

November 2, 2007

Ms. Deborah Jordan, Director  
Air Management Division  
**United States Environmental Protection Agency**  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Jordan:

**ALAMEDA COUNTY**

Tom Bates  
Scott Haggerty  
Janet Lockhart  
Nate Miley

**CONTRA COSTA COUNTY**

John Gioia  
Mark Ross  
(Chair)  
Michael Shimansky  
Gayle B. Uilkema

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO COUNTY**

Chris Daly  
Jake McGoldrick  
Gavin Newsom

**SAN MATEO COUNTY**

Jerry Hill  
(Vice-Chair)  
Carol Klatt

**SANTA CLARA COUNTY**

Erin Garner  
Yoriko Kishimoto  
Liz Kniss  
Patrick Kwok

**SOLANO COUNTY**

John F. Silva

**SONOMA COUNTY**

Tim Smith  
Pamela Torliatt  
(Secretary)

Jack P. Broadbent  
**EXECUTIVE OFFICER/APCO**

This is to advise you that the Bay Area Air Quality Management District is issuing a renewal of the Major Facility Review (Title V) Permit for Tri-Cities Waste Management (Facility # A2246) pursuant to Application #14588. The District proposed a Notice Inviting Written Public Comments regarding the renewal MFR permit for this facility on May 8, 2007. No comments were received from EPA or the public. However, Tri-Cities Waste Management (TCWM) made the following comments on the proposed permit:

1. The number of vertical gas extraction wells listed in Condition #8366, Part 2 should be changed from 25 to 28 in order to correctly reflect the current authorized total.
2. *Regarding compliance with Regulation 8-2-301:* TCWM does not want a daily limit on the amount of VOC laden soil that may be used as landfill cover material (see Permit Condition #8366, Part 17b.). TCWM contends that they can demonstrate compliance with Regulation 8-2-301 (VOC emissions not to exceed 15 lb/day and 300 ppmv as C1) by using the analytical soil sampling methods described in Regulation 8-4-602).

The District supports Comment #1 made by TCWM and has made corrections in the Final Title V Permit. The District does not agree with Comment #2 because the proposal does not include a daily VOC limit or VOC concentration monitoring, so it does not demonstrate compliance with Regulation 8-2-301. The District has chosen to keep Condition #8366, Part 17b in the permit, but has added a third compliance option (subpart c.) in the Final Title V Permit to address the concerns of the facility. The District provided a written response to TCWM's comments in a letter to Richard Merrill of Shaw Environmental dated August 15, 2007.

The final renewal Title V permit can be downloaded from the BAAQMD website at [http://www.baaqmd.gov/pmt/title\\_v/public\\_notices.htm](http://www.baaqmd.gov/pmt/title_v/public_notices.htm). We will also send the final permit to you via the Electronic Permit Submittal System. If you have any questions regarding this project, please call Dennis T. Jang, Senior Air Quality Engineer, at (415) 749-4707.

Very truly yours,

Signed by Jack P. Broadbent \_\_\_\_\_  
Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

JB:BFB:rth