
2049	5.442E+03	4.358E+06	5.986E+03	1.454E+03	2.179E+06	1.599E+03
2050	5.229E+03	4.187E+06	5.751E+03	1.397E+03	2.093E+06	1.536E+03
2051	5.024E+03	4.023E+06	5.526E+03	1.342E+03	2.011E+06	1.476E+03
2052	4.827E+03	3.865E+06	5.309E+03	1.289E+03	1.932E+06	1.418E+03
2053	4.637E+03	3.713E+06	5.101E+03	1.239E+03	1.857E+06	1.363E+03
2054	4.455E+03	3.568E+06	4.901E+03	1.190E+03	1.784E+06	1.309E+03
2055	4.281E+03	3.428E+06	4.709E+03	1.143E+03	1.714E+06	1.258E+03
2056	4.113E+03	3.293E+06	4.524E+03	1.099E+03	1.647E+06	1.208E+03
2057	3.952E+03	3.164E+06	4.347E+03	1.056E+03	1.582E+06	1.161E+03
2058	3.797E+03	3.040E+06	4.176E+03	1.014E+03	1.520E+06	1.116E+03
2059	3.648E+03	2.921E+06	4.013E+03	9.744E+02	1.461E+06	1.072E+03
2060	3.505E+03	2.806E+06	3.855E+03	9.362E+02	1.403E+06	1.030E+03
2061	3.367E+03	2.696E+06	3.704E+03	8.995E+02	1.348E+06	9.894E+02
2062	3.235E+03	2.591E+06	3.559E+03	8.642E+02	1.295E+06	9.506E+02
2063	3.108E+03	2.489E+06	3.419E+03	8.303E+02	1.245E+06	9.133E+02
2064	2.987E+03	2.392E+06	3.285E+03	7.978E+02	1.196E+06	8.775E+02
2065	2.869E+03	2.298E+06	3.156E+03	7.665E+02	1.149E+06	8.431E+02
2066	2.757E+03	2.208E+06	3.033E+03	7.364E+02	1.104E+06	8.101E+02
2067	2.649E+03	2.121E+06	2.914E+03	7.075E+02	1.061E+06	7.783E+02
2068	2.545E+03	2.038E+06	2.800E+03	6.798E+02	1.019E+06	7.478E+02
2069	2.445E+03	1.958E+06	2.690E+03	6.531E+02	9.790E+05	7.185E+02
2070	2.349E+03	1.881E+06	2.584E+03	6.275E+02	9.406E+05	6.903E+02
2071	2.257E+03	1.807E+06	2.483E+03	6.029E+02	9.037E+05	6.632E+02
2072	2.169E+03	1.737E+06	2.386E+03	5.793E+02	8.683E+05	6.372E+02
2073	2.084E+03	1.669E+06	2.292E+03	5.566E+02	8.343E+05	6.122E+02
2074	2.002E+03	1.603E+06	2.202E+03	5.348E+02	8.015E+05	5.882E+02

Results (Continued)

