

December 1, 2003

James Devlin  
**Waste Management of Alameda County**  
10840 Altamont Pass Road  
Livermore, CA 94550

**ALAMEDA COUNTY**

Roberta Cooper  
Scott Haggerty  
(Chairperson)  
Nate Miley  
Shelia Young

Application Number: 25828  
Plant Name: Altamont Landfill and Resource Recovery Facility  
Plant Number: A2066  
Equipment Location: 10840 Altamont Pass Road  
Livermore, CA 94550

**CONTRA COSTA COUNTY**

Mark DeSaulnier  
Mark Ross  
Gayle Uilkema  
(Secretary)

Dear Mr. Devlin:

The District has reviewed your November 7, 2003 comments on the October 1, 2003 draft of the Major Facility Review (MFR) Permit for Waste Management of Alameda County's Altamont Landfill and Resource Recovery Facility (Facility # A2066). The District's responses to your comments are provided below. The District's responses generally follow the same order as your comments, except that all District responses related to the same issue have been grouped together. The attached documents show the changes that have been made to the draft MFR Permit in response to your comments and District staff comments.

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO COUNTY**

Willie Brown, Jr.  
Chris Daly  
Jake McGoldrick

**1. Title Page**  
(Page 1 of 11/7/03 Comment Letter)

**SAN MATEO COUNTY**

Jerry Hill  
Marland Townsend  
(Vice-Chairperson)

The District has changed the Responsible Official and Facility Contact information as you requested.

**2. S-2 Altamont Landfill: Design Capacity Limit**  
(Pages 2, 13, and 17 of 11/7/03 Comment Letter)

**SANTA CLARA COUNTY**

Liz Kniss  
Patrick Kwok  
Julia Miller  
Dena Mossar

You requested that the District change the maximum permitted design capacity of the landfill from 58.9 million cubic yards of air space (refuse and cover materials, excluding final cover) to 58.9 million cubic yards of refuse only.

**SOLANO COUNTY**

John F. Silva

**SONOMA COUNTY**

Tim Smith  
Pamela Torliatt

The District's proposed design capacity limit is intended to have the same meaning as design capacity and solid waste as defined in 40 CFR 60.751. This limit is necessary to establish the baseline maximum permitted design capacity for this site. Any increases of this baseline maximum permitted design capacity (by either horizontal or vertical expansion) that occur after May 30, 1991 will be considered a modification as defined and 40 CFR 60.751, which triggers the requirement to comply with the New Source Performance Standards (NSPS) for MSW Landfills in 40 CFR Part 60, Subpart WWW. Such a modification would also trigger the District's New Source Review (NSR) requirements in Regulation 2, Rule 2.

Jack Broadbent  
**EXECUTIVE  
OFFICER/APCO**

**From 40 CFR 60.751:**

**Design capacity** means the maximum amount of solid waste a landfill can accept, as indicated in terms of volume or mass in the most recent permit issued by the State, local, or Tribal agency responsible for regulating the landfill, plus any in-place waste not accounted for in the most recent permit. If the owner or operator chooses to convert the design capacity from volume to mass or from mass to volume to demonstrate its design capacity is less than 2.5 million megagrams or 2.5 million cubic meters, the calculation must include a site specific density, which must be recalculated annually.

**Solid waste** means any garbage, sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges that are point sources subject to permits under 33 U.S.C. 1342, or source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954, as amended (42 U.S.C 2011 et seq.).

**Modification** means an increase in the permitted volume design capacity of the landfill by either horizontal or vertical expansion based on its permitted design capacity as of May 30, 1991. Modification does not occur until the owner or operator commences construction on the horizontal or vertical expansion.

As shown in the above definitions, solid waste includes more than what is generally considered to be refuse. Discarded materials such as green waste, shredded tires, petroleum contaminated soils, concrete rubble, or other debris that are re-used as daily cover materials would be considered solid waste, but some of these materials may not be considered refuse. Other types of non-degradable waste (such as asbestos waste) are solid waste, but also may not be generally considered refuse. Therefore, a refuse only limit would not serve the purpose of this permit condition (i.e. a refuse only limit would not represent the correct baseline for determining if an increase to this limit would be an NSPS triggering event).

