



September 28, 2010

993-3928.94

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

Attention: Mr. Christopher Kirts

**RE: VISIBLE EMISSIONS TESTING OF THE FLARE
 WEST NASSAU CLASS I LANDFILL
 CALLAHAN, NASSAU COUNTY, FLORIDA
 PERMIT NUMBER: 0890428-008-AV**

Dear Mr. Kirts:

On behalf of the Nassau County Board of County Commissioners, Golder Associates Inc. (Golder) has prepared this report for visible emissions testing of the flare at the West Nassau Landfill. The facility's Title V Permit requires that the flare be tested for visible emissions once each fiscal year to ensure compliance with condition A.7.a which states, "The flare shall be designed for and operated with no visible emissions as determined by methods specified in Conditions A.15., A.23., A24., except for periods not to exceed a total of five minutes during any two consecutive hours."

The visible emissions testing (observation) was performed at the facility on September 23, 2010. Procedures from US EPA Method 22 were utilized as well as the forms contained therein. The observation period was conducted for 2 hours; rest periods were taken as required by Method 22. Results of the observations and rest periods are included herein as an attachment. Note that during the testing period, the flare shutdown automatically at approximately 9:32 am and was down for a period of approximately 20 minutes. Upon successful restart of the flare, the visible emissions test was resumed. During the testing period, no visible emissions were observed; therefore, the flare is operating in accordance with Condition A.7.a of the facility's Title V Permit.

Immediately following this cover letter is the Responsible Official's signature and certification statement for this report. Should you have any questions regarding this report, please call the undersigned at (904) 363-3430.

Sincerely,

GOLDER ASSOCIATES INC.

Don E. Grigg, P.E.
 Senior Project Engineer

Wendy D. Karably
 Senior Consultant and Principal

cc: Mr. Michael Boyle - Chairman of the Board of County Commissioners
 Ms. Becky Diden - Nassau County Solid Waste Department
 Mr. Scott Herring, P.E. - Nassau County Engineer

Enclosures Responsible Official Certification
 Method 22 Observation Form

FN: G:\Projects\993\993-39\993-3928\94\VE Testing\9-993-3928.92 VE RPT.docx

Golder Associates Inc.
 9428 Baymeadows Road, Suite 400
 Jacksonville, FL 32256 USA
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Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America



DRAFT

RESPONSIBLE OFFICIAL CERTIFICATION

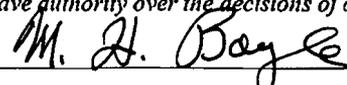
RESPONSIBLE OFFICIAL CERTIFICATION

Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

Identification of Facility

1. Facility Owner/Company Name: Nassau County Board of County Commissioners	
2. Site Name: West Nassau Landfill	3. County: Nassau County
4. Title V Air Operation Permit/Project No.: 0890428-008-AV (FLARE VISIBLE EMISSIONS TEST)	

Responsible Official

1. Name and Position Title of Responsible Official: Michael Boyle, Chairman, Nassau County Board of County Commissioners	
2. Responsible Official Mailing Address: 96160 Nassau Place Organization/Firm: Nassau County Board of County Commissioners Street Address: 96160 Nassau Place City: Yulee State: Florida Zip Code: 32097	
3. Responsible Official Telephone Numbers: Telephone: (904) 491-7380 Fax: (904)321-5784	
4. Responsible Official Qualification (<i>Check one or more of the following options, as applicable</i>): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.	
5. Responsible Official Statement: <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i> <div style="display: flex; justify-content: space-between; align-items: flex-end; margin-top: 10px;"> <div style="text-align: center;">  _____ Signature </div> <div style="text-align: center;"> 10-25-10 _____ Date </div> </div>	

*EOK
10/25/10*

[Signature]
10/25/10

ATTEST _____
SIGNATURE _____
MAN'S

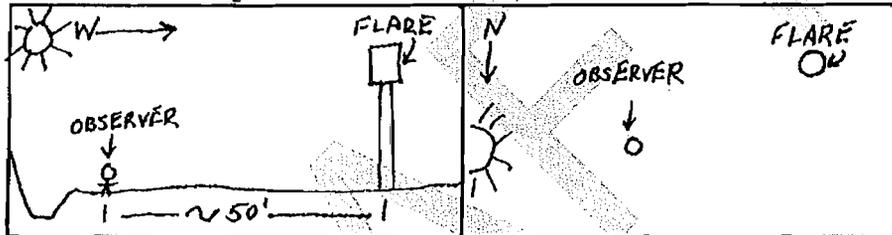
*600000000
10/25/10*

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METHOD 22 OBSERVATION FORM

FUGITIVE OR SMOKE EMISSION INSPECTION OUTDOOR LOCATION	
Company <u>GOLDER ASSOCIATES INC.</u> Location <u>WEST NASSAU LANDFILL</u> Company Rep. <u>DON E. GRIGG*</u>	Observer <u>D.E.G.</u> Affiliation Date <u>9/23/10</u>
Sky Conditions <u>CLEAR TO PARTLY CLOUDY</u> Precipitation <u>NONE</u>	Wind Direction <u>ENE</u> Wind Speed <u>0-5</u>
Industry <u>MSW LANDFILL</u>	Process Unit <u>FLARE</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>0800</u>	<u>20:00</u>	<u>0:00</u>
	<u>0820</u>	<u>REST</u>	
	<u>0826</u>	<u>20:00/40:00</u>	<u>0:00</u>
	<u>0846</u>	<u>REST</u>	
	<u>0852</u>	<u>20:00/60:00</u>	<u>0:00</u>
	<u>0912</u>	<u>REST</u>	
	<u>0918</u>	<u>14:30/74:30</u>	<u>0:00</u>
	<u>0932</u>	<u>FLARE SHUTDOWN</u>	
	<u>0954</u>	<u>15:30/90:00</u>	<u>0:00</u>
	<u>1009</u>	<u>REST</u>	
End Observation	<u>1019</u>	<u>15:00/105:00</u>	<u>0:00</u>
	<u>1034</u>	<u>REST</u>	

Figure 22-1

1039 15:00/120:00 0:00
1054

Don E. Grigg 9/23/10

* DON E. GRIGG IS A FORMER CERTIFIED METHOD 9 OBSERVER.