

December 15, 2005

Mr. Ken Lewis  
District Manager  
**Waste Management of Alameda County**  
10840 Altamont Pass Road  
Livermore, CA 94550

**Application Number:** 9527  
**Plant Number:** A2066  
**Equipment Location:** 10840 Altamont Pass Road  
Livermore, CA 94550

**ALAMEDA COUNTY**

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(Chairperson)  
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Tim Smith  
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Jack P. Broadbent  
**EXECUTIVE OFFICER/APCO**

Dear Mr. Lewis:

This is to advise you that the Bay Area Air Quality Management District is issuing a significant revision to the Major Facility Review Permit for Waste Management of Alameda County (Facility # A2066). The District's response to the November 21, 2005 comment letter that was submitted on your behalf by Shaw Environmental is provided below.

On October 4, 2005, the District proposed a significant permit revision for this facility. The purpose of this revision is to allow an alternative monitoring procedure that will demonstrate compliance with the Regulation 8-2-301 total carbon limits, which apply to VOC-laden soil handling activities at the S-2 Altamont Landfill. Incorporation of the proposed alternative monitoring procedures requires a permit shield that replaces the Regulation 8-2-601 stack testing procedures with the fugitive emission monitoring procedures identified in Regulation 8-40-604. The District also proposed revisions to Condition # 19235, Part 20, Table VII-A, and Table VIII to describe the new monitoring procedures and clarify the applicable limits. This proposed revision does not result in any emission increases.

The EPA comment period ended on November 20, 2005. The public comment period ended on November 23, 2005. No comments were received from the public or EPA. One comment letter was received on November 21, 2005, from Mr. Paul Stout of Shaw Environmental, Inc., a consultant for the facility. The District's response to this comment letter is detailed below.

Mr. Stout requested changes to the proposed conditions that would clarify that the limits in Part 20 apply to VOC-laden soil and not to all VOC-laden wastes (which could be incorrectly interpreted to include municipal solid waste). The District agrees to make these requested revisions.

Mr. Stout also requested permit revisions that would limit the applicable requirements in Part 20 to soil that is "used as cover material". The District does not agree to include this additional restriction on the applicability of Part 20. Part 20 describes limits and monitoring procedures that will ensure compliance with Regulation 8-2-301. Since Regulation 8-2-301 applies to any VOC-laden soil operation that results in total carbon emissions, and such operations could include aeration that occurs during the storage and handling of soil that is directly

disposed in the landfill or that is used for purposes other than cover material, it would not be appropriate to limit the monitoring procedures to only soil that is used as cover material. Therefore, the District is not proposing to include the requested language concerning cover material.

The District's final revisions to Part 20 and Table VIII are identified below. The District's initial proposed revisions are identified by single strike through and single underlined text. Mr. Stout's proposed additional language is shown in bold italic text. The District's final revisions are identified by double strike through and double underlined text.

20. ~~The Permit Holder shall limit the quantity of VOC laden soil handled per day so that no more than 15 pounds of total carbon could be emitted to the atmosphere per day. This Part applies to the acceptance, handling, storage, and on-site reuse of VOC-laden soil and other VOC laden wastes. VOC-laden soil and VOC laden wastes is any are materials~~ ***is any soil used as cover material*** that contains s volatile organic compounds, as defined in Regulation 8-40-213, ~~at a concentration of 50 ppm by weight or less other than contaminated soil.~~ As defined in Regulation 8-40-205, contaminated Ssoil containings more than 50 ppmw of VOC or has a surface concentration greater than 50 ppmv of VOC as C1, is considered to be "contaminated soil" and contaminated soil is subject to Part 21 below instead of this part. Materials containing only non-volatile hydrocarbons and materials meeting the requirements of Regulation 8-40-113 are not subject to this part. For each lot of VOC-laden waste ***soil*** accepted at this site, the Permit Holder shall comply with the limits and monitoring procedures identified in either subpart a or subpart b below to demonstrate compliance with the total carbon limits in Regulation 8-2-301.
  - a. Unless the Permit Holder demonstrates compliance with Regulation 8-2-301 in accordance with subpart b below, the Permit Holder shall limit the quantity of VOC laden wastes ***soil*** handled per day such that no more than 15 pounds of total carbon could be emitted to the atmosphere per day. In order to demonstrate compliance with this condition-subpart, the Permit Holder shall maintain the following records in a District approved log for all VOC-laden soil accepted at the landfill.
    - aj. Record on a daily basis the amount of VOC laden soil handled at the landfill-accepted for each truckload or each soil lot, as appropriate. This total amount (in units of pounds per day) is Q in the equation in subpart e.a(iii) below.
    - bj. Record on a daily basis the VOC content of all soils handled at the landfill for each truckload or each soil lot, as appropriate. This VOC Content (C in the