To clarify the meaning of the District's design capacity limit, the District agrees to make the following changes to Condition # 19235, Part 18c. This change is also reflected in Table VII-A, see attachment.

Condition # 19235

18. The Permit Holder shall comply with the following waste acceptance and disposal limits and shall obtain the appropriate New Source Review permit, if one of the following limits is exceeded:
  - a. Total waste accepted and placed at the landfill shall not exceed 11,150 tons in any day. (basis: Regulation 2-1-301)
  - b. The amount of non-hazardous sludge accepted and placed at the landfill shall not exceed 5,000 tons in any day. (basis: Regulation 2-1-301)
  - c. The maximum design capacity of the landfill (total volume of all ~~wastes and cover materials~~ solid waste placed in the landfill, ~~excluding final cover~~ where solid waste has the same meaning as the definition in 40 CFR Part 60.751) shall not exceed 58,900,000 cubic yards. (basis: Regulation 2-1-301)
  - d. The total cumulative amount of all waste placed in the landfill shall not exceed 47,100,000 tons. Exceedance of the cumulative tonnage limit is not a violation of the permit and does not trigger the requirement to obtain a New Source review permit, if the operator can, within 30 days of the date of discovery of the exceedance, provide documentation to the District

demonstrating, in accordance with BAAQMD Regulation 2-1-234.3, that the limit should be higher. (basis: Regulation 2-1-234.3)

Most Solid Waste Facility Permits express the maximum permitted volumetric limits for landfill sites in terms of an air space limit that includes all refuse, daily cover materials, and intermediate cover materials placed in the landfill. Such air space limits would include all solid waste that could be placed in the landfill. Therefore, the District has been treating these air space limits as synonymous to a volumetric solid waste limit unless evidence is available that clearly indicates that the solid waste facility permit's design capacity limit means something other than total volumetric solid waste.

Your July 14, 1994 Solid Waste Facility Permit indicated that the Design Capacity for the Altamont Landfill (01-AA-0009) is 58.9 million cubic yards and 47,100,000 tons. As discussed above, the volumetric limit is assumed to be the total air space and total volumetric solid waste limit. If this assumption is incorrect, please provide documentation demonstrating that the design capacity limit in your solid waste facility permit (that was in effect prior to May 30, 1991) means something other than total volumetric solid waste as defined in 40 CFR Part 60.751. This documentation should include any permits, EIR excerpts, letters, or other statements (from agencies responsible for issuing permits for this site) that affirm the correctness of your claims about the maximum permitted volumetric solid waste design capacity for this site. This documentation should also include verification that the maximum permitted volumetric solid waste design capacity for the site has not been modified (as defined in 40 CFR Part 60.751) since May 30, 1991.

**3. S-2 Altamont Landfill: Daily Waste Acceptance Limit**  
(Pages 2, 13, and 17 of 11/7/03 Comment Letter)

You indicated that the LEA has the authority to approve increases in daily waste acceptance rate (tonnage) and operating times in the event of a declared emergency and requested condition revisions to reflect this flexibility. The District is proposing the following change to Condition # 19235, Part 18a per your request.

Condition # 19235

18. The Permit Holder shall comply with the following waste acceptance and disposal limits and shall obtain the appropriate New Source Review permit, if one of the following limits is exceeded:
  - a. Total waste accepted and placed at the landfill shall not exceed 11,150 tons in any day (except during temporary emergency situations approved by the Local Enforcement Agency). (basis: Regulation 2-1-301)

**4. S-6 Gas Turbine and S-7 Gas Turbine: Heat Input Limits**  
(Pages 2-4, 8, and 18 of 11/7/03 Comment Letter)

You requested to increase the maximum permitted capacity of the S-6 and S-7 Gas Turbines from the 40 MM BTU/hour to 47.5 MM BTU/hour, and you requested to change the daily and annual heat input limits in Condition # 18773, Part 8 accordingly. You indicated that the 40 MM BTU/hour firing rate that was listed on the original data forms was actually a nominal firing rate based on the low heating value of the fuel rather than the maximum firing rate based on the high heating value of the fuel (the District standard is gross combustion capacity or high heating value as indicated in Regulation 3 Schedule B).

