

COUNTY OF SONOMA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC WORKS
2300 COUNTY CENTER DRIVE, SUITE B-100
SANTA ROSA, CALIFORNIA 95403
David D. Knight, Director



AREA CODE (707)
ROADS 565-2231
TRANSIT 585-7516
REFUSE 565-2231
AIRPORT 565-7243
AIR POLLUTION 433-5911
FAX 565-2620
www.sonomacountypublicworks.com

January 30, 2004

File: 50-01-17.100

Mr. Ted Hull
Permit Services Division
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

VIA FAX (415) 749-5030

RE: Plant Number: A2254
Equipment Location: Sonoma County Central Landfill
500 Mecham Road
Petaluma, CA 94952

Dear Mr. Hull:

Sonoma County (Sonoma) is pleased to provide comments on the Proposed Significant Title V Permit Revision issued for the Sonoma County Central Landfill, Facility Number A2254, on December 19, 2003.

This comment letter is structured in the order that items appear in the permit. Where items appear multiple times in the permit, the comments for each item are described when the item first appears and then are referenced later when it appears again.

Title Page

Sonoma requests that the Mailing Address be changed from 575 Administration Drive, Room 117A, Santa Rosa, California 95403 to 2300 County Center Drive, Suite B-100, Santa Rosa, California 95403.

Sonoma also requests that the Responsible Official be changed from Mr. Edward J. Walker to Mr. David D. Knight, Director, Department of Transportation and Public Works. His Telephone Number is (707) 565-3584. Mr. Alex Sebastian will continue to be the facility contact, however, Sonoma requests that his phone number changed from (707) 792-4961 to (707) 565-7940.

Section I Standard Conditions

Sonoma has no comments on this Section.

Section II Equipment

Table II-A Permitted Sources

S-1 Sonoma County Central Landfill Page 7

The table for S-1 includes a maximum capacity of 32.65 million cubic yards. This design capacity excludes final cover materials, according to Section VI Permit Conditions Condition Number 4044, Part 1. Sonoma requests that the design capacity in the table be annotated as follows: *'Maximum Design Capacity = 32.65 E6 yd³ (24.96 E6 m³) and 19.59 E6 tons **excluding final cover materials**'*.

The table for source S-1 "Sonoma County Central Landfill" lists the maximum waste acceptance rate of 2,500 tons per day.

The daily waste limit is subject to the authority of the Local Enforcement Agency (LEA). The LEA can change the daily waste limit as authorized by Title 14 of the California Code of regulations. For instance in the event of a declared emergency, the LEA can approve both an increase in tonnage and operating hours on a temporary basis. The current Title V permit is not as flexible and would seriously limit our ability to meet the emergency needs of the community.

Therefore, Sonoma requests that the *"Maximum Acceptance Rate equals 2,500 tons per day"* listed in Table II-A S-1 Sonoma County Central Landfill be annotated to state that *"Maximum Acceptance Rate equals 2,500 tons per day **except for temporary situations approved by the Local Enforcement Agency (LEA)**"*.

The table for source S-1 "Landfill Gas Collection System" lists the number of wells at the facility as 50 collectors and 94 wells. Sonoma requests that these numbers be changed to **56** collectors and **112** wells. Sonoma submitted a Start-up Letter on July 26, 2002 indicating that 18 vertical wells were connected to the GCCS pursuant to ATC Application Number 2227. Sonoma further submitted a Startup Letter on November 21, 2003 indicating that 6 collectors were connected to the system in the East Canyon area pursuant to ATC Application Number 7834.

Section III Generally Applicable Requirements

Sonoma has no comments on this Section.

Section IV Source-Specific Applicable Requirements

This section discusses changes Sonoma believes should be made regarding the applicability of BAAQMD Regulations and not source specific conditions. Section VI will further discuss the conditions associated with each source.

Table IV-A S-1 Sonoma County Central Landfill and A-2 Landfill Gas Flare Pages 12 Through 32

Sonoma has no comments on this Section.

Table IV-B S-4, S-5, S-6, S-7, S-9, S-10, S-11, S-12, S-13, S-14 Lean Burn Internal Combustion Engines and Generator Sets Pages 33 Through 40

Regulation 8, Rule 34, Section 501.3 Page 34

Sonoma requests the removal of 8-34-501.3 'Continuous Temperature Records for Enclosed Combustors' and the inclusion of 8-34-501.11 'For Operations Subject to Section 8-34-509, Records of Key Emission Control System Operating Parameters.' Sonoma requests this change because of the corresponding change from 8-34-507 'Continuous Temperature Monitor and Recorder' to 8-34-509 'Key Emission Control System Operating Parameters.'

Section V Schedule of Compliance

Sonoma has no comments on this Section.

Section VI Permit Conditions

Condition No. 4044 S-1 Sonoma County Central Landfill, A-2 Landfill Gas Flare, and A-8 Water Spray

Condition No. 4044 Part 1 Page 57

As stated in Section II, Sonoma requests that Part 1 be annotated to state, '*The amount of municipal solid waste received at the Sonoma County Central Landfill (S-1) shall not exceed 2,500 tons per day nor 897,500 tons per year except for temporary situations approved by the Local Enforcement Agency (LEA).*'

Condition No. 4044 Part 4a Page 58

As described in Section II, Sonoma requests that the number of wells listed be changed to **56** collectors and **112** wells.

Condition No. 4044 Part 4b Page 58

As described in Section II, Sonoma suggests that the number of horizontal collectors be changed from 14 to 8 because 6 collectors have been connected to the GCCS system (as described in the November 21, 2003 Start-up letter submitted for ATC Application Number 7834), with the remaining collectors to be connected as the East Canyon filling progresses.

Condition No. 4044 Part 14 Page 59

Given that numerous parameters are analyzed during the source test, Sonoma requests that the timeframe for submitting the source test report to the Compliance and Enforcement Division be increased to within 60 calendar days of the test date instead of 45 days. This will allow sufficient time for the laboratory to analyze samples, allow for complete and thorough review, and prepare accurate reports.

Condition No. 4044 Part 15 Page 60

This part requires annual landfill gas characterization tests for all compounds listed in EPA AP-42 Table 2.4-1. This test is normally conducted by collecting a gas sample with a Tedlar bag and having it analyzed for fixed gases, reduced sulfur compounds, and organic compounds using ASTM Methods D-1945-81/ASTM D-3588-89, TO-14a/TO-15 and ASTM Method 5504. Sonoma has reviewed this list of compounds and believes that it is inappropriate to test for three of the compounds listed in Table 2.4-1. These compounds are Acetone, Carbon Monoxide, and Mercury. Acetone is not a hazardous air pollutant or photo-chemically reactive and therefore knowing its concentration does not help toxics analysis or precursor organic compound (POC) analysis. Carbon Monoxide is not included in the methods listed above and would require additional analysis methods with substantial costs for limited value because carbon monoxide is not a hazardous air pollutant or POC. Finally, Mercury sampling requires special sampling media and methods in addition to the other methods specified above. The analysis of mercury is much different than the methods outlined above and would add substantial complexity and costs to the annual sampling event. As a result, Sonoma requests that this part include language excluding the requirement to sample for Acetone, Carbon Monoxide, and Mercury.

Condition No. 4044 Part 17p Page 62

Part 17p requires that Sonoma monitor the wind speed on a daily basis; record the date for any days when the wind speed exceeds 15 mph; and keep these records for at least 5 years. Sonoma requests that part 17p be deleted from the permit.

This condition does not require any action when the wind speed exceeds 15 mph nor specify the basis for the condition's existence. Sonoma believes that it is an artifact of a prior permit condition that is no longer applicable.

Condition No. 19933 S-4, S-5, S-6, S-7, S-9, S-10, S-11, S-12, S-13, S-14 Lean Burn Internal Combustion Engines and Generator Sets

Condition No. 19933 Part 8 Page 70

Given that numerous parameters are analyzed during the source test, Sonoma requests that the timeframe for submitting the source test report to the Compliance and

Enforcement Division be increased to within 60 calendar days of the test date instead of 45 days to allow sufficient time for the laboratory to analyze samples and prepare reports.

Section VII Applicable Limits and Compliance Monitoring Requirements

Table VII-A S-1 Landfill Gas Collection System and A-2 Landfill Gas Flare

Table VII-A Temperature of Combustion Zone Page 81

The Monitoring Requirement Citation for this entry refers to SIP 8-34-501.3 as well as 8-34-501.3. The October 1999 version of Rule 8-34 was included in the SIP in August of 2002. Therefore, Sonoma requests that the reference to SIP 8-34-501.3 be deleted from this Table.

Table VII-A Opacity Page 83

The Monitoring type for this entry refers to Temperature Sensor and Recorder (continuous) and the Monitoring Requirement Citation refers to 8-34-501.3, 8-34-507, and Condition 4044 Parts 13 and 17I. These references do not seem to apply to opacity requirements under 6-301. As a result, Sonoma requests they be deleted from the Opacity Entry in Table VII-A.

Table VII-A Amount of Waste Accepted Page 84

As stated in Section II, Sonoma requests that the Emission Limit in Table VII-A be annotated to state, ' $\leq 2,500$ tons/day **except for temporary situations approved by the Local Enforcement Agency (LEA).**'

Table VII-B S-1 S-4, S-5, S-6, S-7, S-9, S-10, S-11, S-12, S-13, S-14 Lean Burn Internal Combustion Engines and Generator Sets

Sonoma has no comments on this Section.

Section VIII Test Methods

BAAQMD Condition No. 4044 Part 6 Page 109

As stated in Section VI, Condition No. 4044 Part 15, Sonoma requests that this part include language excluding the requirement to sample for Acetone, Carbon Monoxide, and Mercury. Therefore, Sonoma requests that the language for Acceptable Test Methods be annotated to include '*GC Analysis for all compounds listed in AP-42 Chapter 2.4 except Acetone, Carbon Monoxide, and Mercury.*'

Section IX Revision History

Sonoma has no comments on this Section.

Section X Glossary

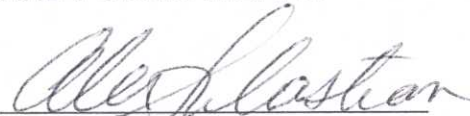
Sonoma has no comments on this Section.

Sonoma again appreciates the opportunity to provide comments on the Proposed Significant Title V Permit Revision for the Sonoma County Central Landfill.

If you have any questions regarding our comments, please do not hesitate to contact me at 707-565-7940

Respectfully submitted,

DAVID D. KNIGHT, DIRECTOR
DEPARTMENT OF TRANSPORTATION
AND PUBLIC WORKS



Alex Sebastian
Senior Civil Engineer

c: David Knight
Ken Wells
Don Poindexter
Keith Foszcz
Jim Arcady