



August 20, 2010

Teresa Dominick
Altamont Landfill and Resource Recovery Facility
10840 Altamont Pass Road
Livermore, CA 94551

Subject: Five-year Solid Waste Facility Permit (SWFP) Review Determination for Altamont Landfill & Resource Recovery Facility (ALRRF) (01-AA-0009)

Dear Ms. Dominick:

The Local Enforcement Agency (LEA) has completed its review of the 5-year Solid Waste Facility Permit application including 3 volumes of the revised Joint Technical Document (JTD), received on June 7, 2010 and a 2nd revision of the JTD (Section 4, 7 & Appendix I-2: Asbestos Management Plan), received on July 8, 2010.

The LEA has determined that no revision to the current Solid Waste Facility Permit (SWFP) is required. The revision of the JTD is considered to contain minor changes and is consistent with the existing CUP and CEQA requirements.

As a result of the 5-Year Permit Review, a Report of Facility Information (RFI) Amendment is required. **Please submit a Solid Waste Facility Permit (SWFP) application of RFI Amendment.**

Please see the attached 5-Year Permit Review Summary Report and check the additional pages for "findings/comments" of the revised JTD. Re-submit revised pages of JTD to reflect the "findings/comments" listed in this Review Summary Report in order to complete the RFI Amendment application.

As of today, the LEA cannot determine or approve the new Material Recovery Facility (MRF) or composting facilities (ie. Reclaimable Anaerobic Composter (RAC)) without the issuance of a revised or otherwise updated Conditional Use Permit, and supporting CEQA correspondence for our review. Please indicate "these" sections within the JTD with a note (i.e. These future operations are not yet approved and are subject to further review by the LEA and CalRecycle).

Any design or operational changes associated with the current operation are not sanctioned until incorporated into a SWFP, which has been concurred in by CalRecycle and issued by the Local Enforcement Agency.

Your cooperation is appreciated. If you have any questions about the process, please contact Wing Suen (510) 777-2218.

Very truly yours,



Wing Suen, REHS
Office of Solid/Medical Waste Management
Alameda County
Department of Environmental Health

Cc: Reinhard Hohlwein, CalRecycle
Jorge Goitia, LEA
Ronald Browder, LEA
Tianna Nourot, WM
Debra Kaufman, ACWMA
Bruce Jensen, Alameda County Planning dept.

ATTACHMENT:

Findings/Comments of updating the JTD (JUNE 2010) for the 5-year permit review

8/20/10

1. Provide a copy of the transmittal - the 2nd revised JTD Section 4, section 7 and the Appendixl-2, Asbestos Management Plan to the **“Alameda County Planning department.”**
2. Section 2.7.8 (P.2-10 & 11), What’s the update of section 401 & 404 permit? Pending for approval since 2005 & will be finalized in summer 2010.
3. Section 3.2.1 (P.3-2), 210ft to 1040ft (previous JTD) vs 210 to 299ft (recent JTD), which one is correct?
4. Section 4.1.1.1, Leachate Impoundments, (P.4-2,3) Provide a support document of the Water Boards approval yet & note in this paragraph of the JTD p.4-2 & 3)
5. Section 4.1.2, Resource Recovery Activities (p.4-4), “State” or “indicate” Composting operations & MRF **are not approved yet** & in future plans at the time of 5 yrs. permit review.
6. Section 4.1.3.2., Future Ancillary Facilities, (p.4-11), **Same as #5.**
7. Material Recovery Facility (MRF), Composting facilities and Reclaimable Anaerobic Composter (RAC) System, (p.4-12, 13 & 14) **Same as #5** and remove the phrase, “the Registration-Level Permit.....” please refer to the permit review report directive.
8. Section 4.4.1, Existing Waste Volume, (P.4-23), last paragraph – “Need to provide support document” to indicate that “no limit by the current (2005) SWFP” because the 2005 JTD only showed 1998 SWFP limits asbestos containing waste acceptance to 2000 tpd. Please explain.
9. ADD FILL SEQUENCING schedule in JTD in pg5-7 (**Annual “January”**)
10. Section 7.1, (p7-2), Incomplete sentence/paragraph of the last paragraph. **Provide the missing info.**
11. Section 7.4.2, Unloading Operations, (p.7-6,7), Need to provide **description of what types of barriers or fences in place for distinguishing the “active asbestos unloading zone” as an asbestos designated area** from the 2nd active face for MSW)
12. App. G-2 (p.3), General Assumption, remove “green waste” as ADC unless, it’s purchased from other county or otherwise, permitted under the Alameda County Ordinance 2008-01.
13. Table 16 & 17, **same as #12.**
14. Section 7.4.6.3, Processed Green Material, (P.7-15). Modified the wordings to-Green waste material as on intermediate cover and/or final covered areas as erosion protection is subject to LEA evaluation and review.
15. Section 7.4.6.3, Processed C&D Wastes, (p.7-17). Provide support documents to use green waste mixed w/ solidified waste to Class III active face.
16. Treated Sewage Sludge and Water Treatment Sludge & Treated Sludges and Green Material (Combination) (p.7-17&18) **Same as #15.**
17. Section 7.6.2. Waste Tire Recycling, (p.7-23) Rewrite this section because the Shamrock Recycling of California (Shamrock) only can handle 150 tires per day without obtaining a Waste Tire Facility Permit (WTFP) operating under the existing “Altamont Landfill SWFP”. The 14CCR § 18420(a)(1) does not state that the Shamrock does not require to obtain a waste tire facility permit. Please see the Public Resource Code (PRC) 42808.

PRC 42808. "Waste tire facility" means a location, other than a solid waste facility permitted pursuant to this division that receives for transfer or disposal less than 150 tires per day averaged on an annual basis, where, at any time, waste tires are stored, stockpiled, accumulated, or discarded. "Waste tire facility" includes all of the following:

(a) "Existing waste tire facility" means a waste tire facility which is receiving, storing, or accumulating waste tires, or upon which waste tires are discarded, on January 1, 1990.

(b) "Major waste tire facility" means a waste tire facility where, at any time, 5,000 or more waste tires are or will be stored, stockpiled, accumulated, or discarded.

(c) "Minor waste tire facility" means a waste tire facility where, at any time, 500 or more, but less than 5,000, waste tires are or will be stored, stockpiled, accumulated, or discarded. However, a "minor waste tire facility" does not include a tire dealer or an automobile dismantler, as defined in Sections 220 and 221 of the Vehicle Code, who stores waste tires on the dealer's or dismantler's premises for less than 90 days if not more than 1,500 total used or waste tires are ever accumulated on the dealer's or dismantler's premises.

Each of the tire facilities shall comply one of the followings:

Do not store more than 499 waste tires on site without a WTFP OR do not store more than 1500 waste tires for 90 days if qualified as a Tire dealer 14 CCR 18420 (a) (7) & (e).

18. For the entire JTD, change all CIWMB to CalRecycle. (For examples p.5-3, Table 1. 3rd column, change CIWMB to CalRecycle, p.6-2, p. 4-12, 14, p.6-17 &)

End.