



DEPARTMENT OF ENVIRONMENTAL QUALITY
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April 3, 2012

BY E-MAIL
pwslarry@msn.com

Larry Henk
DKL Holdings, Inc
Marana Regional Landfill
P.O. Box 32803
Tucson, AZ 85751-2803

Re: Response to Comments Submitted March 15, 2012 (Permit # 6133)

Dear Mr. Henk:

Enclosed in the attached document is Pima County Department of Environmental Quality's (PDEQ) response to DKL Holdings Inc (DKL) comments to the Marana Regional Landfill (MRLF) draft installation & operating permit.

If you have any questions, comments or corrections to the document, please call me Supervisor at (520) 243-7400.

Sincerely,

A handwritten signature in black ink, appearing to read "Mukonde Chama".

Mukonde Chama, P.E.
Air Permits Supervisor

Enclosure: PDEQ Response to MRLF Installation & Operating Permit Draft Comments

cc: Kay Gilmer by email Kay.Gilmer@Cornerstoneeg.com

PDEQ Response to Marana Regional Landfill Comments

Pima County Department of Environmental Quality (PDEQ) has accepted some comments as requested. This response addresses those comments that were not accepted or were accepted but modified to comply with PCC, the permit or applicable federal standards. Page numbers refer to the original draft documents sent to MRLF for comment.

Installation & Operating Permit Draft Document Comments

1. PDEQ has deleted the restrictions on modifying the permit as long as it is requested through a permit revision/ modification and Pima County Code (PCC) requirements are satisfied when the revision request is made.

2. *Part A General Provisions, Page 16*

This requirement is an Arizona Testing Manual requirement and cannot be modified. Should MRLF require more time to submit test results, requests can be made to PDEQ for an extension specifying the reasons why. PDEQ is aware of the need and has previously granted extensions for such requests.

3. *Page 19 – II Emission Limits/ Standards (A)(5)*

As discussed in our permit review meeting on April 2, 2012, PDEQ has modified the condition for the 19 hour limitation per day to only apply during mass excavation activities. Mass excavation is defined in the permit as agreed. MRLF will be required to notify PDEQ before and after mass excavation activities have occurred. MRLF is required to maintain records showing hours of operation during mass excavation activities. PDEQ has further clarified the definition of a “day” for this condition.

PDEQ has deleted the federal enforceability citation as it is redundant (Statement in the summary of the permit already addresses this fact). PDEQ will still maintain the requirement that it is a Material Permit Condition pursuant to PCC 17.04.340 (Material permit Condition definition, c.i). This condition prevents MRLF from triggering any other applicable requirement should the 19 hour limitation be exceeded during mass excavation operations.

4. *Page 19 – II Emission Limits/ Standards (A)(6)*

PDEQ has updated the condition following MRLF comments and permit condition language discussion during our meeting. As discussed during our meeting this limitation does not apply during periods of emergencies due to weather or other conditions that may necessitate varying the distances to ensure safe working conditions for employees or equipment.

5. *Page 19 – II Emission Limits/ Standards (A)(7)*

The condition has been modified to be consistent with the PCC requirement to maintain all roads (active roads for MRLF purposes) using all available reasonable means to prevent excessive amounts of particulate matter from becoming airborne. As this is an installation permit condition, MRLF will be required, during mass excavations, to especially monitor and maintain the roads identified in the modeling protocol to prevent emissions.

6. *Page 24 – III Monitoring Requirements (B)(1 and 2)*

The monitoring required in this condition are visible emissions checks not observations. PDEQ agrees that a certified Method 9 observer is not required to monitor checks. It should be noted however that should a Method 9 observer be needed, MRLF is required to have an observer available to quickly take Method 9 measurements as required by the permit.

7. *Page 24 – III Monitoring Requirements (C)(1)*

These monitoring requirements are necessary to show compliance with II.A.7 of Part B.

8. *Page 26 – III Recordkeeping Requirements (C)(1 and 2)*

These recordkeeping requirements are necessary to show compliance with II.A.7 and III.C.1 of Part B.

9. *Page 27 – V Reporting Requirements (B)(2).*

PDEQ does not require submission of semiannual reports of all required monitoring unless a deviation of a permit condition has occurred. For example, if there was a deviation during the January – June reporting period, then a semiannual report of required monitoring due July 31, associated with the deviation is required. All monitoring reports are required to be submitted with the compliance certification therefore there is no need to submit them semiannually. Additionally, PDEQ reviews any monitoring during compliance inspections.

Part B – Section 2 Combustion Processes

PDEQ has included the complete regulations that apply to the stationary water pump engine.

Comments to the Technical Support Document

PDEQ has updated the TSD to reflect changes in the draft installation and operating permit.