

**WORK AUTHORIZATION # 46  
NASSAU COUNTY  
BOARD OF COUNTY COMMISSIONERS**

CS-22-342

<b>Consultant/Vendor:</b>	S2L, Incorporated
<b>Contract Number:</b>	CM2685
<b>Contact Name:</b>	Omar Smith, P.E., V.P.
<b>Contact Number:</b>	407-475-9163
<b>Email:</b>	osmith@s2li.com

CURRENT WORK AUTHORIZATION			
Project Short Title: Title V Air Operations Permit & Construction Permit WN			
		<b>CONTRACT OVERVIEW</b>	
<b>Date Submitted</b>	8/25/2023	<b>Total of Previous Authorizations</b>	\$2,193,750.78
<b>Amount</b>	\$30,896.01	<b>This Work Authorization</b>	\$30,896.01
<b>Scheduled Completion</b>	November 30, 2024	<b>New Contract Amount including this work authorization</b>	\$2,224,646.79

This Work Authorization is to the AGREEMENT between Nassau County and S2L, Incorporated (“Vendor”) for the Continuing Contract for Professional Engineering Services-Solid Waste Landfills and Other Related Ancillary Facilities for Nassau County, Florida, dated July 26, 2019. The services to be provided under this Work Authorization are as follows:

ARTICLE 1. Services Described as:

S2Li Project Team will provide for the preparation and electronic submission of the West Nassau Landfill Title V operations permit renewal application and construction permit modification to FDEP. The operation’s 5-year permit renewal application will include a request that the permit language be updated to include the new Federal regulations for landfill emissions and if approved by FDEP, the elimination of the NSPS requirements. Also, a request to modify the construction permit will be submitted to address the elimination of the NSPS requirements. The work described to conduct this service is attached hereto as **Exhibit “A”**.

ARTICLE 2. Time Schedule

Vendor anticipates work under the Scope of Services provided to be completed no later November 30, 2024.

ARTICLE 3. Budget

Vendor will perform the services described outlined herein for the amount of \$30,896.01. Vendor's fee amounts are detailed further in **Exhibit "B"** Vendor will be using rates previously established under Contract CM2685.

ARTICLE 4. Other Provisions

The Services covered by this Work Authorization will be performed in accordance with the provisions set forth in the AGREEMENT referenced above and any of its attachments or schedules. Additional terms or contract provisions whether submitted purposely or inadvertently, shall have no force or effect. This Work Authorization will become a part of the referenced AGREEMENT when executed by both parties.

Any Work Authorization entered into prior to expiration or termination set forth in the AGREEMENT shall continue in effect through the earlier of: (i) the date all of the Services thereunder have been fully completed and accepted by Nassau County, or (ii) until such time as such Work Authorization expires or is terminated in accordance with its terms or is terminated pursuant to Article 2 hereof.

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In presenting this Work Authorization, Vendor agrees that:

Unless detailed herein, all drawings, data, electronic files and other information required for this Work Authorization has been accepted by Vendor. Specifically, all electronic files have been reviewed and accepted for the purposes of this Work assignment. Any additional information, including detailed scope of services are attached.

AGREED TO BY:

BY: Sam Levin  
Print Name: Sam Levin  
Title: President  
Date: 9/10/2023

**RECOMMENDED AND APPROVED BY NASSAU COUNTY:**

Department Head/Managing Agent: Doug Podiak 9/7/2023

Procurement: Tanase Belmont 9/8/2023

Office of Management & Budget: Chris Lacambra 9/7/2023 *TL*

County Manager: Taco E. Pope 9/11/2023  
Taco E. Pope, AICP

Ex-Officio Clerk:

N/A  
John A. Crawford

County Attorney:

Denise C. May 9/11/2023

RFJ 9/11/2023

ACCOUNT NO.: 01362534-531000 \$23,789.93 01361534-531000-\$7,106.08

**Exhibit “A”  
Scope of Services**

**Preparation  
of a  
Title V Air Operations Permit Renewal Application  
and  
Construction Permit Modification  
for the  
West Nassau Class I Landfill**

**Nassau County  
S2L, Inc.’s Contract and Work Authorization Number: CM2685-WA46  
S2Li Project Number: 23-1023**

Due to the amount of solid waste disposed at the West Nassau Landfill (Facility) and since the Facility generates air emissions from its landfill gas flare, landfill surface, emergency generators, particulates (e.g. dust), etc., the Facility has been determined to be a Title V major source of air pollution in accordance with Chapter 213, Florida Administrative Code (F.A.C.) and by US Environmental Protection Agency (EPA) designation according to New Source Performance Standards (NSPS), Subpart WWW. The Facility has also been determined to be a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. In addition, the County’s on-site Reciprocating Internal Combustion Engines (RICE) (emergency backup generators are subject to Title 40, Part 63, Subpart ZZZZ (Rule) which establishes national emission limitations and operating limitations for hazardous air pollutants (HAPs). This Rule also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. Because of these determinations and other factors, Nassau County (County) has been required to obtain and maintain compliance with a Title V permit for the Facility since 1999.

