

December 15, 2005

Ms. Deborah Jordan
Director, Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is issuing a significant revision to the Major Facility Review Permit for Waste Management of Alameda County. (Facility # A2066).

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Plant	Plant Name	Application	Permit Engineer	City	County
A2066	Waste Management of Alameda County	9527	C. Allen	Livermore	Alameda

CONTRA COSTA COUNTY

Mark DeSaulnier
Erling Horn
Mark Ross
Gayle Uilkema
(Secretary)

On October 4, 2005, the District proposed a significant permit revision for this facility. The purpose of this revision is to allow an alternative monitoring procedure that will demonstrate compliance with the Regulation 8-2-301 total carbon limits, which apply to VOC-laden soil handling activities at the S-2 Altamont Landfill. Incorporation of the proposed alternative monitoring procedures requires a permit shield that replaces the Regulation 8-2-601 stack testing procedures with the fugitive emission monitoring procedures identified in Regulation 8-40-604. The District also proposed revisions to Condition # 19235, Part 20, Table VII-A, and Table VIII to describe the new monitoring procedures and clarify the applicable limits. This proposed revision does not result in any emission increases.

MARIN COUNTY

Harold C. Brown, Jr.

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Chris Daly
Jake McGoldrick
Gavin Newsom

The EPA comment period ended on November 20, 2005. The public comment period ended on November 23, 2005. No comments were received from the public or EPA. One comment letter was received on November 21, 2005, from Mr. Paul Stout of Shaw Environmental, Inc., a consultant for the facility. Mr. Stout requested changes to the proposed conditions that would clarify that the limits in Part 20 apply to VOC-laden soil and not to all VOC-laden wastes (which could be incorrectly interpreted to include municipal solid waste). The District agrees to make these requested revisions. Mr. Stout also requested permit revisions that would limit the applicable requirements in Part 20 to soil that is "used as cover material". The District does not agree to include this additional restriction on the applicability of Part 20. Part 20 describes limits and monitoring procedures that will ensure compliance with Regulation 8-2-301. Since Regulation 8-2-301 applies to any VOC-laden soil operation that results in total carbon emissions, and such operations could include aeration that occurs during the storage and handling of soil that is directly disposed in the landfill or that is used for purposes other than cover material, it would not be appropriate to limit the monitoring procedures to only soil that is used as cover material. Therefore, the District is not proposing to include the requested language concerning cover material. The District's responses to these comments are detailed in the attached transmittal letter to the facility.

SAN MATEO COUNTY

Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY

Erin Garner
Liz Kniss
Patrick Kwok
Julia Miller

SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

The District has decided to issue the revised permit incorporating the proposed significant revision with the modifications to Part 20 and Table VIII that are noted in the transmittal letter to the applicant. Enclosed are copies of the final revised permit, the comment letter from Shaw Environmental, Inc., and the transmittal letter to the facility. If you have any questions regarding this permit, please call Steve A Hill, Air Quality Engineering Manager, at: (415) 749-4673.

Sincerely yours,

Jack P. Broadbent
Executive Officer / APCO

Enclosure: Final MFR Permit for Site # A2066
November 21, 2005 Comment Letter from Shaw Environmental, Inc.
Transmittal Letter to the Facility

JPB:BFB:CSA