Bay Area Air Quality Management District

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Engineering Evaluation
and
Statement of Basis
for
MAJOR FACILITY REVIEW PERMIT
ADMINISTRATIVE AMENDMENT

for

Waste Management of Alameda County
Facility #A2066

Facility Address:
10840 Altamont Pass Road
Livermore, CA 94550

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Application Engineer: Carol Allen
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May 2013

Application: 23692

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ENGINEERING EVALUATION and STATEMENT of BASIS

Waste Management of Alameda, Inc.; Site # A2066

APPLICATION # 23692

I. STATEMENT OF BASIS FOR APPLICATION # 23692

In accordance with New Source Review Application # 23687, the District increased the landfill gas concentration limit for ethylene dichloride from 200 ppb to 700 ppb and increased the ethylene dichloride fugitive emission limit from 87 pounds/year to 304 pounds/year. These limits are specified in Condition # 19235, Part 12 and are reflected in Table VII-A of the Title V permit for Site # A2066.

Since the above action revises permit conditions applicable to this facility, the MFR Permit for Site # A2066 must also be revised to incorporate the changes. This revision involves non-federally enforceable conditions only. Therefore, this revision may be handled as an administrative amendment.

In addition to the change discussed above, the District is also correcting typographical errors that appeared in the final Title V renewal permit that was issued on December 19, 2012. Several concentration limits in Condition # 19235 Part 12 that were supposed to have been deleted are still appearing in Part 12. The District is correcting this error by removing the obsolete limits. In addition, the Part 12 ethylidene dichloride limit was inadvertently omitted from Table VII-A. The District is correcting this omission by adding the applicable limits to Table VII-A.

The MFR Permit will be modified as described below.

A. SECTIONS I-V, VIII, IX, AND XI:

No changes are proposed to these sections.

A. SECTION VI:

This MFR Permit revision will modify Condition # 19235, Part 12 as indicated below in strikeout and underline format.

Condition # 19235

FOR: S-2 ALTAMONT LANDFILL - WASTE DECOMPOSITION PROCESS, EQUIPPED WITH LANDFILL GAS COLLECTION SYSTEM, AND ABATED BY A-15 LANDFILL GAS FLARE AND A-16 LANDFILL GAS FLARE;
S-43 ALTAMONT LANDFILL - WASTE AND COVER MATERIAL DUMPING; AND
S-44 ALTAMONT LANDFILL - EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES:

(No Changes to Parts 1-11)

*12. Prior to initiation of gas collection from Fill Area 2, the Permit Holder shall submit a permit application for a Change of Permit Conditions, if any site-specific landfill gas characterization test indicates that the landfill gas at this site contains any of the following compounds at a level greater than the concentration listed below. The Permit Application shall be submitted to the Engineering Division, within 45 days of receipt of test results indicating a concentration above the levels listed below. Upon initiation of landfill gas collection from Fill Area 2, the concentrations of toxic air contaminants in landfill gas collected from either fill area of the Altamont Landfill shall not exceed the concentrations listed below. An excess of a Part 12 TAC concentration limit shall not be deemed a violation of this part, if the Permit Holder complies with the requirements in Part 12a and demonstrates to the District's satisfaction that increasing the concentration level of a compound will satisfy either Part 12b or Part 12c.

a. Within 45 days of submittal of a source test report indicating a concentration above the levels listed below, the Permit Holder shall submit a permit application to the Engineering Division of the District for a Change of Permit Conditions to increase the concentration level for that compound.

b. The Permit Holder shall demonstrate to the District's satisfaction that the requested higher concentration level for a compound will not result in an increase of the permitted emission level for that compound from the S-2 Altamont Landfill, as identified in the table below.

c. If the higher concentration level will result in an increase of the permitted emission level for one or more compounds, but this emission increase is accompanied by decreases in the permitted emission levels for one or more toxic air contaminants, the Permit Holder shall demonstrate to the District's satisfaction that the proposed emission changes will not result in a project risk that exceeds a limit in Regulation 2-5-302.

(Basis: Regulation 2-5-302)

Compound	Concentration in Collected LFG (ppbv)	Limit for Fugitive Emissions from S-2 pounds/year
Acrylonitrile	~~500~~300	70
Benzene	~~3300~~3,400	1,166
Benzylchloride	~~600~~500	278
Carbon Tetrachloride	100	68
Chloroform	100	52
1,4 Dichlorobenzene	~~1100~~2,600	1,678
Ethyl Benzene	30,000	13,987
~~Ethylene Dibromide~~	~~300~~	
Ethylene Dichloride	~~250~~200700	~~87~~304
Ethylidene Dichloride	~~1200~~1,400	608
Isopropyl Alcohol	200,000	54,782
Methyl Alcohol	600,000	84,427
Methylene Chloride	~~2500~~12,000	4,476
Methyl Ethyl Ketone	200,000	63,331
Perchloroethylene	~~2400~~7,300	5,316
1,1,2,2 Tetrachloroethane	~~550~~400	295
Toluene	200,000	80,925
Trichloroethylene	~~1400~~1,600	923
Vinyl Chloride	1,100	302
Xylenes	90,000	41,960

(No Changes to Parts 13-23)

B. SECTIONS VII:

The TAC concentration limits in Condition # 19235 Part 12 are reflected Table VII-A as shown below. The changes to this table are shown below. This application will not change any monitoring requirements for these non-federally enforceable limits.