Year	Total landfill gas			Methane		
	(Mg/year)	(m^3/year)	(short tons/year)	(Mg/year)	(m^3/year)	(short tons/year)
2075	1.923E+03	1.540E+06	2.116E+03	5.138E+02	7.701E+05	5.652E+02
2076	1.848E+03	1.480E+06	2.033E+03	4.936E+02	7.399E+05	5.430E+02
2077	1.776E+03	1.422E+06	1.953E+03	4.743E+02	7.109E+05	5.217E+02
2078	1.706E+03	1.366E+06	1.877E+03	4.557E+02	6.830E+05	5.013E+02
2079	1.639E+03	1.313E+06	1.803E+03	4.378E+02	6.563E+05	4.816E+02
2080	1.575E+03	1.261E+06	1.732E+03	4.206E+02	6.305E+05	4.627E+02
2081	1.513E+03	1.212E+06	1.664E+03	4.042E+02	6.058E+05	4.446E+02
2082	1.454E+03	1.164E+06	1.599E+03	3.883E+02	5.820E+05	4.271E+02
2083	1.397E+03	1.118E+06	1.536E+03	3.731E+02	5.592E+05	4.104E+02
2084	1.342E+03	1.075E+06	1.476E+03	3.585E+02	5.373E+05	3.943E+02
2085	1.289E+03	1.032E+06	1.418E+03	3.444E+02	5.162E+05	3.788E+02
2086	1.239E+03	9.920E+05	1.363E+03	3.309E+02	4.960E+05	3.640E+02
2087	1.190E+03	9.531E+05	1.309E+03	3.179E+02	4.765E+05	3.497E+02
2088	1.144E+03	9.157E+05	1.258E+03	3.055E+02	4.579E+05	3.360E+02
2089	1.099E+03	8.798E+05	1.209E+03	2.935E+02	4.399E+05	3.228E+02
2090	1.056E+03	8.453E+05	1.161E+03	2.820E+02	4.226E+05	3.102E+02
2091	1.014E+03	8.122E+05	1.116E+03	2.709E+02	4.061E+05	2.980E+02
2092	9.745E+02	7.803E+05	1.072E+03	2.603E+02	3.902E+05	2.863E+02
2093	9.363E+02	7.497E+05	1.030E+03	2.501E+02	3.749E+05	2.751E+02
2094	8.995E+02	7.203E+05	9.895E+02	2.403E+02	3.602E+05	2.643E+02
2095	8.643E+02	6.921E+05	9.507E+02	2.309E+02	3.460E+05	2.539E+02
2096	8.304E+02	6.649E+05	9.134E+02	2.218E+02	3.325E+05	2.440E+02
2097	7.978E+02	6.389E+05	8.776E+02	2.131E+02	3.194E+05	2.344E+02
2098	7.665E+02	6.138E+05	8.432E+02	2.048E+02	3.069E+05	2.252E+02
2099	7.365E+02	5.897E+05	8.101E+02	1.967E+02	2.949E+05	2.164E+02
2100	7.076E+02	5.666E+05	7.784E+02	1.890E+02	2.833E+05	2.079E+02
2101	6.799E+02	5.444E+05	7.478E+02	1.816E+02	2.722E+05	1.998E+02
2102	6.532E+02	5.231E+05	7.185E+02	1.745E+02	2.615E+05	1.919E+02
2103	6.276E+02	5.025E+05	6.904E+02	1.676E+02	2.513E+05	1.844E+02
2104	6.030E+02	4.828E+05	6.633E+02	1.611E+02	2.414E+05	1.772E+02
2105	5.793E+02	4.639E+05	6.373E+02	1.547E+02	2.320E+05	1.702E+02
2106	5.566E+02	4.457E+05	6.123E+02	1.487E+02	2.229E+05	1.635E+02
2107	5.348E+02	4.282E+05	5.883E+02	1.429E+02	2.141E+05	1.571E+02
2108	5.138E+02	4.115E+05	5.652E+02	1.372E+02	2.057E+05	1.510E+02
2109	4.937E+02	3.953E+05	5.431E+02	1.319E+02	1.977E+05	1.451E+02
2110	4.743E+02	3.798E+05	5.218E+02	1.267E+02	1.899E+05	1.394E+02
2111	4.557E+02	3.649E+05	5.013E+02	1.217E+02	1.825E+05	1.339E+02
2112	4.379E+02	3.506E+05	4.816E+02	1.170E+02	1.753E+05	1.287E+02
2113	4.207E+02	3.369E+05	4.628E+02	1.124E+02	1.684E+05	1.236E+02
2114	4.042E+02	3.237E+05	4.446E+02	1.080E+02	1.618E+05	1.188E+02

Results (Continued)

