

# **Bay Area Air Quality Management District**

939 Ellis Street  
San Francisco, CA 94109  
(415) 771-6000

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## **STATEMENT OF BASIS**

**for**

### **MAJOR FACILITY REVIEW PERMIT: MINOR REVISION**

**for**

**West Contra Costa Sanitary Landfill, Inc.  
Facility #A1840**

**Facility Address:**

Foot of Parr Boulevard  
Richmond, CA 94801

**Mailing Address:**

3260 Blume Drive, Suite 200  
Richmond, CA 94806

Permit Engineer: Carol Allen

Minor Revision to Include the Inactive Hazardous Waste Management Facility (S-46) and Flare (A-11) and Miscellaneous Administrative Corrections

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## **Title V Statement of Basis for MFR Permit: Minor Revision**

West Contra Costa Sanitary Landfill, Inc.; PLANT # 1840

APPLICATIONS # 2789 and # 8514

### **A. Background**

As discussed in the most recent Statement of Basis for the Major Facility Review (MFR) Permit for the West Contra Costa Sanitary Landfill (Site # A1840), this facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. This facility received its initial Title V permit on May 29, 2002 with an expiration date of April 30, 2007. In July 2004, the District reopened the permit to add the NESHAP for Municipal Solid Waste Landfills (40 CFR 63, Subpart AAAA) and to make other administrative amendments and minor revisions. The revised permit was issued on September 29, 2004.

The main purpose of this current action is to make minor MFR permit revisions pursuant to Permit Applications # 2789 and # 8514. Applications # 2789 and # 8514 concern the loss of exemption permitting of the S-46 Hazardous Waste Management Facility (HWMF), which is a closed hazardous waste disposal unit that is located on contiguous property with the main active landfill (S-15) at this facility. Application # 2789 includes the issuance of a Permit to Operate for S-46 and the issuance of an Authority to Construct for the landfill gas collection system at S-46. Application # 8514 includes the issuance of an Authority to Construct for the A-11 Landfill Gas Flare that will control the landfill gas collected from S-46.

Applications # 2789 and # 8514 do not involve (a) Part 51 or Part 52 major modifications, (b) NSPS, NESHAPS, or Section 112 modifications, (c) monitoring relaxations, (d) establishment of permit terms to avoid a requirement, (e) establishment of or change to case-by-case emission limits or standards, (f) changes to ambient impact, visibility analysis, or increment analysis determinations, or (g) incorporation of any newly promulgated federal requirements. Therefore, these revisions are not significant and do not require a public notice.

In addition to the minor revisions discussed above, the District is proposing to make several administrative amendments to this MFR permit that are necessary to correct typographical errors, update regulatory amendment dates, clarify requirements, and include several state and BAAQMD regulations. Including the new state and BAAQMD rules qualifies as an administrative amendment, because these rules are not federally enforceable. On November 8, 2004, CARB adopted an ATCM for stationary internal combustion engines. Since this ATCM and CARB's Portable Equipment requirements may apply to equipment at located at this facility, these regulations will be added to appropriate sections of this MFR Permit. On June 15, 2005, BAAQMD adopted Regulation 2, Rule 5, New Source Review of Toxic Air Contaminants, which replaced the BAAQMD's Toxic Risk Management Policy as of July 1, 2005. The June

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15, 2005 board action also amended numerous regulations by deleting references to the BAAQMD's Risk Management Policy and adding references to Regulation 2, Rule 5. Since Regulation 2, Rule 5 applies to all new and modified sources, it will be included in this MFR Permit, wherever applicable. And finally, the amendment dates for Regulation 2, Rules 1 and 2 and Regulation 8, Rules 34, 40, and 47 will be corrected throughout this permit as a result of the June 15, 2005 amendments.

This document will discuss the minor revisions proposed pursuant to Applications # 2789 and # 8514. The engineering evaluations for these two applications are enclosed in Appendix A and contain detailed discussions of the proposed permit revisions. The proposed administrative amendments are discussed in detail below. The proposed permit shows all changes to the existing permit in strikeout/underline format. The permit will be formally re-issued after EPA's 45-day review period is complete.

## **B. Facility Description**

The West Contra Costa Sanitary Landfill, Inc. (WCCSL) site includes both an active landfill (S-15) and an inactive Hazardous Waste Management Facility (HWMF) that is located on contiguous property with the active landfill. Existing equipment includes a landfill gas collection system for the active landfill, an enclosed ground flare (A-8) and three internal combustion engines (S-5, S-6, and S-37) that are burning collected landfill gas from the active landfill, and leachate treatment equipment (S-22, S-23, S-24, S-25, S-26, S-27, S-28, S-29, S-30, S-38, S-39, S-40, A-1, A-2, A-3, A-4, A-5, and A-6).

The District is proposing to add the S-46 inactive HWMF, the gas collection system for S-46, and an enclosed Landfill Gas Flare (A-11) that will control the landfill gas that will be collected from S-46.

## **C. Permit Content**

Since Statements of Basis were prepared for the initial MFR Permit and the July 2004 reopening of this MFR Permit that fully describe and explain the legal and factual basis for the MFR Permit, this report will only address the proposed revisions to the MFR Permit associated with Applications # 2789 and # 8514 and the proposed administrative amendments that are necessary to correct errors and update citations. Changes to the permit sections are described in the order that they are presented in the permit.

On the Title Page, the District contact is being changed from Carol Allen to Jane Lundquist due to recent BAAQMD staff reassignments.

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## **I. Standard Conditions**

This section contains administrative requirements and conditions that apply to all facilities. The District is proposing to make the following corrections to the standard conditions in Section I:

- Update regulatory amendment dates in Section I.A.
- Clarify these standard conditions by adding Section I.B.12 and revising Section I.G.
- Correct the bases for Sections I.B.11, I.E.2, and I.F.

The specific proposed revisions are identified below.

### **A. Administrative Requirements**

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 5/2/01);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 6/28/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on ~~8/4/04~~6/15/05);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on ~~5/17/00~~6/15/05);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on ~~5/17/00~~12/21/04);

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 1/26/99); and

BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review

(as amended by the District Board on 4/16/03).

### **B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review**

...

11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certifications shall be signed by a responsible official for the facility. (Regulation 2-6-409.20, MOP Volume II, Part 3, §4.11)

12. The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307)

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**E. Records**

...

2. Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of creation of the record. (Regulation 2-6-501, ~~Regulation 3~~; MOP Volume II, Part 3, §4.7)

**F. Monitoring Reports**

...

- (Regulation 2-6-502, ~~Regulation 3~~; MOP Volume II, Part 3, §4.7)

**G. Compliance Certification**

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be May 1st ~~to~~ through April 30th. The certification shall ...

**II. Equipment**

This section of the permit lists all permitted or significant sources and all abatement or control devices for these sources. This minor revision action will add the S-46 HWMF and the associated landfill gas collection and control systems (A-11) to this permit. The District is also proposing to correct Table II-B for the existing A-8 Landfill Gas Flare by adding the 3 hour averaging period to the minimum combustion zone temperature limit. The proposed revisions to Tables II-A and II-B are shown below.

**Table II A - Permitted Sources**

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
...				
S-46	<u>Hazardous Waste Management Facility (HWMF) equipped with landfill gas collection system</u>	<u>inactive hazardous waste disposal unit horizontal collectors</u>		<u>210,700 tons of decomposable waste 19 collectors (under construction)</u>

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**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
...					
A-8	Landfill Gas Flare, burning landfill gas, 45 MM BTU/hour	S-15	BAAQMD 8-34-301.3, see also Table IV-B	Minimum combustion zone temperature of 1400 °F (3 hour average), see also Table VII-B	Either 98% destruction of NMOC or < 30 ppmv of NMOC, as CH <sub>4</sub> , at 3% O <sub>2</sub> , dry, see also Table VII-B
A-11	<u>Landfill Gas Flare for HWMF, Perennial Energy, Inc., Model # F-58-16-E, burning landfill gas, 5.25 MM BTU/hour (under construction)</u>	<u>S-46</u>	<u>BAAQMD 8-34-301.3, see also Table IV-G</u>	<u>Minimum combustion zone temperature of 1400 °F (3 hour average), see also Table VII-G</u>	<u>Either 98% destruction of NMOC or &lt; 30 ppmv of NMOC, as CH<sub>4</sub>, at 3% O<sub>2</sub>, dry, see also Table VII-G</u>

**III. Generally Applicable Requirements**

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources, portable equipment, and temporary sources that may not require a District permit.

Text Revisions

In the introductory language for this section, the District is proposing to include EPA’s website address for SIP amendments and to correct typographical errors. The proposed revisions are listed below.

...

