

August 28, 2007

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

Subject: Minor Revision and Administrative Amendment to Major Facility Review
Permit for Facility # A1179

ALAMEDA COUNTY
Tom Bates
Scott Haggerty
Janet Lockhart
Nate Miley

Dear Ms. Jordan:

CONTRA COSTA COUNTY
John Gioia
Mark Ross
(Chair)
Michael Shimansky
Gayle B. Uilkema

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision and is issuing an administrative amendment to the Major Facility Review Permit for Redwood Landfill, Inc., Facility Number A1179, and is submitting the permit to EPA for review.

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

The main purpose of this proposed minor permit revision is to incorporate permit condition revisions related to a minor new source review permit (Application # 11371) that was approved by the District in January 2007. This project increased the maximum permitted landfill gas throughput rate for the A-51 Landfill Gas Flare up to the maximum capacity of this device and reduced the landfill gas throughput limit for the older A-50 Landfill Gas Flare. These changes resulted in a net heat input increase of 358,760 MM BTU per year for the two flares combined. The District also reduced the CO emission limit for the A-51 Flare from 0.3 pounds/MM BTU to 0.2 pounds/MM BTU as an updated RACT requirement. In addition to incorporating these Application # 11371 permit condition revisions, the District is proposing to update the landfill gas collection system description for S-5 based on start-up and shut-down notifications submitted to the District prior to August 1, 2007.

SAN FRANCISCO COUNTY
Chris Daly
Jake McGoldrick
Gavin Newsom

The Application # 11371 permit condition revisions increased the combined potential to emit from these two flares by the following amounts:

SAN MATEO COUNTY
Jerry Hill
(Vice-Chair)
Carol Klatt

SO ₂	25.39 tons/year
CO	14.39 tons/year
NO _x	10.76 tons/year
PM ₁₀	3.07 tons/year
POC	2.44 tons/year

SANTA CLARA COUNTY
Erin Garner
Yoriko Kishimoto
Liz Kniss
Patrick Kwok

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt
(Secretary)

Offsets were required for NO_x, POC, and PM₁₀ emission increases. NO_x and POC offsets were provided from the District's small facility banking account. PM₁₀ emission increases were offset by excess contemporaneous on-site emission reductions that resulted from Application # 17552 requirements to improve road surfaces and increase watering frequency for haul roads and other

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

areas. Since facility-wide SO₂ emissions were less than 100 tons/year, offsets were not required for this pollutant.

Since emission increases for this project are less than the major modification thresholds (100 tons/year of CO, 40 tons/year of SO₂, NO_x, and POC, and 15 tons/year of PM₁₀) and the proposed permit changes do not impact limits imposed pursuant to federal NSR, PSD NSPS, or NESHAP, this revision is not significant. This revision is minor pursuant to BAAQMD Regulation 2-6-215 and will be effective immediately. The permit will be formally re-issued after EPA review. This revision is not subject to public comment and therefore, requires no public notice.

The purposes of the administrative amendment are to change the Responsible Official and Plant Contact for this MFR Permit and to remove two sources from the MFR Permit for Site # A1179 (S-25 Yard and Green Waste Stockpiles and S-45 Pumpmaster Engine). The S-25 Yard and Green Waste Stockpiles were associated with the S-44 Yard and Green Waste Shredding Operation and S-24 Tub Grinder Motor. This equipment (S-44 and S-24) was shut down and removed from this site's District permit prior to initial issuance of the Title V permit for this site. The S-25 Yard and Green Waste Stockpiles should have been removed from the District permit as well, but it was overlooked. The District is correcting this error by removing S-25 from the Title V permit. On October 4, 2006, Redwood Landfill notified the District that the S-45 Pumpmaster Engine had been shut down and removed from the facility. Therefore, the District is removing S-45 from the MFR Permit.

The proposed Major Facility Review Permit and the statement of basis can be viewed and downloaded on the BAAQMD website at: http://www.baaqmd.gov/pmt/title_v/public_notices.htm. If you have any questions on this matter, please call Dennis Jang, Senior Air Quality Engineer, at: (415) 749-4707, fax (415) 749-5030.

Sincerely,

Signed by Jack P. Broadbent
Jack Broadbent
Executive Officer/Air Pollution Control Officer

JB:BFB:myl