

December 22, 2003

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

Attention: Mr. Trent Cave, Authority Manager

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

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Willie Brown, Jr.
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Jake McGoldrick

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY
Liz Kniss
Patrick Kwok
Julia Miller
Dena Mossar

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

Jack Broadbent
EXECUTIVE OFFICER/APCO

Dear Mr. Cave:

The requirement for public and EPA review of the proposed Major Facility Review (MFR) Permit for the facility identified above has been completed. No comments from EPA or the public were received.

The District has reviewed your December 3, 2003 comment letter and determined that all of your requested revisions are acceptable. The following changes have been made to the permit based on your comments and District staff comments.

- Revised Condition # 12418, Parts 13, 14, and 16 per your request.
- Made corrections in the glossary to the term HHV and added the term LHV.

The above changes to the permit are described in detail in Attachments 1 and 2. Your comment letter is included as Attachment 3.

The District has decided to issue the Major Facility Review Permit.

Enclosed is a copy of the final permit and your comment letter. Please note that the first monitoring report for this permit will be due on June 30, 2004, and the first compliance certification will be due on December 31, 2004.

If you have any questions regarding this permit, please call Carol S. Allen, Senior Air Quality Engineer, at (415) 749-4702.

Sincerely yours,

Jack Broadbent
Executive Officer / APCO

Enclosures:

Attachment 1 Final Revisions to Condition # 12418
Attachment 2 Final Revisions to Glossary
Attachment 3 Comment Letter from Napa-Vallejo Waste Management Authority
Final MFR Permit

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ATTACHMENT 1

Final Revisions To Condition # 12418

Condition # 12418

FOR: S-1, AMERICAN CANYON SANITARY LANDFILL; AND

FOR: A-2, LANDFILL GAS FLARE; AND

13. In order, to demonstrate compliance with Regulation 8, Rule 34, Sections 301.3 and 412, and Parts 7-12 above, the Permit Holder shall ensure that a District approved source test is conducted annually on the Landfill Gas Flare (A-2). The annual source test shall determine the following:
- a. landfill gas flow rate to the flare (dry basis);
 - b. concentrations (dry basis) of carbon dioxide (CO₂), nitrogen (N₂), oxygen (O₂), total hydrocarbons (THC), methane (CH₄), and total non-methane organic compounds (NMOC) in the landfill gas;
 - c. stack gas flow rate from the flare (dry basis);
 - d. concentrations (dry basis) of NO_x, CO, NMOC, and O₂ in the flare stack gas;
 - e. NMOC destruction efficiency achieved by the flare;
 - f. average combustion zone temperature of the A-2 Landfill Gas Flare during the test period; and
 - g. emission rates (in pounds/hour) of benzene, formaldehyde, and vinyl chloride from the flare (once every four years).

Annual source tests shall be conducted no sooner than 9 months and no later than 12 months after the previous source test. The Source Test Section of the District shall be contacted to obtain approval of the source test procedures at least 14 days in advance of each source test. The Source Test Section shall be notified of the scheduled test date at least 7 days in advance of each source test. The source test report shall be submitted to the Compliance and Enforcement Division and the Source Test Section within 4560 days of the test date.

(basis: RACT, Cumulative Increase, Toxic Risk Management Policy, and Regulations 8-34-301.3 and 8-34-412)

14. To demonstrate compliance with Parts 11-12 above and Regulations 8-34-412 and 9-1-302, the Permit Holder shall conduct a characterization of the landfill gas concurrent with the annual source test required by Part 13 above. The landfill gas sample shall be drawn from the main landfill gas header. In addition to the compounds listed in Part 13b, the landfill gas shall be analyzed for all the organic and sulfur compounds listed below. All concentrations shall be reported on a dry basis. The test report shall be submitted to the Compliance and Enforcement Division and the Source Test Section within 4560 days of the test date.

(basis: Toxic Risk Management Policy, AB-2588 Air Toxics Hot Spots Act, Cumulative Increase, and Regulations 8-34-412 and 9-1-302)

Organic Compounds

acrylonitrile
benzene
carbon tetrachloride
chlorobenzene
chlorodifluoromethane
chloroethane
chloroform
1,1 dichloroethane
1,1 dichlorethene
1,2 dichlorethene
1,4 dichlorbenzene
dichlorodifluoromethane
dichlorofluoromethane
ethylbenzene

Organic Compounds

ethylene dibromide
fluorotrichloromethane
hexane
isopropyl alcohol
methyl ethyl ketone
methylene chloride
perchloroethylene
toluene
1,1,1 trichloroethane
1,1,2,2 tetrachloroethane
trichloroethylene
vinyl chloride
xylenes

SulfurCompounds

carbon disulfide
carbonyl sulfide
dimethyl sulfide
ethyl mercaptan
hydrogen sulfide
methyl mercaptan

16. The annual report required by BAAQMD Regulation 8-34-411 shall be submitted in two semi-annual increments. The reporting period for the first increment of the Regulation 8-34-411 annual report that is submitted subsequent to the issuance of the MFR Permit for this site shall be from December 1, 2003 through ~~last day of the month that is 6 months after MFR Permit issuance date~~ May 31, 2004. This first increment report shall be submitted by ~~last day of the month following the end of the reporting period~~ June 30, 2004. The reporting periods and report submittal due dates for all subsequent increments of the Regulation 8-34-411 report and for all semi-annual increments of MSW Landfill NESHAP report (required pursuant to 40 CFR Part 63.1980(a)) shall be synchronized with the reporting periods and report submittal due dates for the semi-annual MFR Permit monitoring reports that are required by Section I.F of the MFR Permit for this site. A single report may be submitted to satisfy the requirements of Section I.F, Regulation 8-34-411, and 40 CFR Part 63.1980(a), provided that all items required by each applicable reporting requirement are included in the single report.
(Basis: Regulation 8-34-411 and 40 CFR Part 63.1980(a))

ATTACHMENT 2

Final Revisions To Glossary

Excerpts for Section X. Glossary:

HHV

Higher Heating Value. The quantity of heat evolved as determined by a calorimeter where the combustion products are cooled to 60 °F and all water vapor is condensed to liquid.

LFG

Landfill gas

LHV

Lower Heating Value. Similar to the higher heating value (see HHV) except that the water produced by the combustion is not condensed but retained as vapor at 60 °F.

ATTACHMENT 3

Comment Letter from Napa-Vallejo Waste Management Authority

