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To: [Moody, John@Waterboards](mailto:Moody.John@Waterboards)
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Subject: SMAQMD Comments to WDRs for Florin Perkins Landfill
Date: Monday, April 15, 2013 4:00:21 PM

Good Afternoon John,

My name is Michelle Joe from the Sacramento Metropolitan Air Quality Management District (SMAQMD) and I have been working with Pat Dunn of Dunn Environmental regarding demonstrating air quality permit applicability for the Florin Perkins Landfill site (Nancy C. Cleavinger, Trustee of the NC Cleavinger Revocable Trust; Et Al., Florin Perkins Landfill Unclassified Landfill Units Closure And Corrective Action).

Prior to the finalization of the testing and reporting schedules specified in the WDRs, I would like to comment that the following SMAQMD permitting requirements and timeframes be considered:

As required by SMAQMD Rule 201, Section 301, any person building, erecting, altering or replacing any article, machine, equipment or other contrivance, the use of which may cause, eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct. Furthermore, as required by SMAQMD Rule 201, Section 302, any person operating an article, machine, equipment or other contrivance, the use of which may cause, eliminate, reduce, or control the issuance of air contaminants, shall first obtain a Permit to Operate.

However, as provided in SMAQMD Rule 201, Section 112, any equipment which would emit any pollutants without the benefit of air pollution control devices less than 2 pounds in any 24 hour period would be exempt from obtaining an Authority to Construct.

To determine if this threshold is met for uncontrolled Non-Methane Organic Compounds (NMOC), Dunn Environmental was authorized by the SMAQMD on December 6, 2012 to conduct an initial source test according to the following timelines:

<i>Deadline</i>	<i>Action</i>
<i>Within 96 hours of start-up operation</i>	<i>Conduct the first initial sampling event</i>
<i>Within 7 operational days from the first sampling event</i>	<i>Conduct the second initial sampling event</i>
<i>Within 30 days from the completion of the initial source test event</i>	<i>Submit an initial source test report that encompasses both initial sampling events</i>

Upon submittal and review of the initial source test report, the SMAQMD will perform the following:

<i>Deadline</i>	<i>Action</i>
<i>Within 30 days or depending on SMAQMD workload</i>	<p><i>Review the initial source test report to determine if the following permitting exemption thresholds are exceeded:</i></p> <ol style="list-style-type: none"> <i>1. Uncontrolled Non-Methane Organic Compounds (NMOC or VOC) emissions from the project are greater than or equal to 2 pounds in any 24 hour period (to exceed the permit exemption requirements of SMAQMD Rule 201, Section 122),</i> <i>2. If applicable, the noncancer Acute/Chronic Hazard Index is greater than or equal to 1 for all cases (to</i>

	<p><i>exceed the DeMinimis risk thresholds specified in the SMAQMD's Soil/Groundwater Remediation Permitting Manual), and</i></p> <p>3. <i>If applicable, the Maximum Excess Cancer Risk is greater than or equal to 0.1 in a million (to exceed the DeMinimis risk thresholds specified in the SMAQMD's Soil/Groundwater Remediation Permitting Manual).</i></p>
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The SMAQMD will send a written notification to Dunn Environmental to indicate whether a permit application is needed. If any of the thresholds above are exceeded, Dunn Environmental shall comply with the following:

<i>Deadline</i>	<i>Action</i>
<i>Within 30 days of receiving written notification of permit applicability</i>	<i>Submit an application for Authority to Construct/Permit to Operate</i>
<i>Within 30 days of receipt of the application (SMAQMD Rule 202, Section 402)</i>	<i>SMAQMD determines application to be complete or incomplete (if incomplete, new 30 day review for completeness starts when new information is furnished).</i>
<i>Within 180 days of determining an application as complete (SMAQMD Rule 202, Section 407.1a.)</i>	<i>SMAQMD takes final action [to approve or deny] on the application. The Authority to Construct will likely contain or align to the requirements of the WDRs.</i>
<i>Within 2 years of issuance of an Authority to Construct (SMAQMD Rule 201, Section 301)</i>	<p><i>Authority to Construct expires, unless an extension (up to 2 years) is requested and approved by the SMAQMD</i></p> <p><i>-or-</i></p> <p><i>Project is completed and Permit to Operate is issued.</i></p>

Thank you for your time and consideration, and please let me know if you should have any questions or need any additional information.

Sincerely,

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