Year	Carbon dioxide			NMOC		
	(Mg/year)	(m^3/year)	(short tons/year)	(Mg/year)	(m^3/year)	(short tons/year)
1974	0	0	0	0	0	0
1975	1.685E+02	9.202E+04	1.853E+02	3.895E-01	1.087E+02	4.284E-01
1976	3.303E+02	1.804E+05	3.633E+02	7.637E-01	2.131E+02	8.401E-01
1977	4.858E+02	2.654E+05	5.344E+02	1.123E+00	3.134E+02	1.236E+00
1978	6.352E+02	3.470E+05	6.987E+02	1.469E+00	4.097E+02	1.616E+00
1979	7.787E+02	4.254E+05	8.566E+02	1.801E+00	5.023E+02	1.981E+00
1980	9.167E+02	5.008E+05	1.008E+03	2.120E+00	5.913E+02	2.331E+00
1981	1.049E+03	5.732E+05	1.154E+03	2.426E+00	6.768E+02	2.669E+00
1982	1.176E+03	6.427E+05	1.294E+03	2.720E+00	7.589E+02	2.992E+00
1983	1.299E+03	7.095E+05	1.429E+03	3.003E+00	8.378E+02	3.303E+00
1984	1.416E+03	7.737E+05	1.558E+03	3.275E+00	9.136E+02	3.602E+00
1985	1.529E+03	8.354E+05	1.682E+03	3.536E+00	9.865E+02	3.890E+00
1986	1.638E+03	8.947E+05	1.802E+03	3.787E+00	1.056E+03	4.165E+00
1987	1.742E+03	9.516E+05	1.916E+03	4.028E+00	1.124E+03	4.431E+00
1988	1.842E+03	1.006E+06	2.026E+03	4.259E+00	1.188E+03	4.685E+00
1989	1.938E+03	1.059E+06	2.132E+03	4.482E+00	1.250E+03	4.930E+00
1990	2.031E+03	1.109E+06	2.234E+03	4.696E+00	1.310E+03	5.165E+00
1991	2.120E+03	1.158E+06	2.332E+03	4.901E+00	1.367E+03	5.391E+00
1992	2.441E+03	1.333E+06	2.685E+03	5.644E+00	1.575E+03	6.208E+00
1993	2.750E+03	1.502E+06	3.025E+03	6.358E+00	1.774E+03	6.993E+00
1994	3.046E+03	1.664E+06	3.351E+03	7.043E+00	1.965E+03	7.748E+00
1995	3.330E+03	1.819E+06	3.663E+03	7.699E+00	2.148E+03	8.469E+00
1996	3.688E+03	2.015E+06	4.057E+03	8.527E+00	2.379E+03	9.380E+00
1997	5.557E+03	3.036E+06	6.113E+03	1.285E+01	3.585E+03	1.413E+01
1998	6.836E+03	3.734E+06	7.519E+03	1.581E+01	4.410E+03	1.739E+01
1999	7.928E+03	4.331E+06	8.721E+03	1.833E+01	5.114E+03	2.017E+01
2000	8.858E+03	4.839E+06	9.744E+03	2.048E+01	5.714E+03	2.253E+01
2001	9.630E+03	5.261E+06	1.059E+04	2.227E+01	6.212E+03	2.449E+01
2002	1.028E+04	5.615E+06	1.131E+04	2.377E+01	6.631E+03	2.614E+01
2003	1.120E+04	6.117E+06	1.232E+04	2.589E+01	7.223E+03	2.848E+01
2004	1.227E+04	6.702E+06	1.350E+04	2.837E+01	7.914E+03	3.120E+01
2005	1.339E+04	7.314E+06	1.473E+04	3.096E+01	8.636E+03	3.405E+01
2006	1.410E+04	7.701E+06	1.551E+04	3.259E+01	9.093E+03	3.585E+01
2007	1.458E+04	7.963E+06	1.603E+04	3.370E+01	9.402E+03	3.707E+01
2008	1.454E+04	7.943E+06	1.599E+04	3.362E+01	9.379E+03	3.698E+01
2009	1.452E+04	7.932E+06	1.597E+04	3.357E+01	9.366E+03	3.693E+01
2010	1.451E+04	7.928E+06	1.596E+04	3.356E+01	9.361E+03	3.691E+01
2011	1.452E+04	7.931E+06	1.597E+04	3.357E+01	9.365E+03	3.693E+01
2012	1.454E+04	7.942E+06	1.599E+04	3.361E+01	9.378E+03	3.698E+01
2013	1.457E+04	7.959E+06	1.603E+04	3.369E+01	9.398E+03	3.706E+01
2014	1.461E+04	7.983E+06	1.607E+04	3.379E+01	9.426E+03	3.717E+01
2015	1.467E+04	8.013E+06	1.613E+04	3.391E+01	9.461E+03	3.731E+01
2016	1.473E+04	8.048E+06	1.621E+04	3.407E+01	9.504E+03	3.747E+01
2017	1.434E+04	7.836E+06	1.578E+04	3.317E+01	9.253E+03	3.648E+01
2018	1.378E+04	7.529E+06	1.516E+04	3.187E+01	8.890E+03	3.505E+01
2019	1.324E+04	7.234E+06	1.457E+04	3.062E+01	8.542E+03	3.368E+01
2020	1.272E+04	6.950E+06	1.399E+04	2.942E+01	8.207E+03	3.236E+01
2021	1.222E+04	6.678E+06	1.345E+04	2.826E+01	7.885E+03	3.109E+01
2022	1.174E+04	6.416E+06	1.292E+04	2.716E+01	7.576E+03	2.987E+01
2023	1.128E+04	6.164E+06	1.241E+04	2.609E+01	7.279E+03	2.870E+01

Results (Continued)