This type of change may constitute a modified source pursuant to Regulation 2-1-234.1. The capacity (40 MM BTU/hour) that was stated on the data forms was used to calculate maximum permitted emissions of NO<sub>x</sub>, CO, POC, PM<sub>10</sub>, SO<sub>2</sub>, and toxic air contaminants for each turbine. These maximum permitted emission rates are generally considered implied emission limits. Increasing the maximum permitted

capacity to 47.5 MM BTU/hour may result in increases in the maximum permitted emission rates. Therefore, your proposed increase in firing capacity may be a modification.

The District has received your permit application to revise the maximum permitted heat input limit for the gas turbines. Since you have disputed the correctness of the District's proposed heat input limit, the District agrees to delete the proposed heat input pending the resolution of this new permit application. The heat input limits have been deleted from Tables II-A, IV-B, VII-B and Condition # 18773, Part 8 and Table VIII have been revised accordingly.

**5. S-23 and S-24 Internal Combustion Engines: Landfill Gas Capacity Description**  
(Page 4 of 11/7/03 Comment Letter)

As you requested, the District has changed the engine capacity description in Table II-A to be 1877 bhp and 17.5 MM BTU/hour instead of as 1877, bhp, 17.5 MM BTU/hour, and 530 scfm of gas at 550 BTU/scf.

**6. S-99 Non-Retail Gasoline Dispensing Facility**  
(Pages 4 and 16 of 11/7/03 Comment Letter)

The District understands that you plan to purchase POC offsets so that you can increase your maximum permitted gasoline throughput rate at S-99. When you have obtained the necessary offsets, please submit your request for a throughput increase as a permit application for a Change of Conditions and an MFR Permit Revision.

**7. Diesel Engines (S-190 through S-198): Capacity Descriptions**  
(Page 4 of 11/7/03 Comment Letter)

Waste Management requested that the engine capacity be listed in terms of horsepower only and that the capacities in terms of displacement, hourly fuel consumption, and hourly heat input be deleted.

The displacement of the engine is necessary to determine an applicable requirement. Specifically, the Regulation 6-301 Ringelmann No. 1 Limitation applies if the displacement is greater than or equal to 1500 cubic inches. Regulation 6-303 Ringelmann No. 2 applies if the displacement is less than 1500 cubic inches. Since some of the displacement values are estimates and that it may be difficult to determine exact displacement values for these engines, the District agrees to indicate the displacement as either:  $< 1500 \text{ in}^3$  or  $\geq 1500 \text{ in}^3$ .

The fuel consumption rate for a single horsepower rating can vary depending on the efficiency of the particular engine. While some pollutant emission rates are calculated based on the horsepower rating for the engine (using emission factors in units of grams per brake horsepower hour), other pollutant emission rates (notably sulfur dioxide emissions) depend on the fuel flow rate. Therefore, it is necessary to express the capacity of the engine in terms of fuel consumption as well as horsepower.

The hourly heat input rate was calculated based on the maximum fuel flow rate for the engine, which was generally provided by the equipment manufacturer. The District agrees that it is not necessary to state both heat input and fuel consumption and will delete the heat input capacity descriptions for these engines. Note that the District plans to continue to maintain these calculated heat input capacities as stored data for each engine, because annual permit renewal fees are based on the hourly heat input rate (see Regulation 3, Schedule B).

**8. Diesel Engines (S-191 and S-192): Model Number Descriptions**  
(Page 5 of 11/7/03 Comment Letter)

The District has corrected the model number for S-191 and S-192 as you requested.

