

COUNTY OF SONOMA  
DEPARTMENT OF TRANSPORTATION  
AND PUBLIC WORKS  
2300 COUNTY CENTER DRIVE, SUITE B-100  
SANTA ROSA, CALIFORNIA 95403  
Phillip M. Demery, Director



AREA CODE (707)  
ROADS ..... 565-2231  
TRANSIT ..... 585-7516  
REFUSE ..... 565-7940  
AIRPORT ..... 565-7243  
AIR POLLUTION..... 433-5911  
FAX ..... 565-2620  
www.sonomacountypublicworks.com

March 10, 2008

File: 50-01-17.100

Mr. Ted Hull  
Senior Air Quality Engineer  
Permit Services Division  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

Sent Via Fax: 415/749-5030

RE: Sonoma County Central Landfill, Plant Number A2254  
500 Meham Road, Petaluma, CA 94952

Dear Mr. Hull:

Sonoma County is pleased to provide comments on the draft Major Facility Review (MFR) permit dated January 7, 2008, for the Sonoma County Central Landfill (Plant Number A2254). Most of the provisions in the document are acceptable to the County. However, the County has identified minor corrections that should be included in the final permit.

**Section I Standard Conditions, Condition F (Page 5)**

The six-month reporting periods for monitoring reports seems to have changed. It used to end on January 31<sup>st</sup> and the next period began on February 1<sup>st</sup>, now it ends on February 1<sup>st</sup> and begins on February 2<sup>nd</sup>. It would be preferable to have the periods be in whole months instead of one day of one month included in one of the reporting periods and the remainder of the month is in another period. Was there a specific reason this was changed?

**Section IV Source-Specific Applicable Requirements**

**Table IV-A**

Permit Conditions 4044, Parts 11 through 20 in Table IV-A (Page 28) are inconsistent with Section VI Permit Conditions. Please update Table IV-A to reflect the new permit conditions.

**Section VI Permit Conditions**

Condition 4044, Part 5b (Page 34) makes reference to Part 4a for landfill gas collection system components. There is no longer a Part 4a to Condition 4044 and the reference, therefore, should be to Part 4.

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Condition 4044, Part 13 (Page 38) makes reference to the old Part 11 for the landfill gas flow rate recorder and should state Part 14.

Condition 4044, Part 16 (Page 38) makes reference to the old A-2 Flare and should state the A-3 Flare.

Condition 4044, Part 19h (Page 40) makes reference to Part 4a for continuous operation and should state 5a?

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


#### **Table VII-A**

Please correct Table VII-A, Collection System Installation Dates (Pages 51 and 52) that makes reference in two places to the old condition Part 4b.

Please correct Table VII-A, CO (Page 58) that makes reference to Permit Condition 4044, Part 17 and should state Part 12.

The County again appreciates the opportunity to provide comments on the MFR permit for the Sonoma County Central Landfill. If you have any questions regarding our comments, please do not hesitate to contact me at 707-565-7940

Very truly yours,

  
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Keith Foszcz  
Civil Engineer

c: Trish Pisenti, Alex Sebastian