Year	Carbon dioxide			NMOC		
	(Mg/year)	(m^3/year)	(short tons/year)	(Mg/year)	(m^3/year)	(short tons/year)
2024	1.084E+04	5.923E+06	1.193E+04	2.507E+01	6.993E+03	2.757E+01
2025	1.042E+04	5.690E+06	1.146E+04	2.409E+01	6.719E+03	2.649E+01
2026	1.001E+04	5.467E+06	1.101E+04	2.314E+01	6.456E+03	2.545E+01
2027	9.615E+03	5.253E+06	1.058E+04	2.223E+01	6.203E+03	2.446E+01
2028	9.238E+03	5.047E+06	1.016E+04	2.136E+01	5.959E+03	2.350E+01
2029	8.876E+03	4.849E+06	9.764E+03	2.052E+01	5.726E+03	2.258E+01
2030	8.528E+03	4.659E+06	9.381E+03	1.972E+01	5.501E+03	2.169E+01
2031	8.194E+03	4.476E+06	9.013E+03	1.895E+01	5.286E+03	2.084E+01
2032	7.873E+03	4.301E+06	8.660E+03	1.820E+01	5.078E+03	2.002E+01
2033	7.564E+03	4.132E+06	8.320E+03	1.749E+01	4.879E+03	1.924E+01
2034	7.267E+03	3.970E+06	7.994E+03	1.680E+01	4.688E+03	1.848E+01
2035	6.982E+03	3.814E+06	7.681E+03	1.614E+01	4.504E+03	1.776E+01
2036	6.709E+03	3.665E+06	7.379E+03	1.551E+01	4.327E+03	1.706E+01
2037	6.445E+03	3.521E+06	7.090E+03	1.490E+01	4.158E+03	1.639E+01
2038	6.193E+03	3.383E+06	6.812E+03	1.432E+01	3.995E+03	1.575E+01
2039	5.950E+03	3.250E+06	6.545E+03	1.376E+01	3.838E+03	1.513E+01
2040	5.717E+03	3.123E+06	6.288E+03	1.322E+01	3.688E+03	1.454E+01
2041	5.492E+03	3.001E+06	6.042E+03	1.270E+01	3.543E+03	1.397E+01
2042	5.277E+03	2.883E+06	5.805E+03	1.220E+01	3.404E+03	1.342E+01
2043	5.070E+03	2.770E+06	5.577E+03	1.172E+01	3.271E+03	1.290E+01
2044	4.871E+03	2.661E+06	5.359E+03	1.126E+01	3.142E+03	1.239E+01
2045	4.680E+03	2.557E+06	5.148E+03	1.082E+01	3.019E+03	1.190E+01
2046	4.497E+03	2.457E+06	4.947E+03	1.040E+01	2.901E+03	1.144E+01
2047	4.321E+03	2.360E+06	4.753E+03	9.990E+00	2.787E+03	1.099E+01
2048	4.151E+03	2.268E+06	4.566E+03	9.598E+00	2.678E+03	1.056E+01
2049	3.988E+03	2.179E+06	4.387E+03	9.222E+00	2.573E+03	1.014E+01
2050	3.832E+03	2.093E+06	4.215E+03	8.860E+00	2.472E+03	9.746E+00
2051	3.682E+03	2.011E+06	4.050E+03	8.513E+00	2.375E+03	9.364E+00
2052	3.537E+03	1.932E+06	3.891E+03	8.179E+00	2.282E+03	8.997E+00
2053	3.399E+03	1.857E+06	3.739E+03	7.858E+00	2.192E+03	8.644E+00
2054	3.265E+03	1.784E+06	3.592E+03	7.550E+00	2.106E+03	8.305E+00
2055	3.137E+03	1.714E+06	3.451E+03	7.254E+00	2.024E+03	7.980E+00
2056	3.014E+03	1.647E+06	3.316E+03	6.970E+00	1.944E+03	7.667E+00
2057	2.896E+03	1.582E+06	3.186E+03	6.697E+00	1.868E+03	7.366E+00
2058	2.783E+03	1.520E+06	3.061E+03	6.434E+00	1.795E+03	7.077E+00
2059	2.673E+03	1.461E+06	2.941E+03	6.182E+00	1.725E+03	6.800E+00
2060	2.569E+03	1.403E+06	2.826E+03	5.939E+00	1.657E+03	6.533E+00
2061	2.468E+03	1.348E+06	2.715E+03	5.706E+00	1.592E+03	6.277E+00
2062	2.371E+03	1.295E+06	2.608E+03	5.483E+00	1.530E+03	6.031E+00
2063	2.278E+03	1.245E+06	2.506E+03	5.268E+00	1.470E+03	5.794E+00
2064	2.189E+03	1.196E+06	2.408E+03	5.061E+00	1.412E+03	5.567E+00
2065	2.103E+03	1.149E+06	2.313E+03	4.863E+00	1.357E+03	5.349E+00
2066	2.021E+03	1.104E+06	2.223E+03	4.672E+00	1.303E+03	5.139E+00
2067	1.941E+03	1.061E+06	2.135E+03	4.489E+00	1.252E+03	4.938E+00
2068	1.865E+03	1.019E+06	2.052E+03	4.313E+00	1.203E+03	4.744E+00
2069	1.792E+03	9.790E+05	1.971E+03	4.144E+00	1.156E+03	4.558E+00
2070	1.722E+03	9.406E+05	1.894E+03	3.981E+00	1.111E+03	4.379E+00
2071	1.654E+03	9.037E+05	1.820E+03	3.825E+00	1.067E+03	4.208E+00
2072	1.589E+03	8.683E+05	1.748E+03	3.675E+00	1.025E+03	4.043E+00
2073	1.527E+03	8.343E+05	1.680E+03	3.531E+00	9.851E+02	3.884E+00
2074	1.467E+03	8.015E+05	1.614E+03	3.393E+00	9.465E+02	3.732E+00

