



May 16, 2005

Mr. Ted Hull  
Permit Services Division  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

Re: Plant No. 3294 – Guadalupe Rubbish Disposal Company, Inc.  
Comments to Minor Title V Revision (Application #9780): April 7, 2005

Dear Mr. Hull:

The Guadalupe Rubbish Disposal Company, Inc. (GRDC) and EMCON/OWT, Inc. (EMCON/OWT) have reviewed the Proposed Minor Revision to the GRDC's Title V permit dated April 7, 2005. EMCON/OWT is submitting this comment letter on behalf of the GRDC to include language in the Title V permit to allow currently permitted changes to the gas collection and control system (GCCS) without additional modification of the Title V permit.

As indicated in the previous version of the Title V permit, the GCCS at the GRDC currently consists of 45 vertical wells and 9 horizontal trench collectors. On May 11, 2004, EMCON/OWT submitted Authority to Construct (ATC) Permit No. 9780 for the installation of 20 new vertical wells and 8 new horizontal trench collectors and the decommissioning of 12 vertical wells and 4 horizontal trench collectors. The Bay Area Air Quality Management District (BAAQMD) granted an ATC permit pursuant to this application on July 7, 2004. If all construction activities allowed by the permit are completed, the GCCS will include 53 vertical wells and 13 horizontal trench collectors. The number of permitted wells has been included in the revised Title V permit. However, to date none of the well construction or decommissioning activities allowed in the permit have been completed. The current Title V permit does not accurately reflect the number of wells currently in operation at the GRDC.

The ATC permit application was completed to cover any GCCS modifications that may be required over the effective period of the permit (2 years). The BAAQMD will be notified when the changes are actually made. Over the effective period of the permit, the number of wells may vary. It is conceivable that the total number could be greater than the numbers reported in the permit. For example, if all 20 approved vertical wells are installed before exiting wells are decommissioned, the GCCS would include a total of 65 vertical wells. It is unlikely that all of the construction activities included in the ATC would be conducted at the same time. Thus the well count will not match the permitted totals.

The permitted well count appears in two separate places in the draft Title V permit. Table II A indicates that the GCCS includes 53 vertical wells. Condition 6188 Part 2 indicates that the GCCS is currently permitted to include 53 vertical wells and 13 horizontal collectors. Both of these references to the number of wells should be revised.

EMCON/OWT proposes two revisions to correct the references to the number of wells. The reference to the number of wells in Table II A should simply be eliminated. The description for Source S-9 would then read: *Guadalupe Landfill: (Active Solid Waste Disposal Site with Active Gas collection System)*.

The following change to Condition Number 6188 Part 2 on page 32 is requested

~~2. The gas collection system at S-9 is currently permitted for 53 vertical collection wells and 13 trench collectors as identified in the collection and Control System Design Plan and Permit Applications #8118 and #9907. Prior to increasing or decreasing the number of landfill gas wells from the authorized total, or significantly changing the locations, depths or lengths of existing wells or collectors, an Authority to Construct shall be obtained from the APCO. (basis: Regulation 2-1-301, Regulation 8-34-301.1, Regulation 8-34-305)~~

2. The S-9 Guadalupe Landfill shall be equipped with a landfill gas collection system. Wells, collectors, and adjustment valves shall not be disconnected, removed, or completely closed, without prior written authorization from the District, unless the Permit Holder complies with all applicable provisions of Regulation 8, Rule 34, Sections 113, 116, 117, and 118.

a. The Permit Holder has been issued a Permit to Operate for the landfill gas collection system components listed below as of May 1, 2005. The Permit Holder shall apply for and receive an Authority to Construct before modifying the landfill gas collection system described below. Increasing or decreasing the number of vertical wells, changing the length of horizontal collectors, or moving the locations of vertical wells or horizontal collectors are considered modifications that are subject to the Authority to Construct requirement. Adding or modifying risers, laterals, or header pipes are not subject to this Authority to Construct requirement. The authorized number of landfill gas collection system components is the baseline count listed below plus any components added and minus any components decommissioned pursuant to Part 2b as evidenced by start-up/shut-down notification letters submitted to the District.

45 vertical wells

9 horizontal trench

b. The Permit Holder has been issued Authority to Construct (Application No. 9780) for the landfill gas collection system modification described below.

- Install up to 20 vertical wells
- Decommission up to 12 vertical wells
- Install up to 10 horizontal trench collectors
- Decommission up to 4 horizontal trench collectors

(Basis: Regulations 8-34-301, 8-34-301.1, 8-34-305)

The proposed Condition Number 6188 Part 2 will allow the GRDC to add and decommission wells as authorized by their ATC to ensure optimal operation of the system without multiple revisions to the Title V permit

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 408-382-5842.

Sincerely,

EMCON/OWT, INC.



Richard S. Merrill  
Project Manager

cc: Eddie Pettit, GRDC  
Joe Morse, GRDC