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

Statement of Basis:  
Applications # 2789 and 8514

Site A1840, West Contra Costa Sanitary Landfill, Inc.  
Foot of Parr Boulevard, Richmond, CA 94901

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The full language of SIP requirements is on EPA Region 9's website. The address is: ~~included at the end of this permit.~~

<http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions>.

...

### Table III Revisions

In Table III, the District is proposing to update several regulatory amendment dates, correct several typographical errors, and to add three non-federally enforceable regulations: BAAQMD Regulation 2, Rule 5, New Source Review of Toxic Air Contaminants, CARB ATCM for stationary compression ignition engines, and California H&S Code requirements for portable equipment. The proposed revisions to Table III are shown below.

**Table III  
Generally Applicable Requirements**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
...		
BAAQMD Regulation 2, Rule 1	General Requirements ( <del>8/1/04</del> 6/15/05)	N
BAAQMD 2-1-429	Federal Emissions Statement (6/7/95)	Y
SIP Regulation 2, Rule 1	General Requirements (1/26/99)	Y <sup>1</sup>
<u>BAAQMD Regulation 2, Rule 5</u>	<u>New Source Review of Toxic Air Contaminants (6/15/05)</u>	<u>N</u>
...		
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (11/21/01)	<del>NY</del>
BAAQMD Regulation 8, Rule 4	Organic <u>e</u> Compounds - General Solvent and Surface Coating Operations (10/16/02)	Y
...		
BAAQMD Regulation 8, Rule 40	Organic Compounds – Aeration of Contaminated Soil and Removal of Underground Storage Tanks ( <del>12/15/99</del> 6/15/05)	Y
BAAQMD 8-40-116	Exemption, Small Volume	Y
BAAQMD 8-40-117	Exemption, Accidental Spills	Y
BAAQMD Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations ( <del>6/15/94</del> 6/15/05)	Y
...		
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/17/02)	N
<del>BAAQMD</del> -SIP Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (2/26/02)	Y <sup>1</sup>
...		



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**Table III  
Generally Applicable Requirements**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>
<u>California Code of Regulations Title 17, Section 93115</u>	<u>Airborne Toxic Control Measure for Stationary Compression Ignition Engines (11/8/04)</u>	<u>N</u>
<u>California Health and Safety Code Section 41750 et seq.</u>	<u>Portable Equipment</u>	<u>N</u>
...		

**IV. Source-Specific Applicable Requirements**

This section of the permit lists all the applicable requirements that apply to permitted or significant sources. The text of the requirements is found in the regulations, which are readily available on the District’s or EPA’s websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this statement of basis.

Administrative Amendments:

In the introductory language for this section, the District is proposing to include EPA’s website address for SIP amendments and to correct typographical errors. Tables IV-A, IV-B, IV-E, and IV-F list regulations that were amended on June 15, 2005. As discussed previously, the June 15 amendments added a reference to the District new Regulation 2, Rule 5 and deleted references to the obsolete Risk Management Policy. These amendments did not impact any limit or standard and were strictly non-substantive in nature. For the MFR Permit at this site, the District is proposing to update the regulatory amendment dates for Regulation 2, Rules 1 and 2 and Regulation 8, Rules 34, 40, and 47. The proposed revisions are listed below.

...

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions,

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of this permit. The full language of SIP requirements is on EPA Region 9's website. The address is: ~~included at the end of this permit.~~

<http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions>. All other text may be found in the regulations themselves.

...

**Table IV – A**  
**Source-Specific Applicable Requirements**  
**S-5 INTERNAL COMBUSTION LEAN BURN ENGINE; AND**  
**S-6 INTERNAL COMBUSTION LEAN BURN ENGINE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
...			
BAAQMD Regulation 8, Rule 34	Organic Compounds - Solid Waste Disposal Sites ( <del>10/6/99</del> <u>6/15/05</u> )		
...			

**Table IV – B**  
**Source-Specific Applicable Requirements**  
**S-15 WEST CONTRA COSTA SANITARY LANDFILL; AND**  
**A-8 LANDFILL GAS FLARE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
...			
BAAQMD Regulation 8, Rule 34	Organic Compounds - Solid Waste Disposal Sites ( <del>10/6/99</del> <u>6/15/05</u> )		
...			

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**Table IV – E**  
**Source-Specific Applicable Requirements**  
**S-30 AIR STRIPPER;**  
**A-3 CARBON ADSORBER; A-4 CARBON ADSORBER;**  
**A-5 CARBON ADSORBER; AND A-6 CARBON ADSORBER**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 47	Air Stripping and Soil Vapor Extraction Operations ( <del>6/15/94</del> 6/15/05)		
...			

**Table IV – F**  
**Source-Specific Applicable Requirements**  
**S-37 INTERNAL COMBUSTION LEAN BURN ENGINE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
...			
BAAQMD Regulation 8, Rule 34	Organic Compounds - Solid Waste Disposal Sites ( <del>10/6/99</del> 6/15/05)		
...			

Complex Applicability Determinations:

The engineering evaluation for Application # 8514 contains a detailed applicability discussion for the S-46 HWMF. In summary, the facility added municipal solid waste (MSW) to the HWMF in 2000 and 2001 in order to bring the area up to final closure grade. The addition of this MSW required that a landfill gas collection and control system be installed at S-46 pursuant to BAAQMD Regulation 8, Rule 34 and the Emission Guidelines for MSW Landfills (40 CFR Part 60, Subpart Cc). The installation of a landfill gas collection system at S-46 also triggered a permit requirement for S-46 pursuant to BAAQMD Regulation 2, Rule 1. All applicable requirements for the S-46 HWMF with Landfill Gas Collection System and the A-11 Landfill Gas Flare for HWMF are listed in the new Table IV-G shown below.

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**Table IV – G**  
**Source-Specific Applicable Requirements**  
**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION**  
**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
<b>BAAQMD Regulation 1</b>	<b>General Provisions and Definitions (5/2/01)</b>		<b>upon start-up of A-11</b>
1-523	Parametric Monitoring and Recordkeeping Procedures	N	
1-523.1	Reporting requirement for periods of inoperation > 24 hours	Y	
1-523.2	Limit on duration of inoperation	Y	
1-523.3	Reporting requirement for violations of any applicable limits	N	
1-523.4	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	
1-523.5	Maintenance and calibration	N	
<b>SIP Regulation 1</b>	<b>General Provisions and Definitions (6/28/99)</b>		<b>upon start-up of A-11</b>
1-523	Parametric Monitoring and Recordkeeping Procedures	Y <sup>1</sup>	
1-523.3	Reports of Violations	Y <sup>1</sup>	
<b>BAAQMD Regulation 6</b>	<b>Particulate Matter and Visible Emissions (12/19/90)</b>		<b>upon start-up of A-11</b>
6-301	Ringelmann No. 1 Limitation (applies to A-11 Flare only)	Y	
6-305	Visible Particles (applies to A-11 Flare only)	Y	
6-310	Particle Weight Limitation (applies to A-11 Flare only)	Y	
6-401	Appearance of Emissions (applies to A-11 Flare only)	Y	
<b>BAAQMD Regulation 8, Rule 34</b>	<b>Organic Compounds – Solid Waste Disposal Sites (6/15/05)</b>		
8-34-113	Limited Exemption, Inspection and Maintenance	Y	upon start-up of A-11
8-34-113.1	Emission Minimization Requirement	Y	
8-34-113.2	Shutdown Time Limitation	Y	
8-34-113.3	Recordkeeping Requirement	Y	
8-34-117	Limited Exemption, Gas Collection System Components	Y	upon start-up of A-11
8-34-117.1	Necessity of Existing Component Repairs/Adjustments	Y	
8-34-117.2	New Components are Described in Collection and Control System Design Plan	Y	
8-34-117.3	Meets Section 8-34-118 Requirements	Y	
8-34-117.4	Limits on Number of Wells Shutdown	Y	