Results (Continued)

Year	Carbon dioxide			NMOC		
	(Mg/year)	(m^3/year)	(short tons/year)	(Mg/year)	(m^3/year)	(short tons/year)
2075	1.410E+03	7.701E+05	1.551E+03	3.260E+00	9.094E+02	3.586E+00
2076	1.354E+03	7.399E+05	1.490E+03	3.132E+00	8.737E+02	3.445E+00
2077	1.301E+03	7.109E+05	1.431E+03	3.009E+00	8.394E+02	3.310E+00
2078	1.250E+03	6.830E+05	1.375E+03	2.891E+00	8.065E+02	3.180E+00
2079	1.201E+03	6.563E+05	1.321E+03	2.778E+00	7.749E+02	3.055E+00
2080	1.154E+03	6.305E+05	1.270E+03	2.669E+00	7.445E+02	2.936E+00
2081	1.109E+03	6.058E+05	1.220E+03	2.564E+00	7.153E+02	2.820E+00
2082	1.065E+03	5.820E+05	1.172E+03	2.464E+00	6.873E+02	2.710E+00
2083	1.024E+03	5.592E+05	1.126E+03	2.367E+00	6.603E+02	2.604E+00
2084	9.835E+02	5.373E+05	1.082E+03	2.274E+00	6.344E+02	2.502E+00
2085	9.449E+02	5.162E+05	1.039E+03	2.185E+00	6.096E+02	2.403E+00
2086	9.079E+02	4.960E+05	9.987E+02	2.099E+00	5.857E+02	2.309E+00
2087	8.723E+02	4.765E+05	9.595E+02	2.017E+00	5.627E+02	2.219E+00
2088	8.381E+02	4.579E+05	9.219E+02	1.938E+00	5.406E+02	2.132E+00
2089	8.052E+02	4.399E+05	8.858E+02	1.862E+00	5.194E+02	2.048E+00
2090	7.737E+02	4.226E+05	8.510E+02	1.789E+00	4.991E+02	1.968E+00
2091	7.433E+02	4.061E+05	8.177E+02	1.719E+00	4.795E+02	1.891E+00
2092	7.142E+02	3.902E+05	7.856E+02	1.651E+00	4.607E+02	1.816E+00
2093	6.862E+02	3.749E+05	7.548E+02	1.587E+00	4.426E+02	1.745E+00
2094	6.593E+02	3.602E+05	7.252E+02	1.524E+00	4.253E+02	1.677E+00
2095	6.334E+02	3.460E+05	6.968E+02	1.465E+00	4.086E+02	1.611E+00
2096	6.086E+02	3.325E+05	6.694E+02	1.407E+00	3.926E+02	1.548E+00
2097	5.847E+02	3.194E+05	6.432E+02	1.352E+00	3.772E+02	1.487E+00
2098	5.618E+02	3.069E+05	6.180E+02	1.299E+00	3.624E+02	1.429E+00
2099	5.398E+02	2.949E+05	5.937E+02	1.248E+00	3.482E+02	1.373E+00
2100	5.186E+02	2.833E+05	5.705E+02	1.199E+00	3.345E+02	1.319E+00
2101	4.983E+02	2.722E+05	5.481E+02	1.152E+00	3.214E+02	1.267E+00
2102	4.787E+02	2.615E+05	5.266E+02	1.107E+00	3.088E+02	1.218E+00
2103	4.600E+02	2.513E+05	5.060E+02	1.064E+00	2.967E+02	1.170E+00
2104	4.419E+02	2.414E+05	4.861E+02	1.022E+00	2.851E+02	1.124E+00
2105	4.246E+02	2.320E+05	4.671E+02	9.818E-01	2.739E+02	1.080E+00
2106	4.079E+02	2.229E+05	4.487E+02	9.433E-01	2.632E+02	1.038E+00
2107	3.919E+02	2.141E+05	4.311E+02	9.063E-01	2.528E+02	9.969E-01
2108	3.766E+02	2.057E+05	4.142E+02	8.707E-01	2.429E+02	9.578E-01
2109	3.618E+02	1.977E+05	3.980E+02	8.366E-01	2.334E+02	9.203E-01
2110	3.476E+02	1.899E+05	3.824E+02	8.038E-01	2.242E+02	8.842E-01
2111	3.340E+02	1.825E+05	3.674E+02	7.723E-01	2.155E+02	8.495E-01
2112	3.209E+02	1.753E+05	3.530E+02	7.420E-01	2.070E+02	8.162E-01
2113	3.083E+02	1.684E+05	3.391E+02	7.129E-01	1.989E+02	7.842E-01
2114	2.962E+02	1.618E+05	3.259E+02	6.849E-01	1.911E+02	7.534E-01

