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July 17, 2003

## Republic Services Vasco Road Landfill

Mr. Hon Man  
Bay Area Air Quality Management District 939 Ellis Street  
San Francisco, CA 94109  
FAX (415) 749-4949

SUBJECT:

**COMMENTS ON DRAFT TITLE V PERMIT, V ASCO ROAD LANDFILL, LIVERMORE, CALIFORNIA (FACILITY NO. ASO9S)**

Dear Mr. Man:

Republic Services Vasco Road Landfill (Republic), the owner/operator of Vasco Road Landfill (Plant No. ASO9S) 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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On the cover page of the Title V permit, please change the zip code on the facility address to the 94551. Please change the mailing address to the following:

P.O. Box 2125  
Livermore, CA 94551-2125

This change should also be made on the cover page for the Permit Evaluation and Statement and Basis document.

Under Section II (Equipment) of the draft permit, Table IIA lists the design capacity of the landfill as 31.65 million cubic yards and 23.8 million tons. These same capacity limits are contained within Condition 14 of the permit conditions for the landfill source (S-I). While these capacity limits are consistent with the landfill's solid waste facility permit (SWFP), they are predicated on an in-place waste density of approximately 1504 lb/cubic foot. Current landfill practices are capable of achieving higher waste densities, which would result in additional refuse tonnages being placed within the same air space or volume limit. As such, Republic hereby requests that the Title V permit reflect the fact that the current tonnage limit is based on an assumed density that may change over time and that the facility can exceed the tonnage limit without necessitating a modification to the Title V permit as long as the volume limit is not exceeded.

**400 I North Vasco Road. Livermore, CA 94550  
925-447-0491 .Fax: 925-447-0499**

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Under Section II (Equipment) of the draft permit, Table IIA limits the number of vertical landfill gas (LFG) extraction wells to 83 and horizontal collectors to 5. This same limit is contained within Condition 2 of the permit conditions for the landfill source (S-I), with an allowance for 20 additional vertical wells to be installed in the future. Republic recently submitted the first addendum to the LFG collection and control system (GCCS) Design Plan for the site (letter dated, May 9,2003). This addendum to the GCCS Design Plan, which is an open application with the District, requested the addition of 46 additional wells ( either vertical or horizontal) at the site. As such, Republic requests that the allowance for installation of these additional 46 wells be included in the Title V permit.

**Under Section II (Equipment) of the draft pennit, Table IIB lists the minimum temperature of the on-site LFG flare as 1400° F. This is inconsistent with Condition 5 of the pennit conditions for the abatement device source (A-3). These should be corrected.**

Condition I of the permit conditions for the landfill (S-I) and LFG flare (A-3) specifies that all collected LFG should be routed to the flare except during specified periods when certain exemptions may apply, such as for inadvertent component or surface leaks that do not exceed 1000 parts per million by volume (ppmv) or 500 ppmv, respectively. This condition could be interpreted to mean that any component leaks or surface emissions above the limits specified in Rule 8-34-301.2 and 303 would be a violation of Condition 1. This is inconsistent with the rule itself, which allows component or surface leaks in excess of the standards to be corrected and remonitored on a certain schedule, such that they would not become violations. Republic requests that Condition 1 be reworded to make it clear that component and surface leaks above the Rule 8-34 thresholds would not become violations of Condition 1 if they can be corrected and remonitored as required by the rule.

Condition 7 of the permit conditions for the landfill (S-I) and LFG flare (A-3) specifies that the flare can only be fired on LFG "exclusively." As written, this condition would not allow the use if propane as a start-up fuel. Please revise this condition to allow the use of propane for flare start-up.

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Condition 13 of the permit conditions for the landfill (S-I) and LFG flare (A-3) specifies BTU throughput limits on the

flare. These limits seem inconsistent with the actual capacity of the flare. The on-site flare is rated for 2600 standard cubic feet per minute (scfm) @ 50% methane. Using the District's factor of 1013 BTU/scf of methane, this would equate to BTU throughput limits of 1896 million BTU/day and 692,163 million BTU/year. These values are inconsistent with the ones currently listed in the draft Title V permit. Therefore, Republic requests that the BTU throughput limits listed in the permit be revised to be consistent with the values set forth above, which are based on the actual capacity of the equipment operating on-site.

Condition 14 of the permit conditions for the landfill (S-1) and LFG flare (A-3) specifies a daily limit for refuse tonnage at the landfill based on the amount that can be "accepted and placed." Republic is concerned that the terms used to define this operation are inconsistent with the site's SWFP and the California Public Resources Code (PRC). Republic proposes that these terms be replaced by the following: "disposed as defined by the California Public Resources Code." In addition, we also suggest that a definition for "disposed" based on the PRC be provided in Section X (Glossary).