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**Table IV – G**  
**Source-Specific Applicable Requirements**  
**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION**  
**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
8-34-117.5	<u>Shutdown Duration Limit</u>	<u>Y</u>	
8-34-117.6	<u>Well Disconnection Records</u>	<u>Y</u>	
8-34-118	<u>Limited Exemption, Construction Activities</u>	<u>Y</u>	<u>upon start-up of A-11</u>
8-34-118.1	<u>Construction Plan</u>	<u>Y</u>	
8-34-118.2	<u>Activity is Required to Maintain Compliance with this Rule</u>	<u>Y</u>	
8-34-118.3	<u>Required or Approved by Other Enforcement Agencies</u>	<u>Y</u>	
8-34-118.4	<u>Emission Minimization Requirement</u>	<u>Y</u>	
8-34-118.5	<u>Excavated Refuse Requirements</u>	<u>Y</u>	
8-34-118.6	<u>Covering Requirements for Exposed Refuse</u>	<u>Y</u>	
8-34-118.7	<u>Installation Time Limit</u>	<u>Y</u>	
8-34-118.8	<u>Capping Required for New Components</u>	<u>Y</u>	
8-34-118.9	<u>Construction Activity Records</u>	<u>Y</u>	
8-34-301	<u>Landfill Gas Collection and Emission Control System Requirements</u>	<u>Y</u>	
8-34-301.1	<u>Continuous Operation</u>	<u>Y</u>	<u>upon start-up of A-11</u>
8-34-301.2	<u>Collection and Control Systems Leak Limitations</u>	<u>Y</u>	<u>Upon Installation of Collection Systems and A-11</u>
8-34-301.3	<u>Limits for Enclosed Flares</u>	<u>Y</u>	<u>upon start-up of A-11</u>
8-34-303	<u>Landfill Surface Requirements</u>	<u>Y</u>	
8-34-304	<u>Gas Collection System Installation Requirements</u>	<u>Y</u>	
8-34-304.1	<u>Based on Waste Age For Inactive or Closed Areas</u>	<u>Y</u>	
8-34-304.2	<u>Based on Waste Age For Active Areas</u>	<u>Y</u>	
8-34-304.3	<u>Based on Amount of Decomposable Waste Accepted</u>	<u>Y</u>	
8-34-304.4	<u>Based on NMOC Emission Rate</u>	<u>Y</u>	
8-34-305	<u>Wellhead Requirements</u>	<u>Y</u>	<u>upon start-up of A-11</u>
8-34-305.1	<u>Operate Under Vacuum</u>	<u>Y</u>	
8-34-305.2	<u>Temperature &lt; 55 °C</u>	<u>Y</u>	
8-34-305.3	<u>Nitrogen &lt; 20% or</u>	<u>Y</u>	

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**Table IV – G**  
**Source-Specific Applicable Requirements**  
**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION**  
**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<b><u>Applicable Requirement</u></b>	<b><u>Regulation Title or Description of Requirement</u></b>	<b><u>Federally Enforceable (Y/N)</u></b>	<b><u>Future Effective Date</u></b>
8-34-305.4	Oxygen < 5%	Y	
8-34-405	Design Capacity Reports	Y	
8-34-408	Collection and Control System Design Plans	Y	
8-34-408.2	Sites With Existing Collection and Control Systems	Y	
8-34-411	Annual Report	Y	
8-34-412	Compliance Demonstration Tests	Y	upon start-up of A-11
8-34-413	Performance Test Report	Y	upon start-up of A-11
8-34-414	Repair Schedule for Wellhead Excesses	Y	upon start-up of A-11
8-34-414.1	Records of Excesses	Y	
8-34-414.2	Corrective Action	Y	
8-34-414.3	Collection System Expansion	Y	
8-34-414.4	Operational Due Date for Expansion	Y	
8-34-415	Repair Schedule for Surface Leak Excesses	Y	
8-34-415.1	Records of Excesses	Y	
8-34-415.2	Corrective Action	Y	
8-34-415.3	Re-monitor Excess Location Within 10 Days	Y	
8-34-415.4	Re-monitor Excess Location Within 1 Month	Y	
8-34-415.5	If No More Excesses, No Further Re-Monitoring	Y	
8-34-415.6	Additional Corrective Action	Y	
8-34-415.7	Re-monitor Second Excess Within 10 days	Y	
8-34-415.8	Re-monitor Second Excess Within 1 Month	Y	
8-34-415.9	If No More Excesses, No Further Re-monitoring	Y	
8-34-415.10	Collection System Expansion for Third Excess in a Quarter	Y	
8-34-415.11	Operational Due Date for Expansion	Y	
8-34-416	Cover Repairs	Y	
8-34-501	Operating Records	Y	
8-34-501.1	Collection System Downtime	Y	upon start-up of A-11
8-34-501.2	Emission Control System Downtime	Y	upon start-up of A-11
8-34-501.3	Continuous Temperature Records (applies to A-11 Flare)	Y	upon start-up of A-11
8-34-501.4	Testing	Y	

Statement of Basis:  
Applications # 2789 and 8514

Site A1840, West Contra Costa Sanitary Landfill, Inc.  
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**Table IV – G**  
**Source-Specific Applicable Requirements**  
**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION**  
**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<b><u>Applicable Requirement</u></b>	<b><u>Regulation Title or Description of Requirement</u></b>	<b><u>Federally Enforceable (Y/N)</u></b>	<b><u>Future Effective Date</u></b>
8-34-501.6	<u>Leak Discovery and Repair Records</u>	Y	
8-34-501.7	<u>Waste Acceptance Records</u>	Y	
8-34-501.8	<u>Non-decomposable Waste Records</u>	Y	
8-34-501.9	<u>Wellhead Excesses and Repair Records</u>	Y	<u>upon start-up of A-11</u>
8-34-501.10	<u>Gas Flow Rate Records for All Emission Control Systems</u>	Y	<u>upon start-up of A-11</u>
8-34-501.12	<u>Records Retention for 5 Years</u>	Y	
8-34-503	<u>Landfill Gas Collection and Emission Control System Leak Testing</u>	Y	
8-34-504	<u>Portable Hydrocarbon Detector</u>	Y	
8-34-505	<u>Well Head Monitoring</u>	Y	<u>upon start-up of A-11</u>
8-34-506	<u>Landfill Surface Monitoring</u>	Y	
8-34-507	<u>Continuous Temperature Monitor and Recorder (applies to A-11 Flare)</u>	Y	<u>upon start-up of A-11</u>
8-34-508	<u>Gas Flow Meter</u>	Y	<u>upon start-up of A-11</u>
8-34-510	<u>Cover Integrity Monitoring</u>	Y	
<b><u>BAAQMD Regulation 9, Rule 1</u></b>	<b><u>Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)</u></b>		
9-1-301	<u>Limitations on Ground Level Concentrations</u>	Y	
9-1-302	<u>General Emission Limitations (applies to A-11 Flare only)</u>	Y	<u>upon start-up of A-11</u>
<b><u>BAAQMD Regulation 9, Rule 2</u></b>	<b><u>Inorganic Gaseous Pollutants – Hydrogen Sulfide (10/6/99)</u></b>		
9-2-301	<u>Limitations on Hydrogen Sulfide</u>	N	
<b><u>40 CFR Part 60, Subpart A</u></b>	<b><u>Standards of Performance for New Stationary Sources – General Provisions (8/27/01)</u></b>		
60.4(b)	<u>Requires Submission of Requests, Reports, Applications, and Other Correspondence to the Administrator</u>	Y	
60.7	<u>Notification and Record Keeping</u>	Y	
60.8	<u>Performance Tests</u>	Y	<u>upon start-up of A-11</u>

Statement of Basis:  
Applications # 2789 and 8514

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**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
60.11	<u>Compliance with Standards and Maintenance Requirements</u>	Y	
60.11(a)	<u>Compliance determined by performance tests</u>	Y	upon start-up of A-11
60.11(d)	<u>Control devices operated using good air pollution control practice</u>	Y	upon start-up of A-11
60.12	<u>Circumvention</u>	Y	
60.13	<u>Monitoring Requirements</u>	Y	
60.13(a)	<u>Applies to all continuous monitoring systems</u>	Y	upon start-up of A-11
60.13(b)	<u>Monitors shall be installed and operational before performing performance tests</u>	Y	upon start-up of A-11
60.13(e)	<u>Continuous monitors shall operate continuously</u>	Y	upon start-up of A-11
60.13(f)	<u>Monitors shall be installed in proper locations</u>	Y	upon start-up of A-11
60.13(g)	<u>Requires multiple monitors for multiple stacks</u>	Y	upon start-up of A-11
60.14	<u>Modification</u>	Y	
60.15	<u>Reconstruction</u>	Y	
60.19	<u>General Notification and Reporting Requirements</u>	Y	
<b>40 CFR Part 60, Subpart Cc</b>	<b><u>Standards of Performance for New Stationary Sources – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (2/24/99)</u></b>		
60.36c(a)	<u>Collection and Control Systems in Compliance by 30 months after Initial NMOC Emission Rate Report Shows NMOC Emissions &gt; 50 MG/year</u>	Y	
<b>40 CFR Part 62</b>	<b><u>Approval and Promulgation of State Plans for Designated Facilities and Pollutants (6/9/03)</u></b>		
62.1100	<u>Identification of Plan</u>	Y	
62.1115	<u>Identification of Sources</u>	Y	
<b>40 CFR Part 63, Subpart A</b>	<b><u>National Emission Standards for Hazardous Air Pollutants: General Provisions (4/22/04)</u></b>		
63.4	<u>Prohibited activities and circumvention</u>	Y	
63.5(b)	<u>Requirements for existing, newly constructed, and reconstructed sources</u>	Y	
63.6(e)	<u>Operation and maintenance requirements and SSM Plan</u>	Y	upon start-up of A-11



