

Comments to BAAQMD from Waste Management

**From:** Phadnis, Rajan

**Sent:** Thursday, July 25, 2019 3:42 PM

**To:** Loi Chau

**Cc:** Netzt II, Marcus; Nourot, Tianna; Colline, Christian; Rocha, Luis

**Subject:** RE: Major Facility Review Permit for Plant #2066

Hi Loi,

Please see comments on the latest Title V draft received on July 8, 2019:

**Page 86, Condition # 19235 1.B. (i) of the Title V permit -**

It is mentioned that the permit holder has been authorized to make the landfill gas collection system alterations pursuant to Permit Application #23198. Please note that allocations listed in the draft reflect actual balance allocations in 2019.

It is our understanding that authorized collection systems to which alterations can be made, should reflect the original counts as per the allocation mentioned in Permit Application #23198. Please see below for proposed language:

*The Permit Holder has been authorized to make the landfill gas collection system alterations described below pursuant to Permit Application # 27839. All collection system alterations shall comply with subparts 1b (i-vii) below.*

*i. The authorized collection system alterations are:*

- Install up to 120 vertical wells*
- Permanently decommission up to 100 vertical wells*
- Install up to 25 horizontal trench collectors*
- Permanently decommission up to 15 horizontal trench collectors*

In the Title V renewal application submitted in 2017, ALRRF had requested inclusion of the original well allocation count in the permit. ALRRF will submit a new permit application to renew well allocation permit for future well construction projects when original well allocations are depleted.

**Page 88, Condition # 19235 1.B. (v) of the Title V permit:**

It is mentioned that “for each well or collector that is permanently decommissioned after [insert date of approval of this condition change], the permit holder shall submit a decommissioning notice to the District within no later than **three** working days after the component was disconnected from vacuum system”.

Please see below for proposed language:

*For each well or collector that is permanently decommissioned after [insert date of approval of this condition change], the permit holder shall submit a decommissioning notice to the District within no later than 10 working days after the component was disconnected from vacuum system”.*

Per the title V renewal application submitted in 2017, ALRRF had requested for the three working days deadline be changed to ten days.

**Page 98, Condition # 19235 12.C of the Title V permit:**

As I understand, you are already working with Carol Allen on the revised TAC limits (Application # 28339).

Thank you,  
Rajan Phadnis  
EP Specialist

## BAAQMD Response to Waste Management Comments

**From:** Loi Chau  
**Sent:** Monday, August 26, 2019 2:13 PM  
**To:** Phadnis, Rajan  
**Cc:** Netzt II, Marcus; Nourot, Tianna; Colline, Christian; Rocha, Luis  
**Subject:** RE: Major Facility Review Permit for Plant #2066

Rajan,

The following is in response to your comments below:

**Regarding Comment on Page 86**

The number of wells reflect the remaining number of alterations permitted as of June 14, 2018. Would the following be an acceptable compromise:

*“The Permit Holder has been authorized to make the landfill gas collection system alterations described below pursuant to Permit Application # 27839 and updated as of June 14, 2018. All collection system alterations shall comply with subparts 1b (i-vii) below.”*

**Regarding Comment on Page 88, Condition # 19235 1.B. (v )of the Title V permit:**

Please provide a justifiable reason for the change in request. Since there are multiple facilities that are also subject to the 3 day notification requirement any changes to this facility will impact other facilities.

**Regarding Comment to Page 98, Condition # 19235 12.C of the Title V permit:**

Due to the timing of the renewal, Application #28197, #28339 (pending Waste Management's approval of the Permit Conditions), and #28727 (in progress) will be addressed in a Minor Revision to the Title V Permit following the completion of the Renewal Permit.

Regards,  
Loi Chau  
Air Quality Engineer

## Waste Management Response to BAAQMD Comments

**From:** Phadnis, Rajan  
**Sent:** Wednesday, September 11, 2019 4:40 PM  
**To:** Loi Chau  
**Cc:** Netz II, Marcus; Nourot, Tianna; Colline, Christian; Rocha, Luis  
**Subject:** RE: Major Facility Review Permit for Plant #2066

Hi Loi,

Thank you for your email. Please see below for response to the second item:

**Regarding Comment on Page 88, Condition # 19235 1.B. (v )of the Title V permit:**

*Please provide a justifiable reason for the change in request. Since there are multiple facilities that are also subject to the 3 day notification requirement any changes to this facility will impact other facilities.*

ALRRF is requesting this timeline change for submitting the decommissioning notification (from 3 working days to 10 working days) at its Altamont facility because this change does not affect any emissions at the facility and the 3-day timeline limit is not part of any applicable regulation.

As in the past, ALRRF will continue to submit decommissioning notifications in the timely manner, however, the extra time would provide additional flexibility to meet the facilities reporting requirements.

Thank you,  
Rajan Phadnis

## BAAQMD Response to Waste Management Comments

**From:** Loi Chau  
**Sent:** Thursday, September 19, 2019 7:33 AM  
**To:** 'Phadnis, Rajan'  
**Cc:** Netz II, Marcus; Nourot, Tianna; Colline, Christian; Rocha, Luis  
**Subject:** RE: Major Facility Review Permit for Plant #2066

Rajan,

Although the proposed change does not impact emissions, this request is a change in the permit conditions and need to undergo the NSR application process for proper documentation. Rather than have the facility submit a new application to address this change, I would ask you to send a separate e-mail to request the change be incorporated into Application #28727. I will continue to discuss this change with my colleagues to determine if there are any additional impacts from granting this request.

Regards,  
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