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NAPA-VALLEJO WASTE
MANAGEMENT AUTHORITY

YJA FAX (415)749-5030

December 3, 2003

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

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 pennit for the landfill. This letter was prepared with assistance from scs Engineers (SCS) for submittal to the Bay Area Air Quality Management District (BAAQMD).

Condition No.12418 S-1 American Canyon Sanitary Landfill and A-2 Landfill Gas Flare

Part 13 Page 24:

Given that numerous parameters are analyzed during the source test, the Authority requests that the source test report shall be submitted to the Compliance and Enforcement Division within 60 days of the test date instead of 45 days to allow sufficient time for the laboratory to analyze samples and prepare reports.

Part 14 Page 24:

For the reasons stated above, the Authority requests that the Landfill Gas Characterization report shall be submitted to the Compliance and Enforcement Division within 60 days of the test date instead of 45 days of the test date to allow sufficient time for the Laboratory to analyze samples and prepare reports.

Part 16 Page 26

Condition 16 of the permit conditions for the landfill (8.1) 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, on January 16, 2004, a new requirement will take affect that requires additional semi- annual reporting. The landfill Maximwn Achievable Control Technology (MACT) standard (40

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CFR Part 63, Subpart AAM) requires the submittal of semi-annual reports detailing the implementation of the start-up, shutdown, and malfunction (SSM) plan, which is also required by the MACT. The Authority would like Condition 16 to be revised to clarify that the semi-annual SSM report should be submitted on the same schedule as the other two semi-annual reports and can be combined into one report. We had envisioned that the semi-annual SSM report could be an additional section or attachment to the Rule 8-34 reports.

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 pennit. We await your responses to our comments and appreciate you giving them careful consideration.

Sincerely,



Jill Pahl
Napa-Vallejo Waste Management Authority

Attachment

cc:

Pat Sullivan, SCS Engineers
Christian Colline, Emcon OWI' Trent Cave; Authority Director Robert Paul, Authority Counsel

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