



WASTE MANAGEMENT

November 14, 2003

**GUADALUPE RUBBISH DISPOSAL CO.. INC.** P.O. Box 20957  
San Jose, CA 95160  
(408) 268-1670  
(408) 268-7451 Fax

Ted Hull  
Air Quality Engineer  
Bay Area Air Quality Management District 939 Ellis Street  
San Francisco, CA 94109

RE:

Comment Letter on Proposed Minor Revisions to the Title V Permit Facility Number: A3294  
Facility Location: Guadalupe Rubbish Disposal Company  
15999 Guadalupe Mines Road  
San Jose, CA 95120

Dear Mr. **Hull**

Guadalupe Rubbish Disposal Company, Inc. (GRDC) is pleased to provide comments on the GRDC Facility (Plant Number A3294) Proposed Minor Revisions to the Major Facility Review Title V Permit. The Proposed Minor revisions were issued on September 30, 2003. The existing GRDC Title V Permit was issued by the Bay Area Air Quality Management District (BAAQMD) in October 2001.

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

Section I. Standard Conditions

GRDC is required to submit its annual compliance report, as required by Regulation 8, Rule 34, Section 411. GRDC will also be required to submit Semi-Annual reports for compliance with National Emission Standards for Hazardous Air Pollutants (NESHAP): Municipal Solid Waste Landfills (40 CFR Part 63 Subpart AMA). These reports contain most of the same information that will be required for the two Title V Semi-annual reports required by Section I.F. GRDC requests that the timing of the two Title V Semi- Annual reports be synchronized to eliminate the need for duplicate submittal of overlapping reports for the 8-34 Annual report and NESHAP Subpart AAAA semi- Annual reports.

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Section II. Equipment

Table II-A Permitted Sources

**5-3 Woodchipper/Tubgrinder Page 7**

Source S-3 is no longer located at GRDC. GRDC surrendered that Permit to Operate (PTO) on November 11' 2003 (See Attachment A- November 11, 2003 Permit Surrender Letter). GRDC requests that this equipment be removed from the Title V permit.

**5.9 Guadalupe Landfill Page 7**

The table for source 8-9 "Guadalupe Landfill" lists the Maximum Waste Acceptance Rate of 3,650 tons per day (tons/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 (CCR). 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, GRDC requests that the '*Maximum Waste Acceptance Rate equals 3,650 tons/day*' listed in Table II-A S-9 be annotated to state that '*Maximum Waste Acceptance Rate equals 3,650 tons/day except for temporary situations approved by the Local Enforcement Agency (LEA)*'.

**5-11 Trammel Screen Page 7**

The table for source S- Powered.

"Trommel Screen" lists the make or type as Royer, Electric

The Trommel Screen is actually powered by two (2) Deutz Model F4L912, 51.4 horsepower diesel engines. GRDC requests that the '*Royer, Electric Powered*' listed in Table II-A S-11 be changed to state '*Royer, Diesel Powered*', GRDC submitted an Application for PTOs for these engines that *were* subject to Loss of Exemption on March 28, 2003. GRDC paid the fee invoice number ONP51 in the amount of \$278.00 for these engines on July 10' 2003 (See Attachment B - Deutz Engine Permit Application, Invoice, and Receipt).

In addition, GRDC per the previously submitted permit application requests that the two Deutz diesel engines be added as Permitted Sources. GRDC has designated these Sources as S-21 and S-22 for the purposes of this letter.

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**5-17 Diesel Fired Internal Combustion Engine (for 5.3 Tubgrinder) Page 7**

Source S-17 is no longer located at GROG. GROG surrendered the S-17 PTO on November 11' 2003 (See Attachment A -November 11'

**2003 Permit Surrender Letter). GROC requests that this equipment be removed from the Title V permit.**

**5-18 Materials Recovery Operation -Debris Sorting System Page 7**

The table for source S-18 Materials Recovery Operation -Debris Sorting System lists the capacity as 280 tons/day. GRDC requests that the S-18 capacity be changed from 280 tons per day to 600 tons per day. GRDC believes it requested 600 tons per day during permitting of S-18. Permit Condition Number 18258 on Page 47 does not include this capacity or record keeping requirements.