The Facility’s existing Title V Permit No. 0890428-014-AV expires on November 21, 2024, and the renewal application is required to be submitted to the Florida Department of Environmental Protection (FDEP) by April 10, 2024. The renewal application and permit modification request will be electronically submitted requiring an electronic signature from the designated County’s Responsible Official (RO).

This Work Authorization will provide for the preparation and electronic submission of the West Nassau Landfill Title V operations permit renewal application and construction permit modification to FDEP. The operation’s 5-year permit renewal application will include a request that the permit language be updated to include the new Federal regulations for landfill emissions and if approved by FDEP, the elimination of the NSPS requirements. Also, a request to modify the construction permit will be submitted to address the elimination of the NSPS requirements. It should be noted that Tier II testing is being conducted under a separate Work Authorization to determine if the Facility qualifies for the elimination of the NSPS requirements. This testing and resulting FDEP approval may occur after the Title V permit renewal application has been submitted. Therefore, this scope of work addresses the preparation of a permit

modification request to eliminate the need for NSPS compliance. We will be attempting to work with FDEP to streamline the renewal process.

The following sections of this cost proposal include the scope of services to be provided, an estimated schedule, a cost estimate, and terms and conditions. Under the scope of services for this Work Authorization, S2L, Incorporated (S2Li) and Grove Scientific (collectively known as the S2Li Team) will perform the following:

## **SCOPE OF SERVICES**

### **Task 1 – Preparation of the Title V Operating Permit Renewal Application**

S2Li Team will prepare a draft permit application with supporting documents including a request to update the language of the permit to meet the current revised regulations and submit this draft to the County for review. After incorporating any comments from the County, the S2Li Team will submit the permit renewal application in electronic form under the Electronic Permit Submittal and Processing System (EPSAP) process and submit any required calculations for the emission units and any specific information on the Facility operation.

### **Task 2 Prepare an Electronic Application (EPSAP) for a Title V Air Operating Permit Renewal Application with Concurrent Processing of Air Construction Permit to Remove NSPS Requirements from Air Operating Permit**

S2Li Team will prepare a draft air construction and operating permit renewal application using EPSAP with attachments with data provided by the County. This application will request the renewal of the air operating permit as well as include the request to concurrently process an air construction permit that allows the landfill to remove the NSPS requirements from the air permit, assuming the Tier II sampling demonstrates the landfill meets the emissions limitations required for removal. After incorporating any comments from the County, S2Li Team will submit the permit application in electronic form under the EPSAP process.

### **Task 3 Response to Questions and/or Additional Information from FDEP**

This task includes the preparation of a response to one Request for Additional Information (RAI) by FDEP. The S2Li Team does not anticipate a significant effort will be required to respond to an RAI.

### **Task 4 Prepare an EPSAP for a Title V Air Operating Permit Revision Application**

Should the permit be issued by FDEP before a determination of the elimination of the NSPS requirements, the S2Li team will prepare a draft air operating permit revision application using EPSAP with attachments with data provided by the County to close out the open construction permit and incorporate the air construction conditions removing the NSPS requirement from the current operating permit. After incorporating any comments from the County, S2Li Team will submit the permit renewal application in electronic form under the EPSAP process.

## **ASSUMPTIONS**

If any new unpermitted sources that require an air construction permit are present at the West Nassau Landfill site, this will be addressed as an additional service to this work authorization.

## SCHEDULE

Work under the Scope of Services provided above will begin upon receipt of the signed Work Authorization. The S2Li Team will provide the County with a draft review copy of the applicable applications by April 1, 2024. The County will offer any comments on the application to the S2Li Team within a one-week period. Any comments received from the County will be addressed, the application finalized and then submitted electronically to FDEP by the Renewal Application Due Date of April 10, 2024. The existing permit will expire on November 21, 2024, so additional time is required to address any comments from FDEP, submit any permit modifications due to the elimination of the NSPS requirements, and review the new permit prior to the expiration date of the existing permit. The Work under this scope of services is expected to be completed by November 29, 2024. Therefore, assuming a November 1, 2023 notice to proceed date from the County, the Work under this Work Authorization will be completed in 395 days or by November 30, 2024.

## ENGINEERING SERVICES FEE ESTIMATE

The fee estimate to conduct the Work as described in the above-listed Scope of Services is **\$30,896.01**. A detailed breakdown for each task, in conjunction with the estimated labor hours and expenses, is included in the attached **Exhibit B**. Costs will be invoiced on a time and material basis. The County will be notified when the overall project budget is nearing its limit.

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August 23, 2023

EXHIBIT B

S2LI No. 23-1023  
County No. CM2685-WA46

**Total Project Costs**

S2LI Fee Estimate

**Title V Air Operations Permit Renewal Application and Construction Permit Modification**  
West Nassau Class I Landfill  
Nassau County, Florida

LABOR TASK	DESCRIPTION	LABOR CATEGORY AND RATE										TOTAL HOURS	SUBTOTAL LABOR			
		Project Dir./ Principal \$250.00	Regional Manager/ QC Officer \$232.25	Principal Engineer \$190.26	Senior Engineer \$137.09	Project Engineer \$97.92	Associate Engineer/CADD \$74.21	Field Technician \$52.38	Office Manager \$76.24	Field Vehicle (\$100/day)	Lab Testing (est.)			Equipment Rental (est.)	Parts (est.)	
1	Preparation of the Title V Operating Permit Renewal Application	2	10	4	0	4	0	4	0	0	0	4	4	28	\$4,577.02	
2	Prepare an Electronic Application (EPSAP) for a Title V Air Operating Permit Renewal Application with Concurrent Processing of Air Construction Permit to Remove NSPS Requirements from Air Operating Permit	1	3	2	0	2	0	2	0	0	0	2	2	10	\$1,675.59	
3	Response to Questions and/or Additional Information from FDEP	1	2	0	0	0	0	0	0	0	0	1	1	4	\$790.74	
4	Prepare an EPSAP for a Title V Air Operating Permit Revision Application	1	4	0	0	0	0	0	0	0	0	1	1	6	\$1,255.24	
SUBTOTALS:		5	19	6	0	6	0	6	0	4	0	8	8	48	\$8,298.59	
EXPENSES TASK												SUBTOTAL EXPENSES				
1	Preparation of the Title V Operating Permit Renewal Application	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7,568.96
2	Prepare an Electronic Application (EPSAP) for a Title V Air Operating Permit Renewal Application with Concurrent Processing of Air Construction Permit to Remove NSPS Requirements from Air Operating Permit	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,633.96
3	Response to Questions and/or Additional Information from FDEP	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,555.66
4	Prepare an EPSAP for a Title V Air Operating Permit Revision Application	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,838.84
SUBTOTALS:		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 22,597.42

**COST SUMMARY**

TASK	DESCRIPTION	S2LI LABOR	SUBTOTAL EXPENSES Including Subcontractor	TASK TOTAL
1	Preparation of the Title V Operating Permit Renewal Application	\$ 4,577.02	\$ 7,568.96	\$ 12,145.98
2	Prepare an Electronic Application (EPSAP) for a Title V Air Operating Permit Renewal Application with Concurrent Processing of Air Construction Permit to Remove NSPS Requirements from Air Operating Permit	\$ 1,675.59	\$ 8,633.96	\$ 10,309.55
3	Response to Questions and/or Additional Information from FDEP	\$ 790.74	\$ 2,555.66	\$ 3,346.40
4	Prepare an EPSAP for a Title V Air Operating Permit Revision Application	\$ 1,255.24	\$ 3,838.84	\$ 5,094.08
TOTALS		\$ 8,298.59	\$ 22,597.42	\$ 30,896.01

Estimated Fee By Landfill for County Accounting Purposes:

West Nassau Class I Lined Landfill (42 acre area): \$ 23,785.93  
West Nassau Unlined Landfill (11 acre area): \$ 7,106.08

August 21, 2023



Mr. Omar E. Smithy, P.E.  
S2Li  
531 Versailles Drive, Suite 202  
Maitland, FL 32751

**RE: West Nassau Landfill  
Proposal for Title V Air Operating Permit Renewal & Proposed Permit  
Modification**

Dear Omar:

We have prepared this proposal to prepare the Title V air operating permit renewal application at the West Nassau Landfill as well as address an air permit modification to remove the NSPS requirement from the air operating permit. The scope of work and price are outlined below;

## **SCOPE OF SERVICES**

### **TASK 1 – Prepare an Electronic Application (EPSAP) for a Title V Air Operating Permit Renewal Application**

We propose the following;

- Prepare a draft air operating permit renewal application using EPSAP with attachments with data provided by Nassau County.
- Submit the draft for County and S2Li review.
- Discuss the County's and S2Li comments in a phone conference and/or via e-mail and incorporate the agreed upon changes into the EPSAP application.
- Sign and seal the permit application by our Florida registered professional engineer and electronically submit it to FDEP via EPSAP.
- Review the draft permit and public notice and provide comments to FDEP.

6140 EDGEWATER DRIVE • SUITE F • ORLANDO, FLORIDA 32810-4810  
PHONE (407)298-2282



**Cost Task 1**

<b>Labor Description</b>	<b>Hourly Rate (\$)</b>	<b>Hours</b>	<b>Total (\$)</b>
Senior Scientist/Principal	126.57	13	1,645.41
Professional Engineer	225.00	10	2,250.00
Environmental Scientist	84.38	40	3,375.20
Paraprofessional/Administrative	59.67	5	298.35
<b>Total</b>	n/a	n/a	<b>7,568.96</b>

**TASK 2 – Prepare an Electronic Application (EPSAP) for a Title V Air Operating Permit Renewal Application with Concurrent Processing of Air Construction Permit to Remove NSPS Requirements from Air Operating Permit**

We propose the following;

- Prepare a draft air construction and operating permit renewal application using EPSAP with attachments with data provided by Nassau County. This application will request to the renewal of the air operating permit as well as include the request to concurrently process an air construction permit that allows the landfill to remove the NSPS requirements from the air permit, assuming the Tier 2 sampling demonstrates the landfill meets the emissions for removal.
- Submit the draft for County and S2Li review.
- Discuss the County's and S2Li comments in a phone conference and/or via e-mail and incorporate the agreed upon changes into the EPSAP application.

- Sign and seal the permit application by our Florida registered professional engineer and electronically submit it to FDEP via EPSAP.
- Review the draft permit and public notice and provide comments to FDEP.

**Cost Task 2**

<b>Labor Description</b>	<b>Hourly Rate (\$)</b>	<b>Hours</b>	<b>Total (\$)</b>
Senior Scientist/Principal	126.57	20	2,531.40
Professional Engineer	225.00	10	2,250.00
Environmental Scientist	84.38	40	3,375.20
Paraprofessional/Administrative	59.67	8	477.36
<b>Total</b>	n/a	n/a	<b>8,633.96</b>

**TASK 3 - Prepare response to Request for Additional Information (if needed)**

- Prepare a written response to request(s) for additional information from FDEP until they consider the application to be complete.
- Submit the draft for County and S2Li review.
- Discuss the County’s and S2Li comments in a phone conference and/or e-mail and finalize agreed upon response to FDEP.
- Sign and seal the response and submit it to FDEP.
- Review the draft permit and public notice and provide comments to FDEP.
- This scope is completed once the final draft permit is issued for public notice.

**Cost Task 3**

<b>Labor Description</b>	<b>Hourly Rate (\$)</b>	<b>Hours</b>	<b>Total (\$)</b>
Senior Scientist/Principal	126.57	5	632.85
Professional Engineer	225.00	4	900.00
Environmental Scientist	84.38	10	843.80
Paraprofessional/Administrative	59.67	3	179.01
<b>Total</b>	n/a	n/a	<b>2,555.66</b>

**TASK 4 – Prepare an Electronic Application (EPSAP) for a Title V Air Operating Permit Revision Application**

We propose the following;

- Prepare a draft air operating permit revision application using EPSAP with attachments with data provided by Nassau County to close out the open construction permit and incorporate the air construction conditions removing the NSPS requirement from the current operating permit.
- Submit the draft for County and S2Li review.
- Discuss the County's and S2Li comments in a phone conference and/or via e-mail and incorporate the agreed upon changes into the EPSAP application.
- Sign and seal the permit application by our Florida registered professional engineer and electronically submit it to FDEP via EPSAP.
- Review the draft permit and public notice and provide comments to FDEP.

**Cost Task 4**

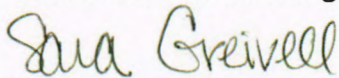
<b>Labor Description</b>	<b>Hourly Rate (\$)</b>	<b>Hours</b>	<b>Total (\$)</b>
Senior Scientist/Principal	126.57	8	1,012.56
Professional Engineer	225.00	4	900.00
Environmental Scientist	84.38	20	1,687.60
Paraprofessional/Administrative	59.67	4	238.68
<b>Total</b>	n/a	n/a	<b>3,838.84</b>

**Other Considerations**

This quote assumes that the landfill has all documents up to date as required by the current Title V air permit and that this information is correct and accurate. If there are any new unpermitted sources that require an air construction permit, this will be addressed in a separate scope of work and price quote.

Please let me know if you have any questions regarding this quote.

Sincerely,  
Grove Scientific & Engineering Company



Sara Greivell  
President