Statement of Basis:  
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**Table IV – G**  
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**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION**  
**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
63.6(f)	<u>Compliance with non-opacity emission standards</u>	Y	upon start-up of A-11
63.10(b)(2) (i-v)	<u>Records for startup, shutdown, malfunction, and maintenance</u>	Y	upon start-up of A-11
63.10(d)(5)	<u>Startup, Shutdown, and Malfunction (SSM) Reports</u>	Y	upon start-up of A-11
<b><u>40 CFR Part 63, Subpart AAAA</u></b>	<b><u>National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills (1/16/03)</u></b>		
63.1945	<u>When do I have to comply with this subpart?</u>	Y	
63.1945(b)	<u>Compliance date for existing affected landfills</u>	Y	
63.1955	<u>What requirements must I meet?</u>	Y	
63.1955(a)(2)	<u>Comply with State Plan that implements 40 CFR Part 60, Subpart Cc</u>	Y	
63.1955(b)	<u>Comply with 63.1960-63.1985, if a collection and control system is required by 40 CFR Part 60, Subpart WWW or a State Plan implementing 40 CFR Part 60, Subpart Cc</u>	Y	upon start-up of A-11
63.1955(c)	<u>Comply with all approved alternatives to standards for collection and control systems plus all SSM requirements and 6 month compliance reporting requirements</u>	Y	upon start-up of A-11
63.1960	<u>How is compliance determined?</u>	Y	
63.1965	<u>What is a deviation?</u>	Y	
63.1975	<u>How do I calculate the 3-hour block average used to demonstrate compliance?</u>	Y	upon start-up of A-11
63.1980	<u>What records and reports must I keep and submit?</u>	Y	
63.1980(a)	<u>Comply with all record keeping and reporting requirements in 40 CFR Part 60, Subpart WWW or the State Plan implementing 40 CFR Part 60, Subpart Cc, except that the annual report required by 40 CFR 60.757(f) must be submitted every 6 months</u>	Y	upon start-up of A-11
63.1980(b)	<u>Comply with all record keeping and reporting requirements in 40 CFR Part 60, Subpart A and 40 CFR Part 63, Subpart A, including SSM Plans and Reports</u>	Y	upon start-up of A-11
<b><u>BAAQMD Condition # 20754</u></b>			
<u>Part 1</u>	<u>Waste acceptance limits (Regulation 2-1-301)</u>	Y	

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**Table IV – G**  
**Source-Specific Applicable Requirements**  
**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
<u>Part 2</u>	<u>Landfill gas collection system description (Regulations 2-1-301 and 8-34-301.1)</u>	<u>Y</u>	
<u>Part 3</u>	<u>Control requirements for collected landfill gas (Regulations 2-1-301 and 8-34-301)</u>	<u>Y</u>	<u>upon start-up of A-11</u>
<u>Part 4</u>	<u>Flare temperature limit (Toxic Risk Management Policy and Regulation 8-34-301.3)</u>	<u>Y</u>	<u>upon start-up of A-11</u>
<u>Part 5</u>	<u>NOx emission limit for flare (RACT and Cumulative Increase)</u>	<u>Y</u>	<u>upon start-up of A-11</u>
<u>Part 6</u>	<u>CO emission limit for flare (RACT and Cumulative Increase)</u>	<u>Y</u>	<u>upon start-up of A-11</u>
<u>Part 7</u>	<u>Landfill gas sulfur content limit (RACT and Cumulative Increase)</u>	<u>Y</u>	<u>upon start-up of A-11</u>
<u>Part 8</u>	<u>Annual source test (Regulations 8-34-301.3 and 8-34-412, RACT, and Cumulative Increase)</u>	<u>Y</u>	<u>upon start-up of A-11</u>
<u>Part 9</u>	<u>Annual landfill gas characterization test (Toxic Risk Management Policy, AB-2588 Air Toxics Hot Spots Act, and Regulations 8-34-412 and 9-1-302)</u>	<u>Y</u>	<u>upon start-up of A-11</u>
<u>Part 10</u>	<u>Landfill gas toxic compound concentration limits (Toxic Risk Management Policy and AB-2588 Air Toxics Hot Spots Act)</u>	<u>N</u>	<u>upon start-up of A-11</u>
<u>Part 11</u>	<u>Record keeping requirements (Regulations 2-1-301, 2-6-501, and 8-34-501)</u>	<u>Y</u>	
<u>Part 12</u>	<u>Reporting periods and report submittal due dates for the Regulation 8, Rule 34 report (Regulation 8-34-411 and 40 CFR 63.1980(a))</u>	<u>Y</u>	

1 This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

## V. Schedule of Compliance

No changes to this section are proposed.

## VI. Permit Conditions

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and as appropriate, revised the conditions for clarity and

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enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits. Where necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting has been added to the permit.

For this minor revision, the District is proposing revise Condition # 17821, Part 6 by deleting subpart b, which refers to Application # 2789. As discussed in the Engineering Evaluation for Application # 2789, the District decided to issue a separate source number for the HWMF disposal area, because this area will have a gas collection and control system that is isolated from the main landfill and that requires separate operating and control requirements and separate permit conditions from the main landfill. The District is proposing to add Condition # 20754 for S-46.

All changes to the permit conditions are clearly shown below in strikeout/underline format.

**Condition # 17821**

**FOR: S-15, ACTIVE LANDFILL WITH LANDFILL GAS COLLECTION SYSTEM; AND  
A-8, LANDFILL GAS FLARE**

*(no changes to Parts 1-5)*

6. The Permit Holder shall apply for and receive an Authority to Construct before modifying the landfill gas collection system described in Parts 6a-~~b~~ below. Increasing or decreasing the number of wells or collectors, or significantly changing the length of collectors, or the locations of wells or collectors are all considered to be modifications that are subject to the Authority to Construct requirement.

- a. The Permit Holder has been issued a Permit to Operate for the landfill gas collection system components listed below. Well and collector locations, depths, and lengths are as described in detail in Permit Application # 2417.

Required Components

Total Number of Vertical Wells: 53

Total Number of Horizontal Collectors: 16

- ~~b. The Permit Holder has submitted Application # 2789 for a new separate gas collection and control system for the HWMF section of the landfill. This application is under review.~~

(basis: Regulations 2-1-301, 8-34-301.1, 8-34-304, 8-34-305)

*(no changes to Parts 7-15)*

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**Condition # 20754**

**FOR: S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH GAS COLLECTION SYSTEM AND A-11 LANDFILL GAS FLARE FOR HWMF**

1. The S-46 Hazardous Waste Management Facility (HWMF) is inactive. The Permit Holder shall apply for and receive a Change of Permit Conditions before accepting any solid waste for disposal at S-46. The total cumulative amount of all decomposable wastes placed in the HWMF shall not exceed 210,700 tons. (Basis: Regulation 2-1-301)
2. The Permit Holder has been issued an Authority to Construct for 19 horizontal collectors. Specific locations, depths, and lengths of associated piping are as described in detail in Permit Application # 2789. The Permit Holder shall apply for and receive an Authority to Construct before modifying this gas collection system. Increasing or decreasing the number of wells or collectors, or significantly changing the length of collectors, or the locations of wells or collectors are all considered to be modifications that are subject to the Authority to Construct requirement. Upon start-up of the A-11 Landfill Gas Flare, this gas collection system shall be operated continuously. Wells shall not be shut off, disconnected or removed from operation without written authorization from the District, unless the Permit Holder complies with all applicable requirements of Regulation 8, Rule 34, Sections 113, 116, 117, and 118. (Basis: Regulations 2-1-301 and 8-34-301.1)
3. Upon start-up of A-11, all collected landfill gas shall be vented to the properly operating A-11 Landfill Gas Flare. Raw landfill gas shall not be vented to the atmosphere, except for unavoidable landfill gas emissions that occur during collection system installation, maintenance, or repair that is performed in compliance with Regulation 8, Rule 34, Sections 113, 116, 117, or 118 and for inadvertent component or surface leaks that do not exceed the limits specified in 8-34-301.2 or 8-34-303. (Basis: Regulations 2-1-301 and 8-34-301)
4. The combustion zone temperature of the A-11 Landfill Gas Flare shall be maintained at a minimum of 1400 degrees Fahrenheit, averaged over any 3-hour period. If a source test demonstrates compliance with all applicable requirements at a different temperature, the APCO may revise this minimum temperature limit in accordance with the procedures identified in Regulation 2-6-414 or 2-6-415, based on the following criteria. The minimum combustion zone temperature for the flare shall be equal to the average combustion zone temperature determined during the most recent complying source test minus 50 degrees F, provided that the minimum combustion zone temperature is not less than 1400 degrees F. (Basis: Toxic Risk Management Policy and Regulation 8-34-301.3)