**5-21 and 5-22 Diesel Fired Internal Combustion Engines Page 7**

As stated in the Section for 'S-11 Trommel Screen Page 7', GRDC requests that the two (2) Deutz, Model F4L912, 51.4 horsepower engines which power the 8-11 Royer Trommel Screen be included as Permitted Sources in the Title V permit.

Table 11-8 Permitted Sources

**A-3 Water Spray System Page 7**

Source A-3 is the Water Spray System that was used to control S-3 emissions. S-3 is no longer located at GROG, and A-3 is no longer in operation. GROG surrendered S-3 and A-3 PTO on November 11 I 2003 (See Attachment A- November 11 I 2003 Permit Surrender Letter). GROC requests that this equipment be removed from the Title V permit.

Section III. Generally Applicable Requirements

GRDC has no comments on this Section

**Section IV. Source-Specific Applicable ReQuirements**

This section discusses changes GRDC 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-3: Wood Chipper/Tub Grinder and A-3: Water Spray System Pages 12 and 13

As stated in Section II, GRDC requests that S-3 and A-3 be deleted from the permit.

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Table IV-D 5-9: Landfill with Gas Collection System, A-9 Landfill Gas Flare Regulation 8, Rule 2-301 Page 15

GRDC requests BMQMD Regulation 8, Rule 2 be removed from Table IV-D on page 15. See Section VI Condition No.6188 Part 19 below (from pages 39 and 40).

This request is to provide consistency throughout the Proposed Permit with the Permit Shield requested in Section XI. The Permit Shield states that compliance with Regulation 8, Rule 40 for low Volatile Organic Compounds (VOC) content soil (i.e. less than 50 parts per million (ppm) by weight) subsumes compliance with Regulation 8, Rule 2. Thus, compliance

with Regulation 8, Rule 2 is no longer necessary.

**Regulation 8j Rule 34-301.4 Page 16**

8MQMO Regulation 8, Rule 34, Section 301.4 (Limits for Other Emission Control Systems) on page 16 refers to Facility Number 81669. Facility 81669 is managed by Gas Recovery Systems, Inc. (GRS), and is not under the control of GROG. GRS holds responsibility for and is required to comply with Limits for Other Emission Control Systems, Section 8-34-301.4. Since the GRS Title V Facility Number 81669 requires compliance with 8-34-301.4, GROG requests that Section 8-34-301.4 be removed from Table IV-O.

Table IV-F 5-17: Diesel'.C. Engine for Tub Grinder Pages 31 and 32

As stated in Section II S-17, GRDC requests that S-17 be deleted from the permit.

Section V. Schedule of Complian~

GRDC has no comments on this Section.

Section VI Permit Conditions

Condition No.6188 for 5-9: Landfill with Gas Collection System Part 1.a Page 35

As stated in Section II S-9, GRDC requests that the *'Total waste accepted and placed at the landfill shall not exceed 3, 650 tons in any day'* listed in S-9 Condition 6188 part 1.a be annotated to state that *'Total waste accepted and placed at the landfill shall not exceed 3,650 tons in any day except for temporary situations approved by the Local Enforcement Agency (LEA).'*

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**Condition No.6188 for 8-9: Landfill with Gas Collection System Part 2 Page 35**

Part 2 lists the number of wells at the site as well as the number wells for which an A TC has been issued. The total listed is 51 vertical collection wells and 10 trench collectors.

GRDC requests that the Title V Permit reflect the actual number of 47 vertical gas wells, 9 trench collectors, at the site. This total represents the latest well counts after implementation of ATC application numbers 6262 and 8118, and decommissioning of wells pursuant to Request for Well Redundancy letters.

GRDC also requests that the Title V Permit acknowledge that the number of wells will change in the future in accordance with applicable regulatory requirements and BAAQMD approvals. GRDC requests that the Title V Permit language on this aspect be written in such a manner that it acknowledges that approved well additions, replacements, and/or abandonments per the Gas Collection and Control Plan can be made without modification or re-issuance of the Title V Permit.

