

May 2, 2008

Dr. Deborah Jordan  
Director, Air Division  
**U.S. Environmental Protection Agency**  
75 Hawthorne Street  
San Francisco CA 94105

Re: Ameresco Keller Canyon, LLC  
BAAQMD Application 16830

**ALAMEDA COUNTY**  
Tom Bates  
Scott Haggerty  
Janet Lockhart  
Nate Miley

**CONTRA COSTA COUNTY**  
John Gioia  
Mark Ross  
Michael Shimansky  
Gayle B. Uilkema

**MARIN COUNTY**  
Harold C. Brown, Jr.

**NAPA COUNTY**  
Brad Wagenknecht  
(Secretary)

**SAN FRANCISCO COUNTY**  
Chris Daly  
Jake McGoldrick  
Gavin Newsom

**SAN MATEO COUNTY**  
Jerry Hill  
(Chair)  
Carol Klatt

**SANTA CLARA COUNTY**  
Erin Garner  
Yoriko Kishimoto  
Liz Kniss  
Ken Yeager

**SOLANO COUNTY**  
John F. Silva

**SONOMA COUNTY**  
Tim Smith  
Pamela Torliatt  
(Vice-Chair)

Jack P. Broadbent  
**EXECUTIVE OFFICER/APCO**

Dear Dr. Jordan:

This is to advise you that the BAAQMD has completed the preliminary determination of compliance review for the following proposed new major facility:

Application	Facility #	Facility Name	Address, City	Type of Operation
16830	B7667	Ameresco Keller Canyon, LLC	901 Bailey Road, Pittsburg, CA 94565	Landfill Gas Fired Energy Plant (3.8 MW)

Ameresco Keller Canyon, LLC currently has an authority to construct and synthetic minor permit for a 3.8 MW power plant that includes two 2677 bhp lean-burn landfill gas fired internal combustion engines. Emissions from the engines were initially limited to 95 tons per year of carbon monoxide. Ameresco has requested modifications to this facility that will result in a facility-wide carbon monoxide emission rate of more than 100 tons per year, which makes this a proposed new major facility.

The PDOC documents the Air Pollution Control Officer's preliminary decision to issue an Authority to Construct for proposed new equipment at this site and to approve a Change of Conditions for currently permitted engines that are still under construction. The proposed modifications include the installation of a new landfill gas treatment system, installation of a small enclosed flare, and an increase of the CO emission limit that will allow the engines to operate continuously at maximum capacity. After implementation of these modifications, the facility will be permitted to emit the following maximum quantities of regulated air pollutants:

Carbon Monoxide (CO):	116 tons per year
Nitrogen Oxides (NOx):	33 tons per year
Precursor Organic Compounds (POC):	10 tons per year
Sulfur Dioxide (SO2):	10 tons per year
Particulate Matter (PM10):	6 tons per year

The enclosed Amended Preliminary Determination of Compliance (PDOC) summarizes how this proposed project comply with applicable District regulations, including BACT and emission offset requirements. The PDOC is subject to the public notice and 30-day public comment requirements of District Regulations 2-2-405 and 406.

Enclosed is a copy of the Preliminary Determination of Compliance for this application and a copy of the Notice Inviting Written Public Comment. Please submit any written comments on the intended action to the APCO by June 12, 2008.

If you have any questions regarding this matter, please contact Carol Allen, Senior Air Quality Engineer, at (415) 749-4702.

Very truly yours,

Signed by Jeff McKay for Jack P. Broadbent

Jack P. Broadbent

Executive Officer/APCO

Enclosure

**JPB:BFB:csa**

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