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5. Nitrogen Oxide (NO<sub>x</sub>) emissions from A-11 shall not exceed 0.06 pounds of NO<sub>x</sub> (calculated as NO<sub>2</sub>) per million BTU. The Permit Holder may demonstrate compliance with this emission rate limit by having a nitrogen oxide concentration in the flare exhaust of no more than 15 ppmv of NO<sub>x</sub>, corrected to 15% oxygen, dry basis. (Basis: RACT and Cumulative Increase)
6. Carbon Monoxide (CO) emissions from A-11 shall not exceed 0.30 pounds of CO per million BTU. The Permit Holder may demonstrate compliance with this emission rate limit by having a carbon monoxide concentration in the flare exhaust of no more than 122 ppmv of CO, corrected to 15% oxygen, dry basis. (Basis: RACT and Cumulative Increase)
7. The concentration of total reduced sulfur compounds in the landfill gas vented to A-11 shall not exceed 150 ppmv, expressed as H<sub>2</sub>S, dry basis. (Basis: RACT and Cumulative Increase)
8. In order, to demonstrate compliance with Regulation 8, Rule 34, Sections 301.3 and 412 and Parts 5 and 6 above, the Permit Holder shall ensure that a District approved source test is conducted on the A-11 Landfill Gas Flare, within 60 days of initial start-up of A-11 and annually thereafter. As a minimum, the source tests shall determine the following:
  - a. landfill gas flow rate to the flare (dry basis);
  - b. concentrations (dry basis) of carbon dioxide (CO<sub>2</sub>), nitrogen (N<sub>2</sub>), oxygen (O<sub>2</sub>), methane (CH<sub>4</sub>), and total non-methane organic compounds (NMOC) in the landfill gas;
  - c. stack gas flow rate from the flare (dry basis);
  - d. concentrations (dry basis) of NO<sub>x</sub>, CO, NMOC, and O<sub>2</sub> in the flare stack gas;
  - e. NMOC destruction efficiency achieved by the flare; and
  - f. the average combustion temperature in the flare during the test period.The Source Test Section of the District shall be contacted to obtain their approval of the source test procedures at least 14 days in advance of each source test. The Source Test Section shall be notified of the scheduled test date at least 7 days in advance of each source test. The source test report shall be submitted to the Compliance and Enforcement Division within 45 days of the test date. (Basis: Regulations 8-34-301.3 and 8-34-412, RACT, and Cumulative Increase)
9. The Permit Holder shall conduct a characterization of the landfill gas concurrent with the annual source test required by Part 8 above. The landfill gas sample shall be drawn from the HWMF landfill gas header. In addition to the compounds listed in part 8b, the landfill gas shall be analyzed for all the organic compounds and sulfur compounds listed below. All concentrations shall be reported on a dry basis. The test report shall be submitted to the Compliance and Enforcement

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Division within 45 days of the test date. (Basis: Toxic Risk Management Policy, AB-2588 Air Toxics Hot Spots Act, and Regulations 8-34-412 and 9-1-302)

Organic Compounds

acrylonitrile  
benzene  
benzyl chloride  
carbon tetrachloride  
chlorobenzene  
chlorodifluoromethane  
chloroethane  
chloroform  
1,1 dichloroethane  
1,1 dichlorethene  
1,2 dichloroethane  
1,4 dichlorobenzene  
dichlorodifluoromethane  
dichlorofluoromethane  
ethylbenzene  
ethylene dibromide  
fluorotrichloromethane  
hexane  
isopropyl alcohol  
methyl ethyl ketone  
methylene chloride  
perchloroethylene  
toluene  
1,1,1 trichloroethane  
1,1,2,2 tetrachloroethane  
trichloroethylene  
vinyl chloride  
xylenes

Sulfur Compounds

hydrogen sulfide  
carbon disulfide  
carbonyl sulfide  
dimethyl sulfide  
ethyl mercaptan  
methyl mercaptan

\*10. If the concentrations (dry basis) of toxic air contaminants in the collected landfill gas exceed any of the limits listed below, the Permit Holder shall submit a permit

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application for a Change of Permit Conditions within 30 days of receiving the test results.

<u>Acrylonitrile</u>	=	<u>6.3 ppmv</u>
<u>Benzene</u>	=	<u>4.4 ppmv</u>
<u>Vinyl Chloride</u>	=	<u>90.4 ppmv</u>

(Basis: Toxic Risk Management Policy and AB-2588 Air Toxics Hot Spots Act)

11. In order to demonstrate compliance with the above conditions, the Permit Holder shall maintain the following records in a District approved logbook.
- a. record the initial start-up date for each collector in the HWMF collection system.
  - b. record the initial start-up date for the A-11 Landfill Gas Flare.
  - c. record the dates, times, durations, and reasons for each shut-down of (i) an individual collector, (ii) the entire collection system, or (iii) the A-11 Flare.
  - d. maintain records of the test dates and the test results for any tests conducted to demonstrate compliance with these permit conditions.

(Basis: Regulations 2-1-301, 8-34-501, and 2-6-501)

12. The annual report for the S-46 HWMF, which is required by BAAQMD Regulation 8-34-411 and 40 CFR Part 63.1980(a), shall be combined with the annual report for the S-15 Landfill and shall be submitted in accordance with the schedule identified in Condition # 17821, Part 15. (Basis: Regulation 8-34-411 and 40 CFR Part 63.1980(a))

## **VII. Applicable Limits and Compliance Monitoring Requirements**

This section of the permit is a summary of numerical limits and related monitoring requirements that apply to each source. The summary includes a citation for each monitoring requirement, frequency, and type. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The monitoring requirements for S-46 and A-11 are identified below in the new Table VII-G. For this minor revision, the District is not proposing any changes to any existing federally enforceable monitoring requirements. New monitoring requirements for S-46 and A-11 and requirements for which no monitoring is proposed are discussed in detail after the table.

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**Applicable Limits and Compliance Monitoring Requirements**  
**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION**  
**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Type of Limit</u>	<u>Citation of Limit</u>	<u>FE Y/N</u>	<u>Future Effective Date</u>	<u>Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
<u>Collection System Installation Dates</u>	<u>BAAQMD 8-34-304.1</u>	<u>Y</u>		<u>For Inactive/Closed Areas: collection system components must be installed and operating by 2 years + 60 days after initial waste placement</u>	<u>BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 20754, Part 11a</u>	<u>P/E</u>	<u>Records</u>
<u>Collection System Installation Dates</u>	<u>BAAQMD 8-34-304.2</u>	<u>Y</u>		<u>For Active Areas: Collection system components must be installed and operating by 5 years + 60 days after initial waste placement</u>	<u>BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 20754, Part 11a</u>	<u>P/E</u>	<u>Records</u>
<u>Collection System Installation Dates</u>	<u>BAAQMD 8-34-304.3</u>	<u>Y</u>		<u>For Any Uncontrolled Areas or Cells: collection system components must be installed and operating within 60 days after the uncontrolled area or cell accumulates 1,000,000 tons of decomposable waste</u>	<u>BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 20754, Part 11a</u>	<u>P/E</u>	<u>Records</u>
<u>Gas Flow</u>	<u>BAAQMD 8-34-301 and 301.1</u>	<u>Y</u>	<u>Upon Start-Up of A-11</u>	<u>Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system</u>	<u>BAAQMD 8-34-501.10 and 508</u>	<u>C</u>	<u>Gas Flow Meter and Recorder (every 15 minutes)</u>



Statement of Basis:  
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**Table VII – G**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION**  
**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Type of Limit</u>	<u>Citation of Limit</u>	<u>FE Y/N</u>	<u>Future Effective Date</u>	<u>Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
Gas Flow	BAAQMD Condition # 20754, Parts 2 and 3	Y	Upon Start-Up of A-11	Landfill gas collection system shall operate continuously and all collected gases shall be vented to a properly operating control system	BAAQMD Condition # 20754, Part 11a-c	P/D	Records of Landfill Gas Flow Rates, Collection and Control Systems Downtime, and Collection System Components
Collection and Control Systems Shutdown Time	BAAQMD 8-34-113.2	Y	Upon Start-Up of A-11	240 hours/year nor 5 consecutive days	BAAQMD 8-34-501.1	P/D	Operating Records
Startup Shutdown or Mal-function Procedures	40 CFR 63.6(e)	Y	Upon Start-Up of A-11	Minimize Emissions by Implementing SSM Plan	40 CFR 63.1980(a-b)	P/E	Records (all occurrences, duration of each, corrective actions)
Periods of Inoperation for Parametric Monitors	BAAQMD 1-523.2	Y	Upon Start-Up of A-11	15 consecutive days/incident and 30 calendar days/12 month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors
Continuous Monitors	40 CFR 60.13(e)	Y	Upon Start-Up of A-11	Requires Continuous Operation except for breakdowns, repairs, calibration, and required span adjustments	40 CFR 60.7(b)	P/D	Operating Records for All Continuous Monitors

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**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Type of Limit</u>	<u>Citation of Limit</u>	<u>FE Y/N</u>	<u>Future Effective Date</u>	<u>Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
<u>Wellhead Pressure</u>	<u>BAAQMD 8-34-305.1</u>	<u>Y</u>	<u>Upon Start-Up of A-11</u>	<u>&lt; 0 psig</u>	<u>BAAQMD 8-34-414, 501.9 and 505.1</u>	<u>P/M</u>	<u>Monthly Inspection and Records</u>
<u>Temperature of Gas at Wellhead</u>	<u>BAAQMD 8-34-305.2</u>	<u>Y</u>	<u>Upon Start-Up of A-11</u>	<u>&lt; 55 °C</u>	<u>BAAQMD 8-34-414, 501.9 and 505.2</u>	<u>P/M</u>	<u>Monthly Inspection and Records</u>
<u>Gas Concentrations at Wellhead</u>	<u>BAAQMD 8-34-305.3 or 305.4</u>	<u>Y</u>	<u>Upon Start-Up of A-11</u>	<u>N<sub>2</sub> &lt; 20% OR O<sub>2</sub> &lt; 5%</u>	<u>BAAQMD 8-34-414, 501.9 and 505.3 or 505.4</u>	<u>P/M</u>	<u>Monthly Inspection and Records</u>
<u>Well Shutdown Limits</u>	<u>BAAQMD 8-34-117.4</u>	<u>Y</u>	<u>Upon Start-Up of A-11</u>	<u>No more than 5 wells at a time or 10% of total collection system, whichever is less</u>	<u>BAAQMD 8-34-117.6 and 501.1</u>	<u>P/D</u>	<u>Records</u>
<u>Well Shutdown Limits</u>	<u>BAAQMD 8-34-117.5</u>	<u>Y</u>	<u>Upon Start-Up of A-11</u>	<u>24 hours per well</u>	<u>BAAQMD 8-34-117.6 and 501.1</u>	<u>P/D</u>	<u>Records</u>
<u>TOC (Total Organic Compounds Plus Methane)</u>	<u>BAAQMD 8-34-301.2</u>	<u>Y</u>	<u>Upon Installation of Collection Systems and A-11</u>	<u>1000 ppmv as methane (component leak limit)</u>	<u>BAAQMD 8-34-501.6 and 503</u>	<u>P/Q</u>	<u>Quarterly Inspection of collection and control system components with OVA and Records</u>

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**S-46 HAZARDOUS WASTE MANAGEMENT FACILITY WITH LANDFILL GAS COLLECTION**  
**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Type of Limit</u>	<u>Citation of Limit</u>	<u>FE Y/N</u>	<u>Future Effective Date</u>	<u>Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
TOC	BAAQMD 8-34-303	Y		500 ppmv as methane at 2 inches above surface	BAAQMD 8-34-415, 416, 501.6, 506 and 510	P/M, Q, and E	Monthly Visual Inspection of Cover, Quarterly Inspection with OVA of Surface, Various Reinspec- tion Times for Leaking Areas, and Records
Non- Methane Organic Com- pounds (NMOC)	BAAQMD 8-34-301.3	Y	Upon Start-Up of A-11	98% removal by weight OR < 30 ppmv, dry basis @ 3% O <sub>2</sub> , expressed as methane (applies to A-11 Flare)	BAAQMD 8-34-412 and 8-34-501.4 and BAAQMD Condition # 20754, Part 8	P/A	Initial and Annual Source Tests and Records
Temper- ature of Combus- tion Zone (CT)	BAAQMD Condition # 20754, Part 4	Y	Upon Start-Up of A-11	CT > 1400 °F, averaged over any 3-hour period (applies to A-11 Flare)	BAAQMD 8-34-501.3 and 507, and BAAQMD Condition# 20754, Part 8f	C	Temperature Sensor and Recorder (continuous)
Opacity	BAAQMD 6-301	Y	Upon Start-Up of A-11	Ringelmann No. 1 for < 3 minutes/hour (applies to A-11 Flare)	None	N	NA

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**SYSTEM; AND A-11 LANDFILL GAS FLARE FOR HWMF**

<u>Type of Limit</u>	<u>Citation of Limit</u>	<u>FE Y/N</u>	<u>Future Effective Date</u>	<u>Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
FP	BAAQMD 6-310	Y	Upon Start-Up of A-11	< 0.15 grains/dscf (applies to A-11 Flare only)	None	N	NA
SO <sub>2</sub>	BAAQMD 9-1-301	Y	Upon Start-Up of A-11	Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours	None	N	NA
SO <sub>2</sub>	BAAQMD Regulation 9-1-302	Y	Upon Start-Up of A-11	< 300 ppm (dry basis) (applies to A-11 Flare only)	BAAQMD Condition # 20754, Part 9	P/A	Sulfur analysis of landfill gas
Total Sulfur Content in Landfill Gas	BAAQMD Condition # 20754, Part 7	Y	Upon Start-Up of A-11	< 150 ppmv of TRS, expressed as H <sub>2</sub> S, dry basis	BAAQMD Condition # 20754, Part 9	P/A	Sulfur analysis of landfill gas
H <sub>2</sub> S	BAAQMD 9-2-301	N		Property Line Ground Level Limits: ≤ 0.06 ppm, averaged over 3 minutes and < 0.03 ppm, averaged over 60 minutes	None	N	NA
Amount of Waste Accepted	BAAQMD Condition # 20754, Part 1	Y		< 210,700 tons (cumulative amount of all decomposable wastes)	BAAQMD 8-34-501.7 and 501.8	P/E	Records

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<u>Type of Limit</u>	<u>Citation of Limit</u>	<u>FE Y/N</u>	<u>Future Effective Date</u>	<u>Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
<u>NO<sub>x</sub></u>	<u>BAAQMD Condition # 20754, Part 5</u>	<u>Y</u>	<u>Upon Start-Up of A-11</u>	<u>A-11 Flare Outlet Concentration Limit: &lt; 15 ppmv of NO<sub>x</sub>, at 15% O<sub>2</sub>, dry basis. Unless A-11 Flare Emissions Are: &lt; 0.06 pounds/MM BTU, calculated as NO<sub>2</sub></u>	<u>BAAQMD Condition # 20754, Part 8</u>	<u>P/A</u>	<u>Initial and Annual Source Tests</u>
<u>CO</u>	<u>BAAQMD Condition # 20754, Part 6</u>	<u>Y</u>	<u>Upon Start-Up of A-11</u>	<u>A-11 Flare Outlet Concentration Limit: &lt; 122 ppmv of CO, at 15% O<sub>2</sub>, dry basis. Unless A-11 Flare Emissions Are: &lt; 0.30 pounds/MM BTU</u>	<u>BAAQMD Condition # 20754, Part 8</u>	<u>P/A</u>	<u>Initial and Annual Source Tests</u>
<u>Toxic Air Contaminants</u>	<u>BAAQMD Condition # 20754, Part 10</u>	<u>N</u>	<u>Upon Start-Up of A-11</u>	<u>Landfill Gas Concentration Limits: Acrylonitrile 6.3 ppmv Benzene 4.4 ppmv Vinyl Chloride 90.4 ppmv</u>	<u>BAAQMD Condition # 20754, Part 9</u>	<u>P/A</u>	<u>Annual Landfill Gas Analysis</u>

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) the degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. When a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still

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be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other limits and has determined that monitoring is adequate to provide a reasonable assurance of compliance. Calculations for potential to emit will be provided when no monitoring is proposed due to the size of a source.