ATTACHMENT B

2006 AOR Support Data
Facility Information
(Not Submitted with EAOR)

Data Provided Taken From Circular Charts And Information Provided By Becky Diden (2/21/2007)

2006 Waste Amount: 157,869.32 tons

Ozone Season Operation
1 season = 92 days
(June 1-Aug 31)

2191 Hr/season
23.8 Hr/day
6.9 days/week

2006	Hours/mo	flare hours of operation
Jan	744	730
Feb	672	668
Mar	744	742
Apr	720	705
May	744	720
Jun	720	709
Jul	744	744
Aug	744	738
Sep	720	709
Oct	744	620
Nov	720	720
Dec	744	744
total		**8549**

Percent by Season		
	hours	% of operation
DJF	2142	**25**
MAM	2167	**25**
JJA	2191	**26**
SON	2049	**24**
total	8549	**100**

			flare gas flow rate			
2006	log start	log end	scf*10	SCF	MMCF	scfm
Jan	22897621	26890075	3992454	39924540	39.92	969
Feb	26890075	30049092	3159017	31590170	31.59	759
Mar	30049092	33743270	3694178	36941780	36.94	864
Apr	33743270	37092984	3349714	33497140	33.50	740
May	37092984	4002344	-33090640	-3.31E+08	-330.91	829
Jun	4002344	43171087	39168743	391687430	391.69	910
Jul	43171087	46944222	3773135	37731350	37.73	869
Aug	46944222		-46944222	-4.69E+08	-469.44	847
Sep		54217320	54217320	542173200	542.17	850
Oct	54217320	56890441	2673121	26731210	26.73	819
Nov	56890441	60247585	3357144	33571440	33.57	901
Dec	60247585	91490594	31243009	312430090	312.43	822
Total			**68592973**	**685929730**	**685.93**	**848.25**

Avg Flow

Flow Per Year

scf	**MMscf**
4.35E+08	**435.10**

Notes: There were several jumps in total flow recorded on the monitoring forms.
Average flow for the year was used to estimate total flow.

Verbally per Melissa Ransom (01/26/04) use Bob McIntyre's 2003 estimate:
Propane fuel usage is 10 lb/month

Fuel Usage*		
lb/yr	**1000 gal/yr**	**1000 gal/day/ozone season**
120	0.03	0.0071
	unit operated 91 days during ozone season	

Heating Value*	
Btu/gal	**MMBtu/1000 gal**
91,547	91.547

**Source of propane characteristics: National Propane Gas Association*
based on propane density of 4.24 lb/gal

Golder Associates Inc.

8933 Western Way, Suite 12
Jacksonville, FL USA 32256
Telephone (904) 363-3430
Fax (904) 363-3445

February 28, 2007 993-3928.75

Florida Department of Environmental Protection
Northeast District - District Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

RE: 2006 STATEMENT OF COMPLIANCE
WEST NASSAU CLASS I LANDFILL
CALLAHAN, NASSAU COUNTY, FLORIDA
AIRS ID NUMBER 0890428
PERMIT NUMBER: 0890428-005-AV

On behalf of the Nassau County Board of County Commissioners, Golder Associates Inc. (Golder) has prepared the 2006 Statement of Compliance for the above referenced Title V facility. Please find attached two copies of the Florida Department of Environmental Protection (FDEP) Form No. 62-213.900(7) and attached compliance table.

Should you have any questions regarding this letter, please call the undersigned at (904) 363-3430.

Sincerely,

GOLDER ASSOCIATES INC.