**9. Diesel Engines (S-194, S-195, and S-196): Emergency versus Full Time Operation**  
(Pages 5, 7, 15, and 18 of 11/7/03 Comment Letter)

You asked to change the maximum permitted operating time for these engines from 100 hours per year (for operation during emergencies) to 8760 hours per year (for full time operation).

As stated in the District's January 28, 2003 letter:

"In the absence of specific permit conditions to the contrary, the throughputs, fuel and material consumption, capacities, and hours of operation described in your permit application will be considered maximum allowable limits. A new permit will be required before any increase in these parameters, or change in raw material handled may be made."

The 100 hours per year limitation was taken from the Data Form Diesel completed by Mr. Paul Stout on September 16, 2002. As stated above, an increase in hours of operation requires a permit application for a Change of Conditions. Therefore, the District is not proposing to make any changes to the MFR Permit based on this comment. Please submit a permit application if you still wish to increase the allowable operating hours for S-194, S-195, and S-196.

**10. S-2 Altamont Landfill: Regulation 8, Rule 2 TOC Limit for Soil Handling Operations**  
(Pages 5, 6, 13-14, 16, 19, and 20 of 11/7/03 Comment Letter)

Waste Management requested that Regulation 8, Rule 2 be removed as an applicable requirement and replaced with the permit shield proposed on pages 19-20 of the November 7, 2003 comment letter.

Although the District is not necessarily opposed to the establishment of a permit shield as described in your comment letter (except as noted below), this request will require a new public notice because it constitutes a significant revision of the MFR Permit. Therefore, the District is not proposing to make any changes to the MFR Permit at this time. Please submit your request to establish a permit shield as a permit application for a significant revision of the MFR Permit.

The District wishes to clarify that Table IX-A listed on page 20 of the Waste Management comment letter is for subsuming Regulation 8-2-601. Regulation 8-2-301 would remain an applicable requirement in Table IV-A (and Regulation 8, Rule 2 would not be deleted entirely as you requested on page 5). However, demonstrating compliance with Regulation 8-2-301 would be accomplished using Regulation 8-40-604 rather than Regulation 8-2-601. During the establishment of these types of permit shields, the District typically recommends permit conditions requiring testing of each soil lot using the methods described in Regulation 8-40-604.

**11. S-6 and S-7 Gas Turbines: Key Emission Control System Operating Parameters**  
(Pages 6, 8, and 18 of 11/7/03 Comment Letter)

Waste Management stated the gas turbine outlet temperature be considered a key emission control system operating parameter (subject to Regulations 8-34-509 and 8-34-501.11).

The District agrees to make the changes you requested. For the gas turbines, all instances of Regulation 8-34-507 will be replaced by Regulation 8-34-509 and all instances of Regulation 8-34-501.3 will be replaced by Regulation 8-34-501.11.

**12. S-6 and S-7 Gas Turbines: NSPS Subpart GG Daily Nitrogen Content Monitoring**

(Pages 6, 7, and 17 of 11/7/03 Comment Letter)

Waste Management has requested a custom fuel nitrogen content monitoring schedule from EPA to replace the daily fuel nitrogen content monitoring required by 40 CFR 60.334(b)(2). Waste Management requested that annual testing for NO<sub>x</sub> emissions from the turbines' exhaust substitute for daily testing for nitrogen content in the landfill gas. Waste Management requested a Schedule of Compliance for up to two years while EPA is reviewing this requested custom schedule.

Although the daily fuel nitrogen content testing requirement (40 CFR 334(b)(2)) remains in effect until EPA has approved a custom schedule, Subpart GG contains no test method for testing gaseous fuels for fuel bound nitrogen content. Since EPA must approve any test methods for NSPS requirements, the District has indicated in Table VII-B that no testing is required until EPA approves a test method.