NO<sub>x</sub> and CO Sources

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
A-11 Landfill Gas Flare for HWMF	BAAQMD Condition # 20754, Part 5	Outlet Concentration Limit: ≤ 15 ppmv of NO <sub>x</sub> , at 15% O <sub>2</sub> , dry basis, Unless Flare Emissions Are: ≤ 0.06 pounds/MM BTU, calculated as NO <sub>2</sub>	Initial and Annual Source Tests
A-11 Landfill Gas Flare for HWMF	BAAQMD Condition # 20754, Part 6	Outlet Concentration Limit: ≤ 122 ppmv of CO, at 15% O <sub>2</sub> , dry basis, Unless Flare Emissions Are: ≤ 0.30 pounds/MM BTU	Initial and Annual Source Tests

NO<sub>x</sub> and CO Discussion:

The District has imposed an annual source test requirement for NO<sub>x</sub> and CO limits at landfill gas fired combustion equipment in other Title V permits. Annual source testing is a standard monitoring method for engines that are used for control of landfill gas. The new flare controls comparable quantities of landfill gas and has much lower emissions. Therefore, annual source testing is adequate for demonstrating compliance with the proposed NO<sub>x</sub> and CO limits.

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SO<sub>2</sub> Sources

<b># &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
A-11 Landfill Gas Flare for HWMF	BAAQMD 9-1-301	Property Line Ground Level SO <sub>2</sub> Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours	None
A-11 Landfill Gas Flare for HWMF	BAAQMD 9-1-302	Gas Stream SO <sub>2</sub> Limit: ≤ 300 ppm (dry)	Annual Sulfur Analysis of Landfill Gas
S-46 HWMF	BAAQMD Condition # 20754, Part 7	≤ 150 ppmv of TRS, expressed as H <sub>2</sub> S, dry basis	Annual Sulfur Analysis of Landfill Gas

SO<sub>2</sub> Discussion:

Maximum potential sulfur dioxide (SO<sub>2</sub>) emissions are calculated below for A-11 followed by a discussion of each applicable limit related to sulfur dioxide emissions.

Potential to Emit Calculations for the A-11 Landfill Gas Flare for HWMF:

As discussed in Application # 8514, maximum potential SO<sub>2</sub> emissions are based on the maximum permitted total reduced sulfur compound concentration of 150 ppmv as H<sub>2</sub>S from BAAQMD Condition # 20754, Part 7 and the maximum possible landfill gas usage rate of 91,980,000 scf/year.

$$(91,980,000 \text{ ft}^3 \text{ LFG/year}) * (150 \text{ ft}^3 \text{ H}_2\text{S}/10^6 \text{ ft}^3 \text{ LFG}) / (387 \text{ ft}^3 \text{ H}_2\text{S}/\text{lbmol H}_2\text{S}) * (1 \text{ lbmol SO}_2/1 \text{ lbmol H}_2\text{S}) * (64.06 \text{ pounds SO}_2/\text{lbmol SO}_2) / (2000 \text{ pounds SO}_2/\text{ton SO}_2) = 1.14 \text{ tons SO}_2/\text{year}$$

BAAQMD Regulation 9-1-301: As discussed below for BAAQMD Regulations 9-1-302, this facility will be subject to federally enforceable limits, which will ensure compliance with the Regulation 9-1-302 gas stream emission limit of 300 ppmv of SO<sub>2</sub> in the exhaust from the new flare. Based on modeling analyses conducted at another landfill site, sources complying with the Regulation 9-1-302 limits are not expected to result in an excess of the ground level concentration limits listed in Regulation 9-1-301. Monitoring for ground level SO<sub>2</sub> concentrations in addition to the proposed landfill gas monitoring would not be appropriate.

BAAQMD Regulation 9-1-302: This facility will be subject to a federally enforceable limit of 150 ppmv of TRS in the landfill gas (BAAQMD Condition # 20754, Part 7). The landfill gas is assumed to contain a minimum of 40% methane, and the exhaust gas is assumed to have a minimum of 10% oxygen. As shown by the calculation below, the maximum SO<sub>2</sub> exhaust

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concentration that will result from this limit is far below the BAAQMD Regulation 9-1-302 limit of 300 ppmv of SO<sub>2</sub> in the exhaust.

$$(150 \text{ ft}^3 \text{ H}_2\text{S} / 10^6 \text{ ft}^3 \text{ LFG}) * (1 \text{ ft}^3 \text{ SO}_2 / 1 \text{ ft}^3 \text{ H}_2\text{S}) / (4.0186 \text{ ft}^3 \text{ dry flue gas at 0\% O}_2 / \text{ft}^3 \text{ LFG}) \\ = 3.73\text{E-}5 \text{ ft}^3 \text{ SO}_2 / \text{ft}^3 \text{ dry flue gas at 0\% O}_2 = 37.3 \text{ ppmv of SO}_2 \text{ at 0\% O}_2, \text{ dry basis} \\ (37.3 \text{ ppmv of SO}_2 \text{ at 0\% O}_2) * (20.9-10) / (20.9-0) = 19.5 \text{ ppmv of SO}_2 \text{ at 10\% O}_2, \text{ dry basis}$$

Staff has proposed permit conditions (BAAQMD Condition # 20754, Part 9) that will require the landfill gas to be analyzed annually for total reduced sulfur compounds. The margin of compliance with this limit is (300/19.5) more than 15 to 1. Since the margin of compliance is high and sulfur dioxide emissions are low (1.14 tons/year), annual monitoring of the landfill gas is appropriate for demonstrating compliance with this limit.

BAAQMD Condition # 20754, Part 7: Staff has proposed permit conditions that require annual testing for the concentration of total reduced sulfur compounds in the landfill gas (BAAQMD Condition # 20754, Part 9). Recent testing at the main landfill for this site found 70 ppmv of TRS in the landfill gas. Based on the type of wastes generating landfill gas at the HWMF, the TRS concentration in gas from the HWMF is expected to be no higher than the TRS concentration at the main landfill and is not expected to vary appreciable. The margin of compliance with this limit is (150/70) about 2 to 1. Since the margin of compliance is sufficient and sulfur dioxide emissions are low, annual monitoring of the landfill gas for TRS is expected to be adequate for demonstrating compliance with the TRS concentration limit.

#### PM Sources

<b># &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
A-11 Landfill Gas Flare for HWMF	BAAQMD 6-301	Ringelmann 1.0	None
A-11 Landfill Gas Flare for HWMF	BAAQMD 6-310	0.15 gr/dscf	None

#### PM Discussion:

Maximum potential PM<sub>10</sub> emissions are described below for sources listed above that have a PM limit and no proposed monitoring for that limit.

Potential to Emit for A-11 Landfill Gas Flare for HWMF:

As discussed in Application # 8514, maximum potential PM<sub>10</sub> emissions from A-11 are based on the AP-42 emission factor for flares of 17 pounds PM<sub>10</sub> per MM scf of methane and the maximum heat input rate to the flare of 5.25 MM BTU/hour.



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$$(5.25 \text{ E6 BTU/hour}) * (24 \text{ hours/day}) * (365 \text{ days/year}) / (1000 \text{ BTU/ft}^3 \text{ CH}_4) * (17 \text{ lbs PM}_{10} / 1 \text{ E6 ft}^3 \text{ CH}_4) / (2000 \text{ lbs PM}_{10} / \text{ton PM}_{10}) = 0.39 \text{ tons/year of PM}_{10}$$

BAAQMD Regulation 6-301: Visible particulate emissions are normally not associated with combustion of gaseous fuels, such as natural gas or landfill gas. Particulate emissions from A-11 are very low (0.39 tons/year). Since violations of Ringelmann 1.0 limit are not expected and particulate emissions are very low, periodic monitoring for the Ringelmann limit would not be appropriate for this flare.

BAAQMD Regulation 6-310: Regulation 6-310 limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. The maximum grain-loading rate for A-11 is calculated below for landfill gas containing a maximum of 55% methane.

$$(17 \text{ lbs PM}_{10} / 1 \text{ E6 ft}^3 \text{ CH}_4) * (7000 \text{ grains PM}_{10} / \text{lb PM}_{10}) * (0.55 \text{ ft}^3 \text{ CH}_4 / 1 \text{ ft}^3 \text{ LFG}) / (5.1506 \text{ ft}^3 \text{ dry flue gas at 0\% O}_2 / 1 \text{ ft}^3 \text{ LFG}) = 0.013 \text{ grains PM}_{10} / \text{ft}^3 \text{ dry flue gas at 0\% O}_2$$

The compliance ratio with the Regulation 6-310 limit is  $(0.15/0.013) = 11.5$  to 1. Since the Regulation 6-310 grain-loading limit is far above any expected PM emissions, and the PM emissions from A-11 are very low, it would not be appropriate to add periodic monitoring for this standard.

