

COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

January 22, 2001

TO: WM. DEBOISBLANC, DIRECTOR, PERMIT SERVICES

FROM: JIM GUTHRIE, DIRECTOR OF ENFORCEMENT

SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

BROWNING-FERRIS INDUSTRIES OF CA, INC (P#2266)

In keeping with standard practice, the Compliance and Enforcement Division has conducted a review of the compliance record of:

Browning-Ferris Industries (BFI) of CA, Inc

This memorandum is intended to provide you with the results of the review, and to advise of further action, if any, that will be initiated by the Director of Enforcement.

Background

It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of the initial renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on going compliance.

Finding

The Enforcement Division staff has commenced a review of the records for the BFI for the period of 1/1/00 to 1/1/01. This review was initiated as part of the District evaluation of an application by BFI for a Title V Permit. During the period subject to review, BFI's activities known to the District include:

Two Notices of Violation (NOV) were issued during this review period. The first NOV (#3673) was for 4 days of not operating the landfill gas flare due to a fire on the blower of the flare. The second NOV (#3674) was for 4 days of not operating the landfill gas flare due to the flame arrestor on the flare being damaged by heat.

The District did not receive any alleged complaints of odor during the review period.

BFI is not under a variance or an Order of Abatement by the District.

Four equipment breakdowns were reported by BFI. Two of the breakdowns were granted breakdown relief and two of the breakdowns resulted in issuance of the NOVs.

As a result of this record, District staff met once on 8-7-00, to discuss breakdown policy and procedures. Staff and BFI personnel were able to discuss improvements in the plant's breakdown procedures.

Conclusions

The Director of Enforcement finds that on-going compliance can be reasonably assured for this facility, for the review period, due to 2 NOVs, 0 complaints received, and 4 breakdowns. After meeting with BFI staff to inform them of breakdown policy and procedures, the District has not received any episodes.

Recommendations

The Director of Enforcement believes that the proposed application for a Title V Permit is adequate and recommends that the Director of the Permit Services Division approve this application.

PAH; TG; JB; JRG

cc: Brenda Cabral