Condition No.6188 for 5-9: Landfill with Gas Collection System Part 14, A-9: Landfill Gas Flare Pages 38 and 39

Part 14 requires annual source testing of the A-9 Landfill Gas Flare. Given that numerous parameters are analyzed during the source test, GRDC requests that the source test report shall be submitted to the Compliance and Enforcement Division within 60 days of the test date to allow sufficient time for the laboratory to analyze samples and prepare reports.

Condition No.6188 for 5-9: Landfill with Gas Collection System Part 19 Pages 39 and 40

Part 19 states that emissions from soils with low levels of VOC contamination are limited to less than 15 pounds per day. A review of the Title V basis statement for this condition showed that the 15 pounds per day limit was based on Regulation 8, Rule 2 *Miscellaneous Operations*. Section 8-2-301 states that: *A person shall not discharge into the atmosphere from any miscellaneous operation an emission containing more than 6.8 kg (15 lbs.) per day and containing a concentration of more than 300 PPM total carbon on a dry basis.* The basis statement indicated that the 300 PPM limit was not appropriate for this operation, but the 15 pounds per day limit was. GRDC believes upon review of Section 8-2-301 that the 15-pound per day limit is only applicable to emission streams where the VOC concentration as carbon is greater than 300 ppm because of the word "and" in the section. Thus, the 15-pound per day limitation of emissions is not applicable to emission streams where the VOC concentration as carbon is less than 300 PPM. As a result, GRDC requests that Part 19 be deleted because surface VOC concentrations above soil contaminated with low levels of VOC with less than 50 ppm by weight, are not expected to approach 300 ppm as total carbon. To allow for this deletion, GRDC requests that the Permit Shield shown below in Section IX be added to the Title V Permit.

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Condition No.6385 for 5-3: Woodchipper/Tubgrinder Page 44 and 45

As stated in Section II, GRDC requests that S-3 be deleted from the permit.

Condition No.16830 for 5-17: Tub Grinder Diesell.C. Engine Page 47

As stated in Section II, GRDC requests that S-17 be deleted from the permit.

Condition No.20516 Part 5 for 8-20: DiesellC Engine for Dirt Screen Page 49

Part 5 requires annual source testing of the 8-20 DiesellC Engine emissions for NOx and PM. GRDC requests that the source test report shall be submitted to the Compliance and Enforcement Division within 60 days of the test date to allow sufficient time for the laboratory to analyze samples and prepare reports.

Section VII. Applicable Limits and Compliance Monitorina ReQuirement

Table Vil-A 5-3: Wood Chipper/Trub Grinder and A-3: Water Spray System Page 50

As stated in Section II, GRDC requests that S-3 and A-3 be deleted from the permit.

**Table VII-D A-9: Landfill Gas Flare -Gas Flow Page 54**

The A-9 Landfill Gas Flare does not have a Bypass Valve. The Table VII-D Section regarding Gas Flow states that for Monitoring Gas Flow: *Gas Flow Meter and Recorder (every 15 minutes) or Monthly Inspection of Bypass Valve and Lock and Records*. GRDC requests that *Monthly Inspection of Bypass Valve and Lock and Records* be deleted from this Section. This Section should read as follows: 'Gas Flow Meter and Recorder (every 15 minutes) 9f .A.49.~f.~!j' 1.~sfJeGti9.~ 9'£ Bj'pass ~/:./~'~ a.~G &9G!'; a.~G .O.eG9rd\$. ,

Table VII-D Total Carbon Emissions Page 59

As stated in Section IV-D, S-9 Landfill with Gas Collection System and A-9 Landfill Gas Flare, GRDC requests that BMQMD Regulation 8, Rule 2-301 be removed from Table VII-D on page 59. This request is to provide consistency throughout the Proposed Permit with the Permit Shield in Section IX. The Permit Shield states that compliance with Regulation 8, Rule 40 for low VOC content soil (i.e. less than 50 ppm by weight) subsumes compliance with Regulation 8, Rule 2. Thus, compliance with the 15-pound limitation in Regulation 8, Rule 2 is no longer necessary.

Table VII-D 5-17: Diesell.C. Engine for Tub Grinder Page 65

As stated in Section II, GRDC requests that S-17 be deleted from the permit.

