



Shaw Environmental & Infrastructure, Inc.

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November 21, 2005

Carol Allen, P.E.  
Senior Air Quality Engineer  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

**RE: Draft Title V Comment Letter and Revision to Permit Application No. 9527  
Altamont Landfill and Resource Recovery Facility  
10840 Altamont Pass Road  
Livermore, CA 94550  
Facility Number A2066**

Dear Ms. Allen

Shaw Environmental, Inc. (Shaw), on behalf of Waste Management of Alameda, Inc. (WMAC), is pleased to submit comments on the Proposed Major Facility Review Permit (Permit Number A2066) for the Altamont Landfill and Resource Recovery Facility (ALRRF) in Livermore, California. WMAC is requesting a modification to proposed language in Title V Condition No. 19235 Part 20 in which conditions are imposed on the acceptance of VOC laden soils. WMAC is also submitting the attached application for an administrative amendment to the Permit to Operate.

On March 25, 2004, EMCON/OWT, Inc. (now Shaw) submitted an application to the Bay Area Air Quality Management District (BAAQMD) on behalf of WMAC to revise Title V Permit Condition No. 19235 Part 20. In response to the application, the BAAQMD issued Permit to Operate Application Number 9527 on July 20, 2005 and Proposed Significant Revision to ALRRF's Major Facility Review (Title V) Permit on October 4, 2005. Although the Permit to Operate and proposed Title V permit revisions were issued in response to Permit Application No. 9527 submitted in March 2004, the revised permit condition imposes additional requirements that were not included in the permit application.

Title V Condition No. 19235 Part 20 limited emissions from VOC laden soil to 15 pounds of potential carbon emissions per day. The condition was intended to allow the use of soil with low concentrations of organic compounds (less than 50 parts per million by weight [ppmw]) as daily cover. The condition was considered necessary by the BAAQMD since daily cover would be exposed so VOC present

in the soil could potentially volatilize directly to the atmosphere. To comply with the condition, WMAC recorded the amount of soil accepted as daily cover and the concentration of organic compounds in the soil. The March 24, 2004 application for a permit revision was submitted to request the elimination the 15 pound per day limitation and allow an alternative method of screening soil to ensure that contaminated soil was not used as daily cover.

The revised permit condition imposed by the BAAQMD included an alternative monitoring provision as requested but expanded the condition to apply to the acceptance of "other VOC-laden wastes" in addition to VOC-laden soil. The effect of this change is to require VOC screening for all materials brought to the landfill for disposal or daily cover rather than just screening of VOC-laden soils. As defined in the proposed condition, nearly all municipal solid waste would be considered VOC-laden waste since there is no minimum threshold of VOC concentration specified. VOC-laden soils represent only a small fraction of the total material accepted by the ALRRF. Expanding the VOC screening provisions to other VOC-laden wastes represents an apparently unintentional expansion of the permit condition that would impose a significant burden on the landfill operator.

To eliminate VOC-laden wastes from the condition, WMAC proposes the following modifications to Condition No. 19235 Part 20:

20. This Part applies to the acceptance, handling, storage, and on-site reuse of VOC-laden soil ~~and other VOC-laden wastes~~. ~~VOC-laden soil and VOC-laden wastes are~~ **is any material soil used as cover material** that contains volatile organic compounds, as defined in Regulation 8-40-213, other than contaminated soil. As defined in Regulation 8-40-205, contaminated soil contains more than 50 ppmw of VOC or has a surface concentration greater than 50 ppmv of VOC as C1, and contaminated soil is subject to Part 21 below instead of this part. Material containing only non-volatile hydrocarbons and materials meeting the requirement of Regulation 8-40-113 are not subject to this part.

For each lot of VOC-laden ~~waste~~ **soil** accepted at this site, the Permit Holder shall comply with the limits and monitoring procedures identified in either subpart a or subpart b below to demonstrate compliance with the total carbon limits in Regulation 8-2-301.

- a. Unless the Permit Holder demonstrates compliance with Regulation 8-3-301 in accordance with subpart b below, the Permit Holder shall limit the quantity of VOC laden ~~waste~~ **soil** such that...
- b. Unless the Permit Holder demonstrates compliance with Regulation 8-3-301 in accordance with subpart a above, the Permit Holder shall screen each lot of VOC laden waste accepted per day for VOC surface emissions to show that each lot of VOC laden ~~waste~~ **soil** is not contaminated soil.

- The Permit Holder shall use the testing procedures outlined in Regulation 8-40-604.
- ii. The screening test shall be representative of the entire lot of VOC-laden ~~waste soil~~.
  - iii. The Permit Holder shall maintain records of all testing conducted to satisfy this subpart and shall record the amount of VOC-laden ~~waste soil~~ accepted and the highest surface concentration measured pursuant to this subpart. These records shall...
  - iv. Summarize the daily ~~waste~~ **VOC-laden soil** acceptance rates and the weighted average of the surface concentration records on a monthly basis and for each calendar year.

Additionally, Table VIII – Test Methods should be revised to reflect the modified condition. Specifically, the “Description of Requirement” column for BAAQMD Condition No. 19235, Parts 20 and 21 should be modified as follows:

Testing to Determine if ~~Waste~~ **Cover Material** is Contaminated Soil or VOC Laden ~~Waste Soil~~: VOC Concentration in Soils; OR Surface VOC Concentration

In support of this application for a revision to the Permit to Operate the following Bay Area Air Quality Management District forms are attached:

- Form P-101 B
- Form G

WMAC looks forward to receiving the finalized Title V permit with the requested permit condition modifications. Because this application serves only to clarify the applicability of the condition, WMAC believes that this revision is considered an Administrative Amendment to the Permit to Operate.

If you have any questions regarding our comments, please do not hesitate to contact me at 209-321-1690.

Sincerely,  
Shaw Environmental, Inc.



Paul Stout  
Project Manager

**Cc:**  
Ken Lewis, WMAC ALRRF  
Teresa Dominic, WMAC ALRRF