

August 13, 2004

Ms. Deborah Jordan, Director  
 Air Management Division  
**United States Environmental Protection Agency**  
 75 Hawthorne Street  
 San Francisco, CA 94105

Dear Ms. Jordan:

The District has completed the evaluation of the following application for a Significant Revision to a Major Facility Review Permit:

Plant #	Plant Name	Address, City	Type of Operation
A1179	Redwood Landfill, Inc.	8950 Redwood Highway Novato, CA 94948	Landfill

**ALAMEDA COUNTY**  
 Roberta Cooper  
 Scott Haggerty  
 (Chairperson)  
 Nate Miley  
 Shelia Young

**CONTRA COSTA COUNTY**  
 Mark DeSaulnier  
 Erling Horn  
 Mark Ross  
 Gayle Uilkema  
 (Secretary)

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

**NAPA COUNTY**  
 Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
 Chris Daly  
 Jake McGoldrick  
 Vacant

The purpose of this revision is to increase the maximum firing capacity and the landfill gas throughput limits at the flare. This revision will also make several minor corrections to permit conditions for the flare and to other sections of the permit. This application will result in emission increases as shown in the table below.

	Current Permitted Emissions at A-50 Tons/Year	Proposed Permitted Emissions at A-50 Tons/Year	Increase of Permitted Emissions at A-50 Tons/Year	New Facility-Wide Potential Emissions Tons/Year
POC	2.196	5.190	2.994	32.7
NOx	19.710	22.350	2.640	37.1
CO	98.550	111.750	13.200	117.7
PM10	6.023	6.371	0.348	224.1
SO2	25.135	28.661	3.526	30.6
NPOC	0.000	0.018	0.018	0.1

The proposed changes to the permit are summarized below.

- In Table II-B, change the capacity of the A-50 Flare from 75 MM BTU/hour to 120 MM BTU/hour.
- Add several missing sections of 40 CFR Part 60, Subpart WWW (flare operating and monitoring requirements) to Table IV-B.
- Delete future effective dates that have passed from Tables IV-B, IV-M, VII-B, VII-M and Condition # 19867, Part 22.
- Delete unnecessary requirements of Condition # 19867 (Parts 27 and 28) and delete references to these parts in Tables IV-B, VII-B, and VIII.
- Correct errors in Tables IV-B and IV-M and in Condition # 19867, Parts 16 and 30.
- Revise landfill gas throughput limits for A-50 in Condition # 19867, Part 20 and Table VII-B.
- Revise the NMOC emission limit for A-50 in Condition # 19867, Part 23 and Table VII-B.
- Revise the non-federally enforceable TAC destruction efficiency limit for A-50 in Condition # 19867, Part 24 and Table VII-B.

**SAN MATEO COUNTY**  
 Jerry Hill  
 Marland Townsend  
 (Vice-Chairperson)

**SANTA CLARA COUNTY**  
 Erin Garner  
 Liz Kniss  
 Patrick Kwok  
 Julia Miller

**SOLANO COUNTY**  
 John F. Silva

**SONOMA COUNTY**  
 Tim Smith  
 Pamela Torliatt

Jack P. Broadbent  
 EXECUTIVE OFFICER/APCO

The District has made a preliminary decision to issue the revised Major Facility Review, but the final decision on the permit issuance will consider public and EPA comments on this preliminary decision. The notice inviting written public comments will be published in the Independent Journal. The final date for comments is September 27, 2004.

Enclosed for your information is a copy of the proposed permit and the evaluation report, which will serve as the statement of basis for the revision. If you have any questions regarding this project, please call Steve A. Hill, Permit Evaluation Manager, at (415) 749-4673, fax (415) 749-5030.

Very truly yours,

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Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

Enclosures

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