Condition 15 of the permit conditions for the landfill (S-1) and LFG flare ( A -3 ) indicates that the facility is not subject to Rule 8-40 because it does not accept contaminated soil with a volatile organic compound (VOC) content of greater than 50 parts per million by weight (ppmw). This is not correct. The Vasco Road Landfill is authorized to accept certain VOC-laden material, which could have levels above 50 ppmw. As such, Rule 8-40 should be listed as being applicable, and all the various conditions relative to Rule 8-40 should be included in the Title V permit (as we have seen for other landfill Title V permits in the District). This may also necessitate changes to other portions of the Title V permit, including the Permit Evaluation and Statement and Basis document.

Condition 20 of the permit conditions for the landfill (S-1) and LFG flare (A-3) requires annual source testing of the flare for various pollutants, including sulfur dioxide (SO<sub>x</sub>). Condition 21 requires annual LFG testing for all sulfur compounds listed in U. S. EPA's AP-42 document. These requirements seem redundant since they will both demonstrate compliance with the sulfur limits contained with the permit. As such, Republic requests that the SO<sub>x</sub> (exhaust) source testing requirement be removed from the Title V permit in lieu of the sulfur testing requirement in Condition 21, which could be used to determine the sulfur concentration in the raw LFG as well as the SO<sub>x</sub> emissions from the flare.

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Condition 21 of the permit conditions for the landfill (S-1) and LFG flare (A-3) contains a requirement to test the LFG for various toxic substances on an annual basis. Republic 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. Republic requests that Condition 21 be revised to clarify who would be responsible for conducting the risk assessment.

Republic 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 Republic 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 year or some other less frequent period.

Condition 22 of the permit conditions for the landfill (S-1) and LFG flare ( A -3 ) contains provisions for various

recordkeeping requirements. Condition 22.d

seems particularly onerous since it requires the landfill to keep records of dates, locations, and frequency per day of all watering on unpaved roads and all cleaning activities on paved roads. This is simply not feasible based on the nature of these activities. As an alternative, Republic requests that Condition 22 be revised to require Republic to maintain a written set of procedures on paved and unpaved road dust control activities. On a daily basis, Republic would then verify that these procedures were implemented without listing the specifics that would currently be required with the permit as written.

Condition 22.g requires that LFG flow and operating times for the flare be recorded on a daily basis. Neither Republic nor its contractors inspect the flare on a daily basis to record these values. However, the chart recorder for flow rate records the LFG flows on a continuous basis, and the temperature chart recorder indicates when the flare is operating or not. These can be used to compile the records required under Condition 22.g. If this will be sufficient to meet the requirements of Condition 22.g, then no change is required for the condition as written. If the District is envisioning something more than what is described above for recordkeeping, then Republic would take issue with its necessity and redundancy.

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Condition 23 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.

Condition 8 of the permit conditions for the pugmill source (S-5) contains a new requirement for visual emissions observations. While Republic does not have a problem with completing periodic visual observations for the pugmill source, requiring it for all activities of the pugmill seems onerous. Republic would like to see this condition revised to require periodic observations during representative times with a proposed minimum frequency of quarterly, which is consistent with the California Air Resources Board (CARB) guidance for enhanced monitoring of fugitive particulate matter sources for visible emissions.

**Condition 4 of the permit conditions for the ash silo (8-6) and baghouse (A-6) contains a new requirement for visual emissions observations. We have the same comment for this permit condition as listed above under comment #14.**

Under Section VII (Applicable Limits and Compliance Monitoring Requirements) of the draft permit, Table VIIA lists the wellhead limits for oxygen and temperature as set forth under BAAQMD Rule 8-34-305. Republic recently requested alternatives to these limits for certain LFG extraction wells within the first addendum to the GCCS Design Plan, which was recently submitted to your office (May 2003). Republic requests that the Title V permit clearly identify the individual wells that are exempt from these requirements or for which alternatives exist, as specified in the addendum to the GCCS Design Plan. This would probably be best handled by inserting additional permit conditions under the permit conditions

for the landfill (S-I) and LFG flare (A-3).

There are several typos in the Pennit Evaluation and Statement and Basis document. In several places on Page 24, the facility is referred to as "Vasco Road Republic Services" instead of "Republic Services Vasco Road." Also, the "Shoreline Arnphitheatre" name appears in location instead of the Republic name. Please correct these typos as necessary .

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Closing

If you have any additional questions or concerns, please contact me at (925) 447-0491. 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. Republic would be glad to discuss any of these issues with you or to meet with you at your convenience.

**Sincerely,**

*ClJJIiL-*

**Dave Grede**

**Environmental Health and Safety Manager Vasco Road Landfill**

cc:

Pat Sullivan, SCS Engineers

Eric Horton: Republic Services Vasco Road