

**From:** [Dertien, Joe](#)  
**To:** [Fischer, Shane](#)  
**Cc:** [Ciaravella, Philip](#); [Robert.shankle](#); [Bryan White](#); [Lebron, Carlo](#)  
**Subject:** RE: Lena Road Landfill Draft Response to RAI 5-Year Ops Permit Submittal  
**Date:** Thursday, June 3, 2021 2:01:06 PM

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Shane,

The additional information provided in your 6/3/21 email (stated below) serves as a supplement to your 5/12/21 RAI response. No additional information is required. The response to the request for additional information is considered complete.

If you have any questions, please call me at your convenience.

Joe



**Joe Dertien, P.E.**  
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**From:** Fischer, Shane <[SFischer@SCSEngineers.com](mailto:SFischer@SCSEngineers.com)>  
**Sent:** Thursday, June 3, 2021 1:23 PM  
**To:** Dertien, Joe <[Joe.Dertien@dep.state.fl.us](mailto:Joe.Dertien@dep.state.fl.us)>  
**Cc:** [Robert.shankle](mailto:Robert.shankle@mymanatee.org) <[Robert.shankle@mymanatee.org](mailto:Robert.shankle@mymanatee.org)>; [Bryan White](mailto:Bryan White) <[bryan.white@mymanatee.org](mailto:bryan.white@mymanatee.org)>; [Lebron, Carlo](mailto:CLEbron@scsengineers.com) <[CLEbron@scsengineers.com](mailto:CLEbron@scsengineers.com)>  
**Subject:** Lena Road Landfill Draft Response to RAI 5-Year Ops Permit Submittal

Joe,

As discussed during our telephone conversation on May 28, 2021 and again on June 2, 2021, you have requested additional information beyond what was provided by SCS and the County in our responses to RAI No. 1 submitted and dated May 12, 2021 addressing the “fraction of gas used for beneficial use versus flared gas” within FDEP comment 1.a.

As stipulated in Florida Statutes 403.708 (12)(c)1. Yard Waste is allowed to be disposed of in a “.Class I landfill uses an active gas-collection system to collect landfill gas generated at the disposal facility and provides or arranges for a beneficial use of the gas.” There is no requirement for what fraction of the landfill gas needs to be used for a beneficial reuse project. The amount of landfill gas beneficially used varies tremendously over time. In our May 12, 2021 response we provided the upper limits of landfill gas usage based on the FDEP Title V air permit issued to Manatee County for the Lena Road Landfill. A lower limit of beneficial reuse of landfill gas per year depends on down time and operational challenges the equipment may encounter. For example, in 2019, the fractional amount of landfill gas used for beneficial use versus flared was 80% versus 20%, respectively. In

2020 those amounts were 9% vs 91%. As you can see, this “fraction” was very different year over year. Because the actual flows to each control device have the potential to vary widely it is difficult to provide actual fractions of the entire landfill gas flow as requested. Should you need actual numbers we propose the following:

- Fraction of landfill gas to flare is 0-100%.
- Fraction of landfill gas to the engine is 0-80+%.
- Fraction of landfill gas to the sludge dryer is 0-50+%.

It should be noted that even though these numbers are based on recent past performance of the system they too could vary outside of these ranges while the landfill gas system remains in compliance with the Title V Operations Permit.

As you indicated during our June 2, 2021 call, these fractional uses listed above will not be used as an Operation Permit condition. Additionally, the “fraction of gas used for beneficial use versus flared gas” is clearly the intent of the County in utilizing large capacity capital investment components for reusable energy projects. Both the landfill gas to energy and the sludge biosolids dryer systems are examples of the County progressively utilizing renewable energy processes for beneficial use.

Based on this email submittal, what will we need to submit for Agency approval of the application? Will this be sufficient and the request for information is deemed complete or will I need to provide the Agency with something signed and sealed that is contained within this email?

Thanks

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