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-2 ALTAMONT LANDFILL -WASTE DECOMPOSITION PROCESS, EQUIPPED WITH LANDFILL GAS COLLECTION SYSTEM AND ABATED BY A-15 LANDFILL GAS FLARE AND A-16 LANDFILL GAS FLARE; S-43 ALTAMONT LANDFILL - WASTE AND COVER MATERIAL DUMPING; AND S-44 ALTAMONT LANDFILL - EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TAC Limits	BAAQMD Condition # 19235, Part 12	N		Ethylene Dichloride: ≤ ~~200~~700 ppbv in LFG or < ~~87~~304 pounds/year of fugitive emissions from S-2	BAAQMD Condition # 19235, Parts 14-15	P/A	Gas Characteri-zation Analysis and Records
TAC Limits	BAAQMD Condition # 19235, Part 12	N		Ethylidene Dichloride: < 1400 ppbv in LFG or < 608 pounds/year of fugitive emissions from S-2	BAAQMD Condition # 19235, Parts 14-15	P/A	Gas Characteri-zation Analysis and Records

C. SECTION X:

These above revisions are summarized in the revision history section as shown below.

X. Revision History

Renewal Revision (Application # 18233): December 19, 2012

… (add the following after all descriptions of Application # 18233 changes)

Administrative Amendment (Application # 23962): May 28, 2013

- Correct typographical errors in TAC concentration limits listed in Condition # 19235, Part 12 and in Table VII-A.
- Increase ethylene dichloride limit in Condition # 19235, Part 12 and in Table VII-A.

D. SUMMARY:

This action is constitutes an administrative amendment as defined in Regulation 2-6-201 because it involves only the correction of typographical errors and the revision of non-federally enforceable limits. It does not revise any monitoring requirements. It does not substantially change any applicable requirements.

In accordance with Regulation 2-6-413, this action does not require public notification or an EPA review period. Therefore, staff recommends that the APCO take final action on the administrative amendments proposed above and notify EPA as required by Regulation 2-6-413.4.

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II. ENGINEERING EVALUATION FOR APPLICATION # 23687

Engineering Evaluation
for
Landfill Gas TAC Concentration Limit Increase at S-2 Altamont Landfill and S-6, S-7, S-23, S-24, S-210, A-15, and A-16

Waste Management of Alameda County; PLANT # 2066

APPLICATION # 23687

A. BACKGROUND

Waste Management of Alameda County operates the Altamont Landfill and Resource Recovery Facility in Livermore, CA (Site # A2066). This site includes an active MSW landfill (Fill Area 1 is currently accepting waste and Fill Area 2 is scheduled to begin accepting waste in 2014), landfill gas control equipment (2 landfill gas fired turbines, 2 landfill gas fired IC engines, 2 enclosed flares, and a liquefied natural gas plant), 4 prime portable diesel oil fired IC engines that power waste tippers, 3 diesel oil fired engines for emergency standby generators, 1 diesel oil fired engine for a fire pump, a non-retail gasoline dispensing facility, waste water storage and processing equipment, and green waste storage and processing equipment.

On 11/18/09, the District approved an expansion and modification of the Altamont Landfill (S-2) under Application # 14814. Under this application, the District established TAC concentration limits for the landfill gas collected from Altamont Landfill to limit TAC emission rates for the modified landfill and all of the associated landfill gas combustion or processing equipment (A-15 and A-16 Landfill Gas Flares, S-6 and S-7 LFG-Fired Turbines, S-23 and S-24 LFG-Fired IC Engines, and S-210 Liquefied Natural Gas Plant).

Under this current Application # 23687, Waste Management has requested to increase the landfill gas concentration limit for ethylene dichloride from 200 ppb to 700 ppb. This request will result in increases in ethylene dichloride emissions for the landfill and all of the landfill gas combustion and processing equipment (S-2, S-6, S-7, S-23, S-24, S-210, A-15 and A-16).

B. EMISSIONS

Overview:

Active MSW landfills are significant sources of precursor organic compound (POC) emissions and toxic air contaminant (TAC) emissions. After waste has been buried in a landfill, biological processes slowly break down the wastes and generate off-gases. These gases, collectively known as landfill gas, contain mainly methane and carbon dioxide, but they also contain small amounts of numerous different precursor and non-precursor organic compounds, toxic air contaminants, and reduced sulfur compounds. As landfill gas generation progresses, the gas pressure within the landfill builds and the gases migrate toward lower pressure areas. Eventually, landfill gas (containing POCs and TACs) will begin to seep through the surface of the landfill.

To minimize these fugitive surface emissions, many landfills are equipped with landfill gas collection systems. Landfill gas collection systems include a series of connected pipes with perforated pipe sections buried within the refuse. Active gas collection systems use blowers to create a vacuum within the piping

system, which draws the underground landfill gas into the buried perforated pipe sections. The blowers vent the collected landfill gas to a landfill gas control system.

Landfill gas control systems typically involve burning the collected landfill gas. Collected landfill gas typically has a high enough heat content (400-600 BTU/scf) that it may be used directly as fuel in an energy recovery device, or it may be burned in an enclosed ground flare without the need for supplemental fuel. In addition to emitting very small amounts of residual POCs and TACs, these landfill gas combustion devices generate carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO_2), particulate matter (PM_{10}), and secondary TACs.

Active landfills also have high rates of particulate matter (PM_{10}) emissions resulