



NAPA-VALLEJO W-ASTE
MANAGEMENT AUTHORITY

August 7, 2003

Ms. Carol Allen
Bay Area Air Quality Management District 939 Ellis Street
San Francisco, CA 94109
FAX (415) 749-4949

SUBJECT:

**COMMENTS ON DRAFT TITLE V PERMIT, AMERICAN CANYON SANITARY LANDFILL, NAPA,
CALIFORNIA (FACILITY NO. A9183)**

Dear Ms. Allen:

The Napa- Vallejo Waste Management Authority (Authority), the owner of American Canyon Sanitary Landfill (Plant No. A9183), herein provides the following comments on the draft Title V permit for the landfill. This letter was prepared with assistance from SCS Engineers (SCS) for submittal to the Bay Area Air Quality Management District (BAAQMD).

Specific Comments

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Under Section I (Standard Conditions), Section B.1 states that the facility would not be allowed to operate if a complete renewal application were not submitted by the required deadline. The Authority understands that this is a standard provision in all Title V permits; however, we wanted to go on record with our concerns as to how this provision and other similar provisions within Section I actually fit for a landfill. The American Canyon Sanitary Landfill is already closed. The only on-site operations that are currently active are landfill gas (LFG) generation and the LFG collection and control system (GCCS). Obviously, LFG generation cannot be prevented from being in "operation" and certainly the BAAQMD would not want us to discontinue operation of the GCCS just because an application was not submitted on time. It is clear that provisions such as this were written for industrial facilities and do not fit well for landfills, particularly closed ones.

Under Section II (Equipment) of the draft permit, Table IIA limits the number of vertical landfill gas (LFG) extraction wells to 92 and LFG/leachate extraction wells to 35. This same limit is contained within Condition 3 of the permit conditions for the landfill source (S-I). There are 24 new LFG extraction and 33 new LFG/leachate extraction

wells due recent construction. I have asked Gas Recovery Services to verify the number of LFG extraction wells that own and will have that number by Monday, or it can be obtained from their pennit. The draft Title V pemlit should be modified to correct the number ofwells.

1195 **Third** Street. Room 101. Napa, CA94559-3082 707253-4471. FAX707 253.4545
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- 5.

Under Section III (Generally Applicable Requirements) of the draft permit, Table III lists a series of rules that generally apply or could apply to on-site operations. Although we are not asking for any changes to this section of the permit, many of these requirements may never apply to operations at the closed American Canyon Sanitary Landfill. These include: architectural coating, solvent cleaning operations, aeration of contaminated soils, adhesives and sealants, sandblasting, etc.

Condition 2 of the permit conditions for the landfill (S-I) and LFG flare (A-2) seems to indicate that the flare is necessary to provide adequate control ofLFG at he facility. The Authority does not necessarily agree with this contention. LFG generation modeling recently completed for the site (attached) indicates that in 2002 (the first year when the new requirements ofBAAQMD Rule 8-34 took effect), the landfill was likely generating 728 standard cubic feet per minute (scfm) of LFG. When operating, the engines at the Gas Recovery Systems, Inc. (GRS) facility (Plant No. B1671) can control approximately 630 scfm ofLFG or about 87%. This collection efficiency is in the range of efficiencies stated by U.S. EP A to be indicative of a comprehensive LFG system. Therefore, it is our position that adequate LFG collection efficiency can be achieved with only the GRS engines on-line. Clearly, if one or both of the engines are off-line, the flare must be operated. Please note that the majority of the surface emissions exceedances that we have had in the past were due to leakage around well casings (some ofwhich had not even been connected to a vacuum source yet) and other penetrations or cracks in the cover. They were not due to inadequate LFG collection. As such, we would like Condition 3 to be revised to allow operation of the flare and/or engines but that operation ofboth is not necessarily required.

Condition 14 of the permit conditions for the landfill (8-1) and LFG flare (A-2) contains a requirement to lest the LFG for various toxic substances on an annual basis. The Authority has no problem with this requirement; however, the criteria for requesting the removal of individual chemicals from the testing list are a bit unclear. As written, it would appear that we would have to complete some form of risk assessment in order to discontinue this testing or possibly that the District would complete this risk assessment and advise us of the results. The Authority requests that Condition 14 be revised to clarify who would be responsible for conducting the risk assessment.