Wendy D. Karably
Senior Consultant/Associate

Attachments

cc: US EPA Region 4, Air, Pesticides & Toxic Management Division, Operating Permits Section, 61 Forsyth Street, Atlanta, Georgia 30303 (404-562-9099)
Mr. Jim B. Higginbotham -Chairman of the Board of County Commissioners
Mr. Lee Pickett – Interim Solid Waste Department Director

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Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

× **Annual Requirement**	☐ **Transfer of Permit**	☐ **Permanent Facility Shutdown**

REPORTING PERIOD*	REPORT DEADLINE**
January 1 through December 31 of 2006 (year)	March 1, 2007

*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

**See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: Nassau County Board of County Commissioners

Site Name: West Nassau Class I Landfill Facility ID No. 0890428 County: Nassau

COMPLIANCE STATEMENT (Check only one of the following three options)

X **A.** This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

____ **B.** This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

____ **C.** This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.

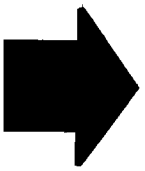
For each incident of deviation, as described in paragraph **B.** above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.



(Signature of Title V Source Responsible Official) 2-26-07 *(Date)*

Name: **Mr. Jim B Higginbotham** Title: **Chairman of Nassau County Board of County Commissioners**

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

(Signature of Acid Rain Source Designated Representative) *(Date)*

Name:_____ Title:_____

{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency(EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}

Golder Associates Inc.

8933 Western Way, Suite 12
Jacksonville, FL USA 32256
Telephone (904) 363-3430
Fax (904) 363-3445

February 28, 2007

993-3928.75

Florida Department of Environmental Protection
Division of Air Resources Management
Major Air Pollution Source Annual Emissions Fee
P.O. Box 3070
Tallahassee, Florida 32315-3070

RE: 2006 MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS FEE
WEST NASSAU CLASS I LANDFILL
CALLAHAN, NASSAU COUNTY, FLORIDA
AIRS ID NUMBER 0890428
PERMIT NUMBER: 0890428-005-AV

On behalf of the Nassau County Board of County Commissioners, Golder Associates Inc. (Golder) has prepared this 2006 Major Air Pollution Source Annual Emissions Fee Form for the above referenced Permit.

The facility's existing permit does not establish specific permit conditions for regulated air pollutants; therefore, the facility is not subject to the fee factor of $25/ton of emissions. However, the facility is subject to the minimum fee of $250.00. A check in the amount of $250.00 is attached.

Should you have any questions regarding this letter, please call the undersigned at (904) 363-3430.

Sincerely,

GOLDER ASSOCIATES INC.

Wendy D. Karably
Senior Consultant/Associate

Attachments

cc: Mr. Jim B. Higginbotham –Chairman, Nassau County Board of County Commissioners
Mr. Lee Pickett – Interim Solid Waste Department Director

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Department of Environmental Protection

DOC No. _____
Postmark Date ___/___/___
MSD ___/___/___
Org.: 37550101000 EO: A7
Fund: 20-2-035001
Payment No.: _____
Remittance No.: _____

(Filled in by DEP)

DIVISION OF AIR RESOURCES MANAGEMENT

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS FEE FORM

Please read the instructions for this form and print or type all information.

CALENDAR YEAR EMISSIONS REPORTED: **2006**

Fee payment is due between January 15th and March 1st of following year. If the Department has not received the fee payment by March 1st, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the unpaid fee, plus interest on such amount computed in accordance with s. 220.807, Florida Statutes, except as provided at Rule 62-213.205, F.A.C. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely any required annual emissions fee, penalty or interest.

FACILITY INFORMATION

1. Facility owner/company name		2. Facility ID Number
Nassau County Board of County Commissioners		**0890428**
3. Facility name/street address or location description		
West Nassau Class I Landfill / 46026 Landfill Road		
4. Facility city	Zip code	County
Callahan	**32011**	**Nassau**
5. Name of person to be contacted if there are questions about information submitted		6. Contact's telephone number
Mr. Lee Pickett		**(904) 879-6321**
7. Total Fee Amount from Page C		**$ 250**
8. One-time fee credit (if applicable from Page D)	**N/A**	$
9a. Penalty (if applicable)	9b. Interest (if applicable)	9c. Penalty + Interest (9a.+ 9b.)
$	$	$
10. Total payment remitted		**$ 250**

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am the responsible official as defined in Chapter 62-213, F.A.C., of the Title V source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

Signature

Mr. Jim B. Higginbotham	**Chair, Board of Nassau Co. Comm.**	2-26-07
Name	Title	Date

Submit check, draft, or money order, made payable to **Florida DEP.**
Send payment & completed form to:

Major Air Pollution Source Annual Emissions Fee
P.O. Box 3070
Tallahassee, Florida 32315-3070

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS FEE FORM
EMISSIONS UNIT INFORMATION SHEET

Facility Name: **West Nassau Class I Landfill**

Emissions Unit Permit/Certification No.: **0890428-005-AV**

Emissions Unit I.D.No. (if known): **001 Municipal Solid Waste Landfill**

Brief description of emissions unit regulated individually or group of emissions units regulated collectively:

I. Regulated Air pollutant(s) allowed to be emitted by specific permit condition for this emissions unit or group of emissions units (excluding carbon monoxide)	II. Most limiting maximum allowable pollutant emission rate (fill in one column only for each pollutant)				III. Operating conditions - Maximum allowed by permit per year		IV. Operating conditions - Actual documented for reported calendar year		V. Annual emissions to which fees apply		
	pounds per hour	tons per year	tons per unit of material or heat input or product output (tons)	tons per unit of material or heat input or product output (units)	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	calculated annual tons of pollutant emissions	actual tons recorded annual emissions using C.E.M. or other DEP-approved method	code (See Instructions)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
N/A (no pollutant emission limitations)											

Calculations/Comments:

No. 1 of 2 total Emissions Unit Information Sheets (Page B's) submitted for this facility. List all permitted emissions units, even if not operated during the reported year.

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS FEE FORM
EMISSIONS UNIT INFORMATION SHEET

Facility Name: **West Nassau Class I Landfill**

Emissions Unit Permit/Certification No.: **0890428-005-AV**

Emissions Unit I.D.No. (if known): **002 Landfill Flare**

Brief description of emissions unit regulated individually or group of emissions units regulated collectively:

I. Regulated Air pollutant(s) allowed to be emitted by specific permit condition for this emissions unit or group of emissions units (excluding carbon monoxide)	II. Most limiting maximum allowable pollutant emission rate (fill in one column only for each pollutant)				III. Operating conditions - Maximum allowed by permit per year		IV. Operating conditions - Actual documented for reported calendar year		V. Annual emissions to which fees apply		
	pounds per hour	tons per year	tons per unit of material or heat input or product output		hours of operation	amount of material or heat input or product output [in units specified in column (e)]	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	calculated annual tons of pollutant emissions	actual tons recorded annual emissions using C.E.M. or other DEP-approved method	code (See Instructions)
			(tons)	(units)							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
N/A (no pollutant emission limitations)											

Calculations/Comments:

No. 2 of 2 total Emissions Unit Information Sheets (Page B's) submitted for this facility. List all permitted emissions units, even if not operated during the reported year.

MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS FEE FORM
FEE PAYMENT CALCULATION SHEET

Facility Name: **West Nassau Class I Landfill**

Regulated Air pollutant(s) allowed to be emitted by specific permit conditions for this facility (excluding carbon monoxide).	Total facility annual emissions for each pollutant listed in column (a). [Sum of column entries (j) and/or (k) for pollutant on Page(s) B for all emissions units at facility]	If amount in column (b) is less than 4000 tons, enter amount in column (c). If the amount in column (b) is equal to or greater than 4000 tons, enter 4000 in column (c).	Multiply amount in column (c) by the applicable fee factor pursuant to Rule 62-213.205, F.A.C. and enter dollar amount in column (d).
(a)	(b)	(c)	(d)
N/A	**N/A**	**N/A**	**N/A**
		Total Fee Amount (must be no less than $250.00 minimum fee)	**$250**

ELECTRONIC ANNUAL OPERATING REPORT

Emission Report by Facility

Facility ID: **0890428** # of Emission Units: **2**

Owner/Company Name: **NASSAU CO. BOARD OF COUNTY COMMISSIONERS**

Site Name: **WEST NASSAU LANDFILL**

Pollutant	2006 Actual (TPY)	2005 Actual (TPY)
CO	**165.100000**	**208.100000**
HAPS	**4.950000**	**11.420000**
NMOC	**25.020000**	**22.530000**
NOX	**8.700000**	**11.000000**
PM	**3.697500**	**4.675000**
PM10	**3.697500**	**4.675000**
SO2	**1.261500**	**1.595000**
VOC	**7.770000**	**27.080000**

ELECTRONIC ANNUAL OPERATING REPORT

Emission Report by EU

Facility ID: **0890428**

Owner/Company Name: **NASSAU CO. BOARD OF COUNTY**

Site Name: **WEST NASSAU LANDFILL**

EU ID	EU Description	Pollutant	2006 Actual (TPY)	2005 Actual (TPY)
001	**Municipal Solid Waste Landfill**			
		CO	**1.9**	**1.7**
		HAPS	**4.9**	**11.3**
		NMOC	**24.8**	**22.3**
		VOC	**7.7**	**26.8**
002	**LANDFILL GAS UTILITY FLARE**			
		CO	**163.2**	**206.4**
		HAPS	**0.05**	**0.12**
		NMOC	**0.22**	**0.23**
		NOX	**8.7**	**11**
		PM	**3.6975**	**4.675**
		PM10	**3.6975**	**4.675**
		SO2	**1.2615**	**1.595**
		VOC	**0.07**	**0.28**