

October 22, 2003

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Trent Cave
Napa-Vallejo Waste Management Authority
1195 Third Street, Room 101
Napa, CA 94559

Application Number: 2631
Plant Number: A9183
Equipment Location: End of Eucalyptus Road
Napa, CA 94558

Dear Mr. Cave:

The District has reviewed your comments on the July 16, 2003 preliminary draft of the Major Facility Review (MFR) Permit for Napa-Vallejo Waste Management Authority (Facility # A9183). The District's responses to your comments are provided below. The attached documents show the changes that have been made to the preliminary drafts of the MFR Permit and Statement of Basis in response to your comments and District staff comments.

Response to Comment 1

Given the nature of landfill gas generation at landfills, the District understands your concerns about the statement in Section I.B.1 that "the facility may not operate ..." if a renewal application is not submitted in a timely manner. Obviously a landfill operator cannot "turn off" landfill gas generation; and the District would not want you to discontinue operation of the collection and control systems, since significant adverse consequences may occur if these systems were shut down for prolonged periods of time. However, the District is required to have the language in Section I.B.1 in the MFR Permit in order to compel facilities to submit the required renewal application.

The District hopes that it will not ever be necessary to use the provisions of Section I.B.1 to compel any facility to submit the renewal application. If it becomes necessary, the District would give sufficient warning before imposing a shut down requirement on a facility and would give due regard to public safety before imposing such a requirement. I agree that the language of Section I.B.1 does not seem to fit well with closed landfills. In such cases, the District could impose penalty fees for continuing to operate after the renewal application deadline, if a renewal application has not been submitted.

In Section I.B.1, the District is providing a reasonable time period (a six-month window) in which to submit the renewal application and ample time (five years) in which to budget and plan for meeting the renewal application deadline. Therefore, meeting the renewal application deadline should not be an issue.

Response to Comment 2

You stated in your letter that a number of new wells have been installed at your site and that you were going to have your consultant submit a verified well count to the District. We have not received any additional information about the number of wells that have been installed and are now operating. Therefore, the District will not be changing any well counts or permit conditions as a result of this comment.

Please provide the final as-built drawings for the gas collection system modifications that have been performed pursuant to Authority to Construct Numbers 3286 and 6740 and provide the initial operation date (date connected to vacuum) for each new well (as required by these Authorities to Construct). The final changes to the permit conditions and equipment descriptions that are necessary to issue the Permits to Operate under Applications # 3286 and # 6740 will be made after we have received this information. These changes will be incorporated into the MFR Permit pursuant to the minor revision procedures identified in Regulation 2-6-414.

Response to Comment 3

Although you may not have any equipment or operations currently on your site that are subject to some of the generally applicable requirements that are listed in Table III of your permit, the District has found that many facilities become subject to one or more of these requirements due to temporary operations. Rather than having to change your MFR Permit before you could sandblast and paint a building, the District has included these and several other commonly applicable rules in Table III. Also, many facilities have operations that are subject to these rules (such as aerosol painting or small solvent cleaners) even though the operations are exempt from permit requirements. No changes are proposed in response to this comment.

Response to Comment 4

Since the amount of gas that will be collected by the new wells is not known exactly, it is possible (based on a projected generation rate of 728 cfm) that your collection rate could exceed the capacity of the GRS engines (630 cfm). If this occurs, excess gas should be vented to A-2. If no surface emissions are occurring while both engines are operating and the collection rate is at least 75% of projected rate (546 cfm) but less than 630 cfm, then operation of A-2 (while both engines are operating) will not be necessary. Operation of A-2 is required whenever one or more engines are down. Part 2 of Condition # 12418 will be modified to more clearly reflect the operating requirements discussed above.

Response to Comment 5

The District is proposing several revisions to part 14 in response to your comment, comments from internal staff, and comments on proposed MFR Permits at other landfill sites. In order to clarify the testing requirements, the District is proposing to list the specific compounds that you should test for. The District is proposing to delete language allowing you to remove compounds from the testing list, because this language was confusing and the new proposed test list has been significantly streamlined from the AP-42 list of compounds. Also, the District received adverse comments on the language allowing changes to the testing list from EPA and others. If - after conducting sufficient testing - you feel that a compound should be removed from this new list or that the testing frequency should be reduced, you may submit a permit application for a change of permit conditions.

Response to Comment 6

It was the District's intention that the Regulation 8-34 annual report, NESHAPs semi-annual report, and Section I.F semi-annual reports be combined into one document, provided that this document has all elements required by the three distinct reporting requirements. The last sentence of Part 16 clarifies this intention.

Response to Comment 7

District records indicate that the Permit Holder for this site is "Napa-Vallejo Waste Management Authority". Please clarify your request. Do you mean that you want to change the Permit Holder to be "American Canyon Sanitary Landfill" instead of Napa-Vallejo Waste Management Authority? Or, do mean that instances where the site was called "American Canyon Landfill" should be changed to say "American Canyon Sanitary Landfill"? For the latter request, the necessary changes have been accomplished in the Statement of Basis.

Response to General Comments

I have received comments from staff expressing concerns about the compliance history of this site and requesting more frequent reporting until on-going compliance has been reasonably assured. The District considered requiring additional reporting in the form of a permit condition to address this concern. However, recent staff inspections indicated that the surface emission excesses have been resolved by the successful installation and operation of new wells and the landfill gas flare. Continued proper operation of this equipment and compliance with the monitoring requirements in Regulation 8, Rule 34 are expected to ensure compliance with applicable emission limits. Therefore, staff has determined that the standard Title V reporting requirements and the monitoring, record keeping, and reporting requirements in this proposed MFR Permit are sufficient to ensure compliance.

All Title V facilities are required to submit semi-annual compliance monitoring reports (Section I.F) and annual compliance certifications (Section I.G and Regulation 2-6-426). Any instances of non-compliance must be reported to the District pursuant to Sections I.F and I.H. Your vigilance is required to ensure that this facility remains in compliance with all applicable requirements and that all reporting requirements are met. I suggest you thoroughly review all standards, limits, monitoring, record keeping, and reporting requirements in the proposed MFR Permit with each of

your operators, contractors, and/or consultants to ensure that each person understands their obligations for ensuring compliance with this permit.

You expressed concerns that the SSM Plan required by the NESHAP would conflict with Regulation 8, Rule 34. The District is not aware of any aspects of these plans that would create a conflict with any existing requirements. On the contrary, the SSM plan is intended to summarize the steps you should take in the event of a problem in order to minimize emissions and return to normal operations as soon as possible. This plan would be an ideal place for highlighting MFR Permit reporting requirements and procedures needed to comply with District breakdown provisions. In essence, this plan could be your own guide to compliance. If you would like to submit a draft of your SSM plan to the District, District staff will review and comment on it as a courtesy, but District review/approval of these plans is not required.

Conclusion

The District plans to issue a public notice requesting comment on this draft shortly. Pursuant to Regulations 2-6-411.1 and 2-6-412.3, the public notice period will last for 30 days and will occur concurrently with the 45-day EPA review of this draft permit. Your facility will be notified under a separate letter of the commencement of the public notice period.

Please contact me at (415) 749-4702 with any immediate comments or corrections. All other comments should be submitted to the attention of the Permit Services Division during the formal public notice period.

Sincerely,

Carol S. Allen,
Senior Air Quality Engineer

CSA:csa

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