The Authority proposes that the District consider the use of the Toxic Air Contaminant Trigger Levels under Rule 2-1 (Table 2-1-316) be used as a means to screen out chemicals from future consideration. Also, if the Authority completes a formal risk assessment demonstrating that the site-wide emissions result in risks below the regulated thresholds in the District, we would like to be allowed to discontinue the toxics monitoring completely or to reduce its frequency to every 5 years or some other less frequent period.

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Condition 16 of the permit conditions for the landfill (S-I) and LFG flare (A-3) allows for the synchronizing of the semi-annual Title V reports with the semi-annual Rule 8-34 reports. However, it is unclear whether these reports can be combined into a single report or whether the reports should be kept separate but the reporting periods synchronized. Please clarify this in the final permit.

There are several typos in the Permit Evaluation and Statement and Basis document. In several places, the facility is referred to by different names. The facility should be identified by the name, " American Canyon Sanitary Landfill. " Please correct these typos as necessary.

General Comments

In several places within the Pennit Evaluation and Statement and Basis document, the unresolved compliance status of the facility is mentioned. Also, the creation of anew Compliance Report is also mentioned. The Authority is concerned and confused as to what impact this will have on our Title V pennit.

Over the last several months, we have continually contacted personnel at the District to inquire about setting up a compliance schedule but we have not been successful in this regard. It now appears that a compliance schedule will be necessary to move this permit forward.

Therefore, we hereby request a meeting with BAAQMD staff to discuss and establish a compliance schedule to address our open compliance issues. We also request that the Authority be allowed to review the Compliance Report that is developed by the District before it becomes part of the Title V penning process and is released to the public.

The draft Title V pennit contains the requirement for preparation of a start-up, shutdown and malfunction (SSM) plan as part of the new landfill National Emission Standard for Hazardous Air Pollutants (NESHAPs). The Authority is concerned that this requirement and the typical contents ofan SSM plan would conflict with some of the provisions ofBAAQMD Rule 8-34 as well as the District's breakdown and other rules. We would be looking for some guidance from the BAAQMD as to the contents of such a plan in the District as well as how the plan would or should be implemented.

Please note that any requested changes on the draft permit should also be made in the corresponding section(s)ofthe Statement of Basis document.

The Authority would be glad to discuss any of these issues with you or to meet with you at your convenience. We are hopeful that the compliance issues can be resolved in a reasonable manner, which would allow for development ofa

compliance schedule and issuance of the Title V permit.

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If you have any additional questions or concerns, please contact the undersigned at (707) 253-4410. Thank you in advance for your prompt review of our concerns regarding the proposed Title V permit. We await your responses to our comments and appreciate you giving them careful consideration.

Sincerely,



Jill PaW, R.E.H.S. Authority Secretary

Attachment

cc:

Pat Sullivan, SCS Engineers Trent Cave; Authority Manager

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Year	Disposal Rate (tons/yr)	Refuse In-Place (tons)	Disposal Rate (Mg/yr)	Refuse In-Place (Mg)	Methane Generation Rates (m ³ /yr)	LFG Generation Rates (cfm)	NMOC Generation Rates (tons/yr)	NMOC Generation Rates (Mg/yr)
1970	150,000	0	136,078	0	0.000E+00	0	0	0
1971	150,000	150,000	136,078	136,078	2.722E+05	37	1	1
1972	150,000	300,000	136,078	272,155	5.389E+05	72	2	2
1973	150,000	450,000	136,078	408,233	8.004E+05	108	3	2
1974	150,000	600,000	136,078	544,311	1.057E+06	142	4	3
1975	150,000	750,000	136,078	680,389	1.308E+06	178	4	4
1976	150,000	900,000	136,078	816,468	1.554E+06	209	5	5
1977	150,000	1,050,000	136,078	952,544	1.796E+06	241	6	6
1978	150,000	1,200,000	136,078	1,088,622	2.032E+06	273	7	6
1979	150,000	1,350,000	136,078	1,224,699	2.264E+06	304	8	7
1980	150,000	1,500,000	136,078	1,360,777	2.491E+06	335	8	8
1981	150,000	1,650,000	136,078	1,496,855	2.714E+06	365	9	8
1982	150,000	1,800,000	136,078	1,632,933	2.933E+06	394	10	9
1983	150,000	1,950,000	136,078	1,769,010	3.147E+06	423	11	10
1984	150,000	2,100,000	136,078	1,905,088	3.357E+06	451	11	10
1985	150,000	2,250,000	136,078	2,041,166	3.562E+06	479	12	11
1986	150,000	2,400,000	136,078	2,177,243	3.764E+06	506	13	12
1987	203,600	2,550,000	184,703	2,313,321	3.962E+06	532	14	12
1988	203,600	2,703,600	184,703	2,449,399	4.252E+06	571	15	13
1989	203,600	2,857,200	184,703	2,585,477	4.538E+06	610	16	14
1990	203,600	3,010,800	184,703	2,721,555	4.817E+06	647	16	15
1991	193,200	3,164,400	175,268	2,857,633	5.091E+06	684	17	16
1992	190,500	3,318,000	172,819	2,993,711	5.341E+06	718	18	17
1993	184,000	3,471,600	148,778	3,129,789	5.581E+06	750	19	17
1994	162,300	3,625,200	147,236	3,265,867	5.788E+06	775	20	18
1995	154,800	3,778,800	140,432	3,401,945	5.948E+06	799	20	18
1996	0	4,229,200	0	3,836,666	6.111E+06	821	21	19
1997	0	4,229,200	0	3,836,666	5.990E+06	805	20	19
1998	0	4,229,200	0	3,836,666	5.872E+06	789	20	18
1999	0	4,229,200	0	3,836,666	5.755E+06	773	20	18
2000	0	4,229,200	0	3,836,666	5.641E+06	758	19	18
2001	0	4,229,200	0	3,836,666	5.530E+06	743	19	17
2002	0	4,229,200	0	3,836,666	5.420E+06	728	19	17
2003	0	4,229,200	0	3,836,666	5.313E+06	714	18	16
2004	0	4,229,200	0	3,836,666	5.208E+06	700	18	16
2005	0	4,229,200	0	3,836,666	5.105E+06	686	17	16
2006	0	4,229,200	0	3,836,666	5.003E+06	672	17	16
2007	0	4,229,200	0	3,836,666	4.904E+06	659	17	15
2008	0	4,229,200	0	3,836,666	4.807E+06	646	16	15
2009	0	4,229,200	0	3,836,666	4.712E+06	633	16	15
2010	0	4,229,200	0	3,836,666	4.619E+06	621	16	14
2011	0	4,229,200	0	3,836,666	4.527E+06	606	15	14
2012	0	4,229,200	0	3,836,666	4.438E+06	596	15	14
2013	0	4,229,200	0	3,836,666	4.350E+06	585	15	14
2014	0	4,229,200	0	3,836,666	4.264E+06	573	15	13
2015	0	4,229,200	0	3,836,666	4.179E+06	562	14	13
2016	0	4,229,200	0	3,836,666	4.095E+06	550	14	13
2017	0	4,229,200	0	3,836,666	4.015E+06	540	14	12
2018	0	4,229,200	0	3,836,666	3.936E+06	529	13	12
2019	0	4,229,200	0	3,836,666	3.856E+06	518	13	12
2020	0	4,229,200	0	3,836,666	3.782E+06	508	13	12
2021	0	4,229,200	0	3,836,666	3.707E+06	498	13	12
2022	0	4,229,200	0	3,836,666	3.633E+06	488	12	11
2023	0	4,229,200	0	3,836,666	3.561E+06	479	12	11
2024	0	4,229,200	0	3,836,666	3.491E+06	469	12	11
2025	0	4,229,200	0	3,836,666	3.422E+06	460	12	11
2026	0	4,229,200	0	3,836,666	3.354E+06	451	11	10

2024	0	4,229,200	0	3,836,666	3.491E+06	469	12	11
2025	0	4,229,200	0	3,836,666	3.422E+06	460	12	11
2026	0	4,229,200	0	3,836,666	3.354E+06	451	11	10
2027	0	4,229,200	0	3,836,666	3.286E+06	442	11	10
2028	0	4,229,200	0	3,836,666	3.222E+06	433	11	10
2029	0	4,229,200	0	3,836,666	3.159E+06	424	11	10
2030	0	4,229,200	0	3,836,666	3.096E+06	416	11	10

MATED NMOC CONCENTRA
 ASSUMED METHANE CONTENT
 SELECTED DECAY RATE CONST
 SELECTED ULTIMATE METHANE
 METRIC FORMULA #

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