The only nitrogen compound in landfill gas that is expected to have a significant concentration is nitrogen gas from air intrusion. Although the nitrogen gas concentration in landfill gas can vary on a daily basis, these variations are not expected to impact this site's ability to comply with the EPA NO<sub>x</sub> emissions limit, because the District's NO<sub>x</sub> emission limit (42 ppmv NO<sub>x</sub> at 15% oxygen, dry) is much lower than the EPA limit (150 ppmv NO<sub>x</sub> at 15% oxygen, dry). This EPA limit has not been adjusted upward for the efficiency of the turbine (Y=14.4, the maximum allowable level) or for fuel bound nitrogen (F=0), and it represents the lowest applicable EPA NO<sub>x</sub> emission limit. Four site-specific tests showed NO<sub>x</sub> emissions ranging from 19 to 35 ppmv of NO<sub>x</sub>. The maximum measured NO<sub>x</sub> emission rate complies with the District NO<sub>x</sub> emission limit and is less than one fourth of the EPA NO<sub>x</sub> emission limit. Any small variations in NO<sub>x</sub> emissions due to changes in the nitrogen concentration in the landfill gas will not affect compliance with the EPA NO<sub>x</sub> emission limit, because the compliance margin is high.

The District also notes that EPA proposed revisions to Subpart GG on April 14, 2003. If these revisions are approved, the daily nitrogen content testing would no longer be required because Waste Management is not using a fuel bound nitrogen content level to adjust the NO<sub>x</sub> emission limit.

A Custom Schedule of Compliance has been included in Section V of the Title V permit. It requires the facility to comply with the requirement after receiving approval from EPA for a test method. Please note that a schedule of compliance does not sanction non-compliance.

**13. S-6 and S-7 Gas Turbines: Condition # 18773, Part 6, Section 8-34-113 Clarification**

(Page 8 of 11/7/03 Comment Letter)

As you requested, the District has added text to clarify that all control devices may be shut down for short periods of time if the requirements of BAAQMD Regulation 8-34-113 are followed.

**14. Condition # 18773, Part 8 and Condition # 19235, Part 2, Temperature and Pressure**

**References** (Pages 8-9, 10, 12, and 17 of 11/7/03 Comment Letter)

As you requested, the District has changed the temperature and pressure for reporting standardized gas flow rates to 68 degrees F and 1 atmosphere. Note that this change also requires a change to the methane heat content and the target gas collection rate. From the Chemical Engineers' Handbook, the gross heat content for methane is 1013 BTU/ft<sup>3</sup> with gas volume corrected to 60 °F and 30 in. Hg dry. This methane heat content is equivalent to 997.7 BTU/ft<sup>3</sup> at 68 °F and 1 atm. The equivalent target gas collection rate is 2381 cfm at 68 °F and 1 atm.

**15. Condition # 18773, Part 9, Frequency of Gas Turbine Combustion Chamber Discharge Temperature Monitoring** (Pages 9 and 17 of 11/7/03 Comment Letter)

The District is evaluating your requested amendments to the Design Plan pursuant to Application # 8303. The frequency of the combustion chamber temperature monitoring will be addressed in any condition amendments proposed pursuant to Application # 8303.

**16. Condition # 18773, Parts 10 and 11d, Condition # 19235, Part 11:  
Sulfur Content Monitoring** (Pages 9, 11, 16, 17, and 18 of 11/7/03 Comment Letter)

The District believes that your comments on these conditions were based on a preliminary draft of the MFR Permit and not on the draft that was issued for public notice. In the public noticed draft MFR Permit, the sulfur content testing in Condition # 18773, Part 10 and Condition # 19235, Part 11 reference the EPA approved method for which the District cannot approve alternatives. Condition # 18773, Part 11d has no SO<sub>2</sub> testing requirement. No changes are being made based on these comments.

**17. Condition # 18773, Part 11, Time Period to Submit Source Test Reports**  
(Pages 9, 12, 14, and 15 of 11/7/03 Comment Letter)

As you requested, the District is changing the time period in which source test reports are due to be submitted to the District from 45 days after the test to 60 days after the test.