### H<sub>2</sub>S Sources

S# & Description	Emission Limit Citation	Emission Limit (Not Federally Enforceable)	Monitoring
S-46 HWMF	BAAQMD 9-2-301	Property line ground level limits: ≤ 0.06 ppm Averaged over 3 minutes and ≤ 0.03 ppm Averaged over 60 minutes	None
A-11 Landfill Gas Flare for HWMF	BAAQMD 9-2-301	Property line ground level limits: ≤ 0.06 ppm Averaged over 3 minutes and ≤ 0.03 ppm Averaged over 60 minutes	None

#### Hydrogen Sulfide (H<sub>2</sub>S) Discussion:

BAAQMD Regulation 9-2-301: Hydrogen sulfide can be detected by its odor at concentrations as low as 0.0005 ppmv and is generally identified by its characteristic rotten egg smell at a concentration of 0.005 ppmv or less. Therefore, H<sub>2</sub>S emissions are typically discovered by smell

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well before the concentration approaches the lowest Regulation 9-2-301 emission limit of 0.03 ppmv. The District rarely receives complaints about hydrogen sulfide odors from Bay Area landfills. During the last year, the District received only one complaint against this facility, and this complaint could not be confirmed by the District’s inspection staff. Furthermore, the alleged complaint did not describe the smell as a rotten egg odor that is characteristic of H<sub>2</sub>S emissions. Since H<sub>2</sub>S odors have not been detected at this facility, the concentration of H<sub>2</sub>S at the property line is expected to be well below the Regulation 9-2-301 limits. Furthermore, the maximum expected H<sub>2</sub>S emissions are not expected to be significant and the BAAQMD Regulation 9-2-301 emission limits are not federally enforceable. Monitoring for ground level H<sub>2</sub>S concentrations would not be appropriate when no H<sub>2</sub>S odor problem exists.

**Other Limits**

<b>S# &amp; Description</b>	<b>Limit Citation</b>	<b>Non-Federally Enforceable Limit</b>	<b>Monitoring</b>
S-46 HWMF	BAAQMD Condition # 20754, Part 10	<u>Landfill Gas</u> <u>Concentration Limits:</u> <u>Acrylonitrile 6.3 ppmv</u> <u>Benzene 4.4 ppmv</u> <u>Vinyl Chloride 90.4 ppmv</u>	Annual Landfill Gas Characterization Analysis

Other Limits Discussion:

BAAQMD Condition # 20754, Part 10: These TAC concentration limits were used in conjunction with destruction efficiency assumptions to calculate annual TAC emissions. These annual TAC emission estimates were necessary for a risk screening analysis that was required pursuant to the District’s Risk Management Policy. Therefore, these TAC concentration limits are not federally enforceable. An exceedence of one of these limits requires the Permit Holder to submit a permit application so that staff can conduct a new risk screening analysis, if required. Analysis of the landfill gas is a standard method of demonstrating compliance with TAC concentration limits in landfill gas. Since the TAC concentration limits reflect annual emission limits, an annual analysis of the landfill gas is adequate.

**VIII. Test Methods**

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

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The District is proposing to add the test method references for S-46 and A-11 that are listed below to Table VIII.

**Table VIII  
Test Methods**

<b>Applicable Requirement</b>	<b>Description of Requirement</b>	<b>Acceptable Test Methods</b>
...		
<u>BAAQMD Condition # 20754, Part 4</u>	<u>Flare Combustion Temperature Limit</u>	<u>APCO Approved Device</u>
<u>BAAQMD Condition # 20754, Part 5</u>	<u>Flare NO<sub>x</sub> Emissions Limit</u>	<u>Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling and ST-14, Oxygen, Continuous Sampling</u>
<u>BAAQMD Condition # 20754, Part 6</u>	<u>Flare CO Emissions Limit</u>	<u>Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling</u>
<u>BAAQMD Condition # 20754, Part 7</u>	<u>Landfill Gas Sulfur Content Limit</u>	<u>Manual of Procedures, Volume III, Method 44 Determination of Reduced Sulfur Gases and Sulfur Dioxide in Effluent Samples by Gas Chromatographic Methods, or ASTM D 1072-80 or 90, D 3031-81, D 4084-82 or 94, or D 3246-81, 92, or 96</u>
<u>BAAQMD Condition # 20754, Part 8</u>	<u>Flare Source Test</u>	<u>Outlet: Manual of Procedures, Volume IV, ST-17, Stack Gas Velocity and Volumetric Flow Rate; ST-23 Water Vapor; ST-14, Oxygen, Continuous Sampling; ST-13A, Oxides of Nitrogen, Continuous Sampling; ST-6, Carbon Monoxide, Continuous Sampling; Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide, Continuous Sampling; and Manual of Procedures, Volume IV, ST-7, Organic Compounds or EPA Reference Methods 18, 25, 25A, or 25C; Inlet: EPA Reference Method 3C</u>
<u>BAAQMD Condition # 20754, Part 9</u>	<u>Landfill Gas Characterization Test</u>	<u>EPA Reference Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography; and Manual of Procedures, Volume III, Method 44 Determination of Reduced Sulfur Gases and Sulfur Dioxide in Effluent Samples by Gas Chromatographic Methods, or ASTM D 1072-80 or 90, D 3031-81, D 4084-82 or 94, or D 3246-81, 92, or 96</u>
<u>BAAQMD Condition # 20754, Part 10</u>	<u>Toxic Compound Concentration Limits (in landfill gas)</u>	<u>APCO approved sampling procedures described in BAAQMD Condition # 20754, Part 9 and GC Analysis for all compounds listed in Part 10</u>

Minor Revision to Include the Inactive Hazardous Waste Management Facility (S-46) and Flare (A-11) and Miscellaneous Administrative Corrections

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## IX. Permit Shield

This facility has no permit shields, and no changes to this section are proposed.

## X. Revision History

This section summarizes the revisions that have been made to the permit since it was initially issued. The changes associated with this proposed minor revision will be summarized in Section X as indicated below.

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<b>Minor Revision (Applications # 2789 and # 8514):</b>	<b>[Insert Date]</b>
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- Correct the District contact person on the Title Page.
- Update regulatory amendment dates in Section I.A.
- Clarify standard conditions by adding Section I.B.12 and by revising Section I.G.
- Correct the bases for Sections I.B.11, I.E.2, and I.F.
- Add S-46 to Table II-A.
- Add A-11 and correct a limit for A-8 in Table II-B.
- Correct a typographical error and add web site address to Section III.
- Correct errors, update regulatory amendment dates, and include new non-federally enforceable generally applicable requirements in Table III.
- Correct a typographical error and add web site address to Section IV.
- Update regulatory amendment dates in Tables IV-A, IV-B, IV-E, and IV-F.
- Add Table IV-G for S-46 and A-11.
- Delete subpart b of Condition # 17821, Part 6, because the subpart is no longer necessary.
- Add Condition # 20754 for S-46 and A-11.
- Add Table VII-G for S-46 and A-11.
- Add all applicable test methods for S-46 and A-11 to Table VIII.
- Update the revision history in Section X.
- Add several terms to the glossary in Section XI.
- Correct the web site address listed in Section XII.

Statement of Basis:  
Applications # 2789 and 8514

Site A1840, West Contra Costa Sanitary Landfill, Inc.  
Foot of Parr Boulevard, Richmond, CA 94901

Minor Revision to Include the Inactive Hazardous Waste Management Facility (S-46) and Flare (A-11) and Miscellaneous Administrative Corrections

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## **XI. Glossary**

This section explains words, phrases, acronyms, symbols, and usage unit abbreviations that are used in this permit. The following terms will be added to the Glossary:

### **ATCM**

Airborne Toxic Control Measure

### **HWMF**

Hazardous Waste Management Facility

## **XII. Applicable State Implementation Plan**

This section provides the web site address for the SIP versions of BAAQMD rules and regulations. The web site address has changed and will be corrected as indicated below.

The Bay Area Air Quality Management District's portion of the State Implementation Plan can be found at EPA Region 9's website. The address is:

<http://yosemite1.epa.gov/r9/r9sips.nsf/California?ReadForm&Start=1&Count=30&Expand=3.1>  
<http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions>

### **D. Alternate Operating Scenarios:**

No alternate operating scenarios have been requested for this facility. No changes are proposed for this section pursuant to this minor MFR permit revision.

### **E. Compliance Status:**

There is no change in compliance status for this facility.

### **F. Differences between the Application and the Proposed Permit:**

The application materials for the minor MFR revision are contained in Application # 8514. The applicant applied to add an abatement device (the A-11 flare). For this proposed minor revision, the District included A-11, the source that this abatement device is controlling (S-46 HWMF), and the gas collection system for S-46. The District proposed a correction to Condition # 17821, Part 6, which the applicant did not address. The applicant did not discuss applicable requirements for A-11, while the District's proposed permit includes all a list of applicable

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requirements for S-46 and A-11, a summary of all emission limits and compliance monitoring requirements, and test method references for the new requirements. The District is also proposing several administrative corrections to this permit, which were not discussed by the application materials.

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