



EMCON/OWT, Inc.  
2360 Bering Drive  
San Jose, CA 95131-1121  
408.382.5800  
Fax: 408.433.1912

**VIA FAX (415) 749-5030**

December 16, 2004

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

**SUBJECT: Comments on Proposed Title V Modifications  
Kirby Canyon Recycling and Disposal Facility  
Plant Number A1812**

Dear Mr. Hull:

EMCON/OWT, Inc., the Solid Waste Division of Shaw Environmental, Inc., on behalf of Waste Management of California, Inc. (WM), would like to provide comments on the Title V Permit Modifications for the Kirby Canyon Recycling and Disposal Facility (KRCDF) (Plant Number A1812).

WM is requesting that Condition #1437, Part 11 for the Carbon Monoxide (CO) Reasonably Available Control Technology (RACT) Limit of 0.2 pounds per million British thermal units (lbs/MMBtu) be changed to 0.3 lbs/MMBtu (that was originally agreed to in your letter of November 24, 2003 for Application Number 008255).

In addition, WM is requesting that the reporting period be increased from 45 days to 60 days following completion of source test field activities. Source test reports that include hydrocarbon speciation and destruction efficiencies can begin only after receipt of the analytical data from the laboratory. Typically, the laboratory requests up to 30 days to complete their work. Once the source test results are completed, the additional time will allow for necessary time for accurate documentation, and the required internal and client review process that must be completed. To allow sufficient time to prepare accurate and defensible reports, please modify Permit Condition Number 1437, Part 12 to reflect a 60 day response time from the date of the source test.

Thank you for your consideration. If you have any questions, please contact me at (209) 321-1690 or Rich Merrill at (408) 382-5842.

Sincerely,  
EMCON/OWT, Inc.

A handwritten signature in cursive script, appearing to read "Paul Stout". The signature is written in dark ink on a light background.

Paul Stout  
Regional Vice President

Attachment: Letter of November 24, 2003, Hull to Merrill  
Cc: Eddie Pettit – WMI - Kirby Canyon



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

November 24, 2003

EMCON/OWT, Inc.  
2360 Bering Drive  
San Jose, CA 95131-1121

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

Attention: Richard Merrill

Application Number: 008255  
Facility Number: A1812  
Equipment Location:  
*Kirby Canyon Recycling and Disposal  
910 Coyote Creek Golf Drive  
San Jose, CA 95198*

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

Dear Mr. Merrill:

MARIN COUNTY  
Harold C. Brown, Jr.

Per your request, I have changed the Carbon Monoxide (CO) emissions limit for the proposed Enclosed Landfill Gas Flare A-11 from 0.2 pounds per million BTUs of heat input (lb/MMBTU) to 0.3 lb/MMBTU to better accommodate the design capacity of the flare. The District will use the new limit (0.3 lb/MMBTU) as the basis for estimating the potential CO emissions from the Flare A-11. A copy of the modified permit conditions is enclosed.

NAPA COUNTY  
Brad Wagenknecht

SAN FRANCISCO  
COUNTY  
Willie Brown, Jr.  
Chris Daly  
Jake McGoldrick

Please include your application number with any correspondence to the District. If you have any questions, please call me at (415) 749-4919.

Very truly yours,

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

Ted Hull  
Air Quality Engineer II

SANTA CLARA COUNTY  
Liz Kniss  
Patrick Kwok  
Julia Miller  
Dena Mossar

TH:th  
Enclosure

SOLANO COUNTY  
John F. Silva

SONOMA COUNTY  
Tim Smith  
Pamela Torliatt

Jack Broadbent  
EXECUTIVE  
OFFICER/APCO