**18. Condition # 19235, Part 2, New Target Gas Collection Rate**  
(Page 9 of 11/7/03 Comment Letter)

The District is evaluating your request for a new target gas collection rate pursuant to Application # 8303. Any condition amendments proposed pursuant to Application # 8303 will be handled as a revision to the MFR Permit.

The District has corrected the error in Part 2 that referenced 8-34-308 instead of 8-34-508.

**19. Condition # 19235, Part 4, Landfill Gas Flare Heat Input Rate**  
(Pages 11 and 17 of 11/7/03 Comment Letter)

For Part 4, the landfill gas flare (A-15) heat input limit was based on the maximum firing capacity of 70.98 MM BTU/hour that was reported for A-15 in Application # 3821. The daily heat input rate (70.98\*24) of 1703.52 MM BTU/day was rounded to 1704 MM BTU/day for Part 4. The annual heat input rate was calculated as follows:  $70.98 * 24 * 365 = 621,785$  MM BTU/year. Since all annual emission calculations used a heat input rate of 621,785 MM BTU/year, increasing this limit would increase maximum permitted emissions (albeit by a very small amount) and would be considered a modification. This type of change requires a permit application, and no changes will be made at this time.

**20. Condition # 19235, Part 5, Landfill Gas Flare Alarms**

(Page 11 of 11/7/03 Comment Letter)

The District agrees that alarms do not need to be activated when enough control devices are being operated to control the target gas collection rate. The District has clarified Part 5 accordingly.

**21. Condition # 19235, Parts 12 and 14, Acrylonitrile Limit and Testing**

(Pages 11-12 of 11/7/03 Comment Letter)

As discussed with Ms. Karen Hurst of Waste Management in April 2003, acrylonitrile has a significant impact on facility risk, even at the low concentration of 500 ppb in landfill gas, due to the high toxicity of acrylonitrile. For such a significant compound, the District is not willing to eliminate all testing on the basis of one or two tests. However due to the added expense of the acrylonitrile testing, the District is willing to reduce the frequency for the acrylonitrile testing requirement to once every four years. Every four years was chosen as the frequency, because it is consistent with the AB-2588 Air Toxics Hot Spots Act inventory update requirement. Part 14 has been modified accordingly.

**22. Condition # 19235, Part 13, Benzene, Formaldehyde, and Vinyl Chloride Testing**

(Page 12 of 11/7/03 Comment Letter)

The toxic air contaminant emission rates (including benzene, formaldehyde, vinyl chloride, and other compounds) that were calculated during the evaluation of this flare for an Authority to Construct were used in a risk screening analysis to determine compliance with the District's Toxic Risk Management Policy. These calculated emission rates were 72.7 pounds/year of benzene, 29.1 pounds/year of vinyl chloride, and 196.6 pounds/year of formaldehyde based on assumed landfill gas concentration data and a minimum destruction efficiency of 85% for each individual compound.

From the initial compliance demonstration source test for A-15, benzene and vinyl chloride were not detected in any of the three runs, and formaldehyde was detected in only one of three runs. This test indicated that the flare was achieving greater than 95% destruction efficiency for both benzene and vinyl chloride and that all emission rates (calculated based on the detection levels) were less than 20% of the expected emission rates listed above. After evaluating these test results, the District agrees to delete the testing requirement for benzene, formaldehyde, and vinyl chloride, because the compounds were generally not detected in the flare exhaust and all emission rates (based on detection levels) are well below the expected emission rates.

**23. Condition # 19235, Part 16, Reimbursement of Offsets**

(Pages 12-13 of 11/7/03 Comment Letter)

The District's permit condition language is consistent with Regulation 2-4-303.5, which prohibits banking of emission reductions at "facilities belonging to companies which have received unreimbursed offsets from the Small Facility Emissions Bank." This banking restriction would apply even if the permit condition were deleted all together. The District believes the existing permit condition language appropriately clarifies Regulation 2-4-303.5. Therefore, the District is not making any changes based on this comment.

**24. S-23 and S-24 Internal Combustion Engines: Key Emission Control System Operating Parameters** (Pages 12-13, 18, and 19 of 11/7/03 Comment Letter)

Several comments concerned your requested permit condition changes for the IC Engines pursuant to Application # 8324. The District is proposing a significant revision to the draft MFR Permit in a separate action. These proposed condition changes are expected to address all of the comments you made in your November 7, 2003 letter that are related to this issue. Please review the permit condition changes in the proposed significant revision and provide any additional or new comments during the public comment period for Application # 8324.

**25. Condition # 19237, Part 10, Benzene, Formaldehyde, and Vinyl Chloride Testing**  
(Page 14 of 11/7/03 Comment Letter)

From the October 8, 2002 Source Test, vinyl chloride was not detected in any of the samples and vinyl chloride emissions, calculated based on the detection level, were well below the expected emission rates. The detected benzene emissions were also well below the expected emission rates. Since the benzene and vinyl chloride emissions were well below the expected level, the District agrees to delete the testing requirement for these compounds.

The October 8, 2002 Source Test determined that formaldehyde emissions were higher than the expected emission rate of 261.3 pounds/year per engine. Although the formaldehyde emission rates were an order of magnitude higher than expected, the District's conclusions regarding the Toxic Risk Management Policy were the same. Therefore, the District issued the Permit to Operate for these engines. Since formaldehyde emissions were considerably higher than expected, additional formaldehyde testing is warranted to verify the formaldehyde emission rate for these engines. Currently, this testing is required once every four years. The District is not proposing any additional changes to this testing frequency.

**26. S-19 Transfer Tank with Siphon Pump** (Page 15 of 11/7/03 Comment Letter)

The District notes your request to convert S-19 from a back-up device to full time operation. This type of change is considered an alteration pursuant to Regulation 2-1-233 and requires a permit application. If you need to also increase the maximum permitted throughput rates for S-19, this change will also be considered a modification. Please submit your requests concerning S-19 as a permit application. Any modifications to the MFR Permit that are necessary will be made in conjunction with this future permit application.

**27. Diesel Engines (S-191, S-192, S-193, S-197, and S-198): Record Keeping Requirements** (Page 15 of 11/7/03 Comment Letter)

The proposed records were intended to gather the data necessary to establish and verify baseline emission rates for these engines. Since some emission factors are based on fuel usage and some factors are based on engine size and operating time, both fuel usage data and operating time data are necessary. Keeping monthly operating time and fuel usage records is a cost effective method of demonstrating compliance with Regulations 2-1-301 and 9-1-304. The District agrees to delete the daily record keeping requirement as you requested.

**28. Condition # 20922, Part 4 for S-140 and S-141: Wastewater Test Method**  
(Pages 16 and 19 of 11/7/03 Comment Letter)

As you requested, the District is proposing to add EPA Method 8260B as an acceptable test method for analyzing the wastewater. Condition # 20922, Part 4 and Table VIII have been modified to include this procedure.

Response to Comments on proposed MFR Permit for A2066

This concludes the District's responses to your comments. The District did not receive any other comments on the draft MFR Permit for your facility. The EPA comment period has also concluded, and EPA submitted no comments on the draft MFR Permit. The District plans to issue the final MFR Permit shortly. The revisions to the draft MFR Permit are included as an attachment to this letter. Please contact Carol Allen at (415) 749-4702 with any questions about these final corrections.

As indicated in the above responses, several modifications to your MFR Permit are pending due to the District's proposed decision on Application # 8324 or to other uncompleted permit applications. Please address any comments on these pending actions during the public comment period for each permit application as the District's proposed decisions are publicized.

Sincerely yours,

---

Jack Broadbent  
Executive Officer / APCO

Attachments

SAH:myl

H:\pub\_data\titlev\permit\issue-P\2003\03November\A2066Issuance.doc

## **ATTACHMENT 1**

### **REVISIONS TO DRAFT MFR PERMIT**

**ATTACHMENT 2**

**COMMENT LETTER FROM WASTE MANAGEMENT  
(without attachments)**