



WASTE MANAGEMENT

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May 14, 2003

Ted Hull
Air Quality Engineer
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

RE: Title V Permit Application
Application Number: 2619
Plant Number: A1812
Equipment Location: Kirby Canyon Landfill Facility
910 Coyote Creek Golf Drive
San Jose, CA 95198

Dear Mr. Hull:

Waste Management (WM) is pleased to provide comments on the Kirby Canyon Landfill (Plant Number A1812) Proposed Title V permit. WM originally submitted its Title V application on April 6, 2001 and it was assigned application number 2619 by the Bay Area Air Quality Management District (BAAQMD). WM submitted Comments to the Draft Title V Permit on December 16, 2002 and received a Response from the BAAQMD on February 18, 2003.

WM appreciated the BAAQMD February 18, 2003 response to its December 16, 2002 comment letter on the Draft Title V Permit. The comments presented in this letter are to clarify and make the Proposed Title V consistent with the BAAQMD response letter.

This comment letter is structured in the order that items appear in the permit. Where items appear multiple times in the permit the comments for each item are described when it first appears and then is referenced later when it appears again.

Section I Standard Conditions

WM has no comments on this Section.

Section II Equipment

Table II-A S-1 Landfill

The table for source S-1 "The Landfill" lists the maximum waste acceptance rate of 2,600 tons per day and 33 gas collection wells.

Section VI Permit Conditions, Condition Number 1437 S-1 Landfill and A-10 Landfill Gas Flare Part 1.a states that "*Except for temporary situations approved by the Local Enforcement Agency, the total waste accepted and placed at the landfill shall not exceed 2600 tons in any day*". WM requests that the "*Max. Acceptance Rate = 2600 tons/day*" listed in Table II-A S-1 Landfill be annotated to state that "*Max. Acceptance Rate = 2600 tons/day **except for temporary situations approved by the LEA.***" This will provide consistency between the capacities established in Table II as the maximum allowable capacities pursuant to Section I.J and the capacities established by Permit Conditions in Section VI.

The proposed Title V permit lists the maximum allowable gas collection wells as 33. Although 33 wells were listed in our December 16, 2002 comment letter, a thorough review of the wellfield indicates there are only 31 wells at the landfill. WM requests that the number of wells be changed from 33 to 31 wells to accurately reflect landfill operations.

Table II-A S-2 IC Engine Generator Set

WM has no comments on this Section.

Section III Generally Applicable Requirements

WM has no comments on this Section.

Section IV Source-Specific Applicable Requirements

Table IV-A S-1 Landfill and A-10 Landfill Gas Flare, Regulation 8, Rule 2, Page 11

WM requests that BAAQMD Regulation 8, Rule 2 be removed from Table IV-A on page 11. This request is to provide consistency throughout the Proposed Permit with the Permit Shield in Section IX. The Permit Shield states that compliance with Regulation 8, Rule 40 for low VOC content soil (i.e. less than 50 ppm by weight) subsumes compliance with Regulation 8, Rule 2. Thus, compliance with Regulation 8, Rule 2 is no longer necessary.

Table IV-B S-2 IC Engine Generator Set

WM has no comments on this Table.

Section V Schedule of Compliance

WM has no comments on this Section

Section VI Permit Conditions

Condition #1437 S-1 Landfill and A-10 Landfill Gas Flare

Condition #1437 Part 6 Page 35

This item lists the number of wells at the site, as well as the number of wells for which an ATC has been issued. The combined total is 33 wells, as stated as the “maximum number of wells at the landfill” in Table II-A.

As stated in Section II, WM requests the number of wells at the site be changed from 33 to 31. This reflects the actual number of wells present at the site.

Condition #1437 Part 10 Page 37

This item requires total reduced sulfur compound monitoring (measured as hydrogen sulfide) of the landfill gas on a quarterly basis. WM appreciates the addition of *measured as hydrogen sulfide* to this condition as requested in our December 16, 2002 comment letter. WM also requested in this comment letter a change in the hydrogen sulfide monitoring frequency from quarterly to annual. The Proposed Permit states that hydrogen sulfide monitoring is required quarterly. WM requests that the hydrogen sulfide monitoring frequency be changed from quarterly to annually. The original Title V permit basis statement states that measurements of sulfur in the landfill gas in 1998, 1999, and 2000 have averaged 46 PPMv. This demonstrates that the landfill gas sulfur content is over an order of magnitude less than the limits. Because of the low hydrogen sulfide concentrations WM believes that annual monitoring of hydrogen sulfide concentrations is sufficient to demonstrate ongoing compliance.

