

July 15, 2004

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

Dear Ms. Jordan:

The District has reopened the following Major Facility Review (MFR) Permits:

Application	Facility #	Facility Name	Address, City	Type of Operation
None	A1840	West Contra Costa Sanitary Landfill, Inc.	Foot of Parr Blvd, Richmond, CA 94801	Landfill Operations and Power Generation

The purpose of this reopening is to add the requirements related to the NESHAP for Municipal Solid Waste Landfills (40 CFR 63, Subpart AAAA) that was promulgated on January 16, 2003. Reopening this permit is required by Regulation 2, Rule 6 and by EPA's Title V regulations, because the expiration date for the permit is more than three years from the date of promulgation of the standard. The following specific changes are proposed pursuant to the reopening action:

- Add MSW Landfill NESHAP requirements to Tables IV-A, IV-B, IV-F, VII-A, VII-B, and VII-F.
- Revise Condition # 17821 and Table IV-A by adding Part 15. This part requires semi-annual reports pursuant to the above NESHAP requirements and allows these reports to be combined with the Title V semi-annual monitoring reports.

The District is also proposing administrative amendments and minor revisions to this permit in order to correct title page information, update citations and dates based on SIP approvals and other regulatory changes, correct errors, and clarify language.

The District proposes the following specific changes:

- Correct facility contact and APCO information on the title page.
- Correct regulatory references and amendment dates in Section I and Tables III, IV-A, IV-B, IV-C, IV-D, IV-E, and IV-F.
- Delete outdated SIP requirements and future effective dates that have passed in Tables II-B, III, IV-A, IV-B, IV-F, VII-A, VII-B, VII-F, and VIII.
- Incorporate new BAAQMD amendments and SIP requirements in Tables III, IV-A, IV-B, and IV-F.
- Add several recently identified generally applicable regulations to Table III.
- Correct errors by deleting Regulation 8-34-501.3 and 507 from the applicable requirements for landfill gas fired engines in Tables IV-A, IV-F, VII-A, and VII-F and the basis for Conditions # 5771, Part 10 and # 17812, Part 10.

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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

- Delete obsolete NMOC and THC requirements from Condition # 5771, Parts 6 and 7 and Table VIII.
- Revise Condition # 5771, Part 10 for consistency with MFR permit revision procedures in Regulation 2, Rule 6.
- Clarify text in Condition # 17812, Part 4.
- Delete Condition # 17812, Parts 5 and 8 and associated test methods in Table VIII, because these POC and THC requirements are obsolete. Revise subsequent part numbers in Condition # 17812 and Tables IV-F, VII-F, and VIII. Revise the new Condition # 17821, Part 8 to eliminate obsolete THC testing requirements.
- Revise Condition # 17821, Parts 2, 12, and 13 and Table IV-B to correct the basis for these parts.
- Clarify an equation in Condition # 17821, Part 3.
- Clarify text in Condition # 17821, Part 5.
- Revise Condition # 17821, Part 9 for consistency with MFR permit revision procedures in Regulation 2, Rule 6.
- Revise Condition # 17821, Part 11 to eliminate obsolete THC testing requirements.
- Clarify Condition # 17821, Part 12 by specifically listing the organic compounds requiring analysis (instead of referring to the AP-42 table) and adding the AB-2588 Hot Spots Act to the basis.
- In Table VIII, BAAQMD Regulation 6-310, Particle Weight Limitation.
- In Table VIII, delete an obsolete test method reference for sulfur dioxide, and add the missing test method references for Conditions # 5771, Part 7, # 17812, Part 8, and # 17821, Parts 11 and 12.
- Add Section X Revision History and revise subsequent section numbers.
- Add and correct several terms in Section XI Glossary.

None of the proposed revisions will result in any emission changes at this facility. All changes to the permit are clearly shown in strikeout/underline format.

The final permit will address public and EPA comments on this preliminary decision. The notice inviting written public comments will be published in the Contra Costa Times. The final date for comments is August 27, 2004.

Copies of the proposed Major Facility Review Permit and the statement of basis/permit evaluation are enclosed for your information. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Very truly yours,

Jack P. Broadbent
Executive Officer/
Air Pollution Control Officer

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Enclosures

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