equation below) should be expressed as parts per million by weight as total carbon (or C1).

- eiii. Calculate and record on a daily basis the VOC Emission Rate (E) using the following equation:  $E = Q * C / 1E6$

This equation may be applied to each truckload or to each soil lot received per day depending on the amount of soil that is represented by the VOC Content data. If the equation is applied to multiple loads per day, the VOC Emission Rate shall be totaled for all loads received each day.

- div. Summarize all daily emission rates on a monthly and calendar year basis.

- v. All records shall be maintained on site or shall be made readily available to District staff upon request for at least 5 years from the date of entry.

- b. Unless the Permit Holder demonstrates compliance with Regulation 8-2-301 in accordance with subpart a above, the Permit Holder shall screen each lot of VOC laden ~~waste~~ **soil** accepted per day for VOC surface emissions to show that each lot of VOC laden waste is not contaminated soil.

- i. The Permit Holder shall use the testing procedures outlined in Regulation 8-40-604.

- ii. The screening test shall be representative of the entire lot of VOC-laden ~~waste~~ **soil**. The soil surface shall be disturbed prior to screening to ensure that the screening is representative of the entire load.

- iii. The Permit Holder shall maintain records of all testing conducted to satisfy this subpart and shall record the amount of VOC-laden ~~waste~~ **soil** accepted and the highest surface concentration measured pursuant to this subpart. These records shall be maintained for each truckload or each soil lot accepted, as appropriate, provided that the records are made or summarized on at least a daily basis.

- iv. Summarize the daily ~~waste~~ **VOC-laden soil** acceptance rates and the weighted average of the surface concentration records on a monthly basis and for each calendar year.

- v. All records shall be maintained on site or shall be made readily available to District staff upon request for at least 5 years from the date of entry.

(Basis: Regulation 8-2-301)

**Table VIII  
Test Methods**

Applicable Requirement	Description of Requirement	Acceptable Test Methods
...		
BAAQMD Condition # 19235, Parts 20 and 21	<p>Testing to Determine if <del>Waste Cover Material</del> Soil is Contaminated Soil or VOC Laden <del>Waste</del> Soil;</p> <p>VOC Concentration in Soils;</p> <p>OR</p> <p>Surface VOC Concentration</p>	<p>BAAQMD 8-40-601 and EPA Reference Methods 8015B and 8021B; or EPA Reference Method 21 (or any method determined to be equivalent by the US EPA and approved by the APCO); OR</p> <p>BAAQMD Regulation 8-40-604 measurement procedures and EPA Method 21 (or any method determined to be equivalent by the US EPA and approved by the APCO)</p>
BAAQMD Condition # 19235, Part 20a	<p>Total Carbon Emissions from Aeration of VOC Laden Soils</p>	<p>APCO approved equation identified in Condition # 19235, Part 20a with VOC Content determined as described above for VOC Concentration in Soils.</p>
...		

The District has decided to issue the revised permit incorporating the proposed significant revision with the modifications to Part 20 and Table VIII that are noted above. Enclosed is a copy of the final revised permit. If you have any questions regarding this permit, please call Carol Allen, Senior Air Quality Engineer, at (415) 749-4702.

Sincerely yours,

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Jack P. Broadbent  
Executive Officer / APCO

Enclosure: Final MFR Permit for Site # A2066  
JPB:BFB:CSA