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VIII Test Methods

BAAQMD Condition No.6188 P'art 19 Page 71

As stated in Section 'Condition No.6188 for 8-9: Landfill with Gas Collection System Part 19 Pages 39 and 40' requested the deletion of Part 19. As a result, the test method listed for Part 19 is no longer necessary and GRDC requests that it be deleted from Table VIII.

IX Permit Shield

As stated in Section IV, Table IV-D S-9: Landfill with Gas Collection System Regulation 8, Rule 2-301 Page 15, GRDC requests that this condition be removed and the following Permit Shield be added to the Title V Permit. The Permit Shield states that compliance with Regulation 8, Rule 40 for low VOC content soil (i.e. less than 50 ppm by weight) subsumes compliance with Regulation 8, Rule 2. Thus, compliance with Regulation 8, Rule 2 is no longer necessary.

*SUBSUMED REQUIREMENTS*

*Pursuant to BAAQMO Regulations 2-6-233.2 and 2-6-409.12, as of the date this permit is issued, the federally enforceable monitoring, recordkeeping, and reporting requirements cited in the following table for the source or group of sources identified at the top of the table are subsumed by the monitoring, recordkeeping, and reporting for more stringent requirements or by a "hybrid" monitoring scheme. The BAA QMO has determined that compliance with the requirements*

listed below and elsewhere in this permit will assure compliance with the substantive requirements of the subsumed monitoring requirements. Enforcement actions and litigation may not be initiated against the source or group of sources covered by this shield based on the subsumed monitoring requirements cited:

**Table IX-A**  
**5-9 ACTIVE LANDFILL**

<b>Subsumed Requirement Citation</b>	<b>Title or Description</b>	<b>Streamlined Requirements</b>	<b>Title or Description</b>
<b>8-2-601</b>	<b>Determination of Compliance (for organic compound emissions as total carbon)</b>	<b>8-40-604</b>	<b>Measurement of Organic concentration (to classify soil as "contaminated" or "not contaminated")</b>

The Regulation 8, Rule 2 total carbon test procedure is subsumed by the Regulation 8, Rule 40 VOC test procedure for the Active Landfill (8-9) because testing performed pursuant to Regulation 8-40-604 will rule out the need to test in accordance with Regulation 8-2-601.

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Regulation 8, Rule 2 "Miscellaneous Operations" is only applicable to sources of precursor organic compounds that are not otherwise limited by Regulation 8 or Regulation 10 rules. In the case of the Landfill S-9, Regulation 8, Rule 2 would apply only to cover soil that contains some VOC, but is not defined as "contaminated soil" by Regulation 8-40-205. Soil which has an organic content exceeding 50 ppmw or that registers an organic concentration greater than 50 ppmv (expressed as methane, C1) is subject to Regulation 8, Rule 40.

Regulation 8-2-301 limits organic compound emissions (expressed as total carbon) from an operation to 15 pounds per day, if the emission from the operation has an organic compound concentration greater than 300 ppmv (expressed as total carbon, dry basis). Since soil found not to be contaminated using the procedures of Regulation 8-40-604 will have a surface VOC concentration of less than 50 ppmv (expressed as methane, C1) it can reasonably be assumed that the concentration is also less than 300 ppmv (total carbon, dry basis) as determined by the procedures of Regulation 8-2-601. Since the operation complies with the 300 ppmv limit, it complies with Regulation 8-2-301.

In summary, measurements conducted under Regulation 8-40-604 that show surface VOC concentrations less than 50 ppmv (expressed as methane, C1) are conclusive to demonstrate compliance with Regulation 8-2-301.

X Glossary

GRDC has no comments on this Section.

XI Applicable State Implementation Plan

GRDC has no comments on this Section.

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Summary

GRDC appreciates the opportunity to provide comments on the Proposed Minor Revisions to the Major Facility Review Title V Permit at the Guadalupe Rubbish Disposal Company Facility.

If you have any questions regarding our comments, please do not hesitate to contact me at 408-268-1670.

Sincerely,

**Guadalupe Rubbish Disposal Company, Inc.**



**Paul Michael**  
**District Manager**

Attachments:

**Attachment A -November 11, 2003 Permit Surrender Letter Attachment B -Deutz Engine Permit Application, Invoice, and Receipt**

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