Section VII Applicable Limits and Compliance Monitoring Requirements

Table VII-A S-1 Landfill and A-10 Landfill Gas Flare

Table VII-A Total Carbon Limit Page 48

As stated above in Section IV, Table IV-A S-1 Landfill and A-10 Landfill Gas Flare, Regulation 8, Rule 2, Page 11, WM requests that BAAQMD Regulation 8 Rule 2 be removed from Table VII-A on page 48. This request is to provide

consistency throughout the Proposed Permit with the Permit Shield in Section IX. The Permit Shield states that compliance with Regulation 8, Rule 40 for low VOC content soil (i.e. less than 50 ppm by weight) subsumes compliance with Regulation 8, Rule 2. Thus, compliance with Regulation 8, Rule 2 is no longer necessary.

Table VII-A SO₂ and Total Sulfur Content in Landfill Gas Limits Page 50

As stated above in Section VI Permit Conditions, Condition #1437 S-1 Landfill, and A-10 Landfill Gas Flare, New Part 10 Page 37, WM requests that the monitoring type in these two items be changed from sulfur analysis of landfill gas to hydrogen sulfide analysis of landfill gas and that the frequency be changed from quarterly to annually. WM had requested this change in our December 16, 2002 comment letter.

Table VII-A Amount of Waste Accepted Limit Page 51

The BAAQMD stated in its February 18, 2003 response letter to WM's December 16, 2002 comment letter that the landfill maximum design capacity of 36.4 million cubic yards includes only solid waste refuse and does not include cover materials. Table VII-A, page 51 "Amount of Waste Accepted" shows the 36.4 million cubic yard capacity which is annotated to state "*(cumulative amount of all wastes and cover materials)*." WM requests that this annotation be changed to "*(cumulative amount of all wastes ~~and cover materials~~)*". The deletion of "*and cover materials*" will make this Table consistent with the rest of the Proposed Title V Permit and the BAAQMD February 18, 2003 response stating that capacity only includes wastes.

For the reasons stated above in Section II Equipment, Table II-A S-1 Landfill, WM requests that the "*Amount of Waste Accepted <= 2600 tons/day*" listed in Table VII-A on Page 51 be annotated to state "*Amount of Waste Accepted <= 2600 tons/day (except for temporary situations approved by the LEA)*" This will provide consistency between the capacities established in Table VII-A and capacities established by Permit Conditions in Section VI.

Table VII-B S-2 IC Engine Generator Set

Table VII-B SO₂ Limit Page 53

As stated above in Section VI Permit Conditions, Condition #1437 S-1 Landfill and A-10 Landfill Gas Flare, Part 10 Page 37, WM requests that the monitoring type in this item be changed from sulfur analysis of landfill gas to hydrogen sulfide analysis of landfill gas, and that the frequency be changed from quarterly to annually. WM had requested this change in our December 16, 2002 comment letter.

VIII Test Methods

WM has no comments on this Section

IX Permit Shield

WM appreciates the incorporation of Permit Shield with regards to Regulation 8, Rule 2, Section 301. However, WM would like to request that an affirmative statement be added that compliance with Regulation 8, Rule 40, Section 604 demonstrates compliance with Regulation 8, Rule 2, Section 301. WM suggests the following language be added to the Permit Shield "**Measurements conducted under Regulation 8-40-604 that show surface VOC concentrations less than 50 ppmv (expressed as methane,C1) are conclusive to demonstrate that Regulation 8-2-301 does not apply.**"

WM again appreciates the opportunity to provide comments on the Proposed Title V permit for the Kirby Canyon Landfill.

If you have any questions regarding our comments, please do not hesitate to contact me at 510-613-0256

Sincerely,

WASTE MANAGEMENT


Guy R. Petrabor, PE
Western Group Engineer

Cc: File - (1)
Mr. Joe Morse - KCRDF (1)
Mr. Eddie Pettit - KCRDF (1)
Mr. Paul Stout - EMCON/OWT (1)