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26 October 2020

Department of Environmental Protection

Division of Air Resource Management

Office of Permitting and Compliance

2600 Blair Stone Road MS #5505

Tallahassee, Florida, 32399-2400

RE: Comments/Concerns - Draft Air Permit No. [0210051-027-AC](https://fldep.dep.state.fl.us/air/emission/apds/default.asp) Waste Management, Inc. of Florida, Collier County Landfill Collier County, Florida

Sir/Madam,

Golden Gate Estates Area Civic Association (GGEACA) has concerns about the issuance of this air permit for an open flare. Golden Gate Estates is the largest residential community in Collier County and it borders the Waste Management, Inc (WMI) operation on its sw border.

In the last 10 years the residents of the Estates Community has had to deal with 2-3 major wildfires and 1 major open fire issue with an improperly operated vegetative recycling business (Environmental Turnkey Solutions; ETS) in Collier County.

In all cases there was insufficient attention paid to operational issues that led to these community threatening events.

In the case of the permit to be issued to Waste Management:

1. Methane is documented as a “highly flammable” gas. That can explode if ignited under certain circumstances.
2. Is the methane gas produced at the landfill a day to day significant ignition/fire source?
3. Are the vehicles, machines and other electrical devices operated onsite considered an “ignition source,” safe not to start an explosion / wildfire event in the community?
4. Can embers from an adjacent wildfire cause an explosion or enhance wildfire conditions to the methane gas source onsite?
5. Are there periodic checks to detect if methane is leaking from the source area?
6. This location will be less than a 1000 feet from the Collier County Paradise Sports Park. Will the methane gas present and the flare a danger to this UNAWARE people from inhalation, fire or explosion?
7. Will smell be an issue to people using the Paradise Sport Park?
8. What are the emergency response protocols, procedures, neighborhood notifications for methane, fire, explosions?
9. WMI has never met with the community about safety

Looking forward to your responses.

Michael R. Ramsey

President, Golden Gate Estates Area Civic Association

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