

OPERATING PERMIT - TECHNICAL SUMMARY
GENERAL OPERATING PERMIT - GOP
RENEWAL OF AUTHORIZATION

Permit No.: O2062	Permit Type: GOP No. 517	Project No.: 6636	Project Renewal Type:
Customer Ref. No.: CN600331730	Company Name: City of Dallas, Department of Sanitation Services		
Regulated Entity RN100752146 No.:	Site Name: McCommas Bluff Landfill		
Account No.: DB-5077-A	Area Name: McCommas Bluff Landfill		
County: Dallas	Region: 04		
SIC Code: 4953	SIC Name: Refuse Systems		
Permit Reviewer: Mr. Tan Duy Nguyen	Engineer Assign Date: September 30, 2004		
Peer Reviewer: Bonnie Evridge	Application Receive September 3, 2004 Date:		

PERMIT INFORMATION

Is confidential information included in the application? **No**
Was the application shield removed? **No**

SITE INFORMATION

Physical Location: 5100 Youngblood Rd.
Nearest City: Dallas
Major Pollutants: None
Additional FOPs: None

PROJECT SUMMARY

Date of Initial Issuance grant letter: 09/27/2000	Date of ATO expiration: 09/27/2005
Date Renewal application received: 09/03/2004	Timely Renewal: Yes
Date of IS-3 (Legislative Notification) letters: 10/11/2004	

Description of revision items received on 09/03/2004:
The company requested that their authorization under GOP No. 516 be converted to GOP No. 517.
The company updated page 1 of form OP-REQ1.

Description of revision items received on 11/23/2004:
The company requested to add the following tanks to their authorization: DIESEL2, OIL1, OIL2, and OIL3. The company also updated the PBR authorizations for the site.

Date application determined complete (no deficiencies): 11/30/2004

PROCESS DESCRIPTION

Waste at the McCommas Bluff Landfill is generally filled using a three step process. This process consists of spreading the waste on the ground surface or landfill liner, compacting the waste using heavy equipment, and covering the compacted waste with a six inch layer of soil. There are two landfill gas management systems in place at McCommas Bluff Landfill. The first consists of a compressor, exchangers, evaporators, and a thermal oxidizer. This system is owned and operated by Ecogas and they are under a contractual agreement with the City of Dallas to ensure compliance with emissions guidelines. When this system is not in use the landfill gas is routed to an open flare that is also operated at the site by Ecogas. Decomposing waste encapsulated in the landfill produces methane, carbon dioxide, and other trace gases. This gas is collected from the landfill by a network of perforated piping, then it is transferred to the treatment system where it is refined to be sold. This system serves to control odor and air emissions, maintain groundwater quality, and prevent migration of gas into adjacent soils. Landfill gas condensate is sent to a wastewater treatment facility for disposal and leachate is collected in a tank and then discharged into the sewer. The McCommas Bluff Landfill covers 2038.8 acres and has 965 acres permitted to accept waste.

TECHNICAL REVIEW

The McCommas Bluff Landfill was issued an initial authorization to operate under the Site-Wide GOP Number 516 on 09/27/2000. The Site-Wide GOP Number 516 was revised on 02/27/2004 to require permit holders to convert to a site operating permit. The City of Dallas requested that their authorization be converted to the Landfill GOP Number 517. The McCommas Bluff Landfill is an area source subject to the Title V program due to being subject to the requirements of 30 TAC 113, Subchapter D, Municipal Solid Waste Landfills.

Review of the permit file showed that there was insufficient information to determine potentially applicable requirements for the emission sources listed in the permit: a 3000 gallon diesel tank, a 155,000 gallon leachate tank, and the landfill. The technical contact person, Mr. Sury Suryanarayan, was contacted to request additional application information. Mr. Sury referred questions to the company's consultant, Mr. Zachary Haston.

Mr. Haston was contacted on 10/05/2004 and 10/25/2004 to discuss the requested information. A faxed update was received on 11/12/2004 and included the following forms: OP-1, OP-CRO1, OP-ACPS, OP-SUM, OP-UA3, OP-UA44, and OP-REQ1. In addition to updating information for existing units, four emission units were added to the application: a 12,000 gallon diesel tank, a 2,000 gallon engine oil tank, a 2,000 gallon waste oil tank, and a 2,000 gallon hydraulic tank. Review of the updated information revealed one discrepancy with the landfill GOP index number on form OP-UA44. Mr. Haston was contacted and the discrepancy was resolved. The updated information was received by the TCEQ on 11/23/2004.

An OP-CRO2 form and two OP-DEL forms were received on 11/22/2004 to appoint a new responsible official and two duly authorized representatives.

COMPLIANCE REVIEW

Compliance History

In accordance with 30 TAC Chapter 60, a compliance history report was prepared on 11/12/2004.

The compliance period was from 09/23/1999 to 11/12/2004.

An evaluation for Federal Orders was conducted on 11/12/2004.

Was the application received after September 1, 2002? Yes

If yes, what was the site rating and classification? 1.89 - average

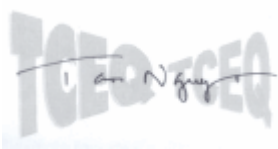


If yes, what was the company rating and classification? 3.11 - average

If no, provide a description of the compliance history.

Is the GOP recommended to be denied or has the permit changed on the basis of the compliance history or rating? No

FINAL STATE ACTION

Grant Letter Date:

	<u>Technical Reviewer</u>	<u>Peer Review</u>	<u>Team Leader/Manager</u>
Signature:			
Printed Name	<u>Mr. Tan Duy Nguyen</u>	<u>Bonnie Evridge</u>	<u>Hector Garcia Jr.</u>
Date:	<u>12/01/2004</u>	<u>12/01/2004</u>	<u>12/01/2004</u>
Points:	<u>3.0</u>	<u>3.0</u>	<u>3.0</u>

ADMINISTRATIVE DATA

Responsible Official: Mr. Ramon F. Miguez, P.E.
Assistant City Manager
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1500 Marilla
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Duly Authorized Rep: Ms. Mary Nix
Assistant Director
City of Dallas, Department of Sanitation Services
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Mr. Jody Puckett
Director
City of Dallas, Department of Sanitation Services
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Technical Contact: Mr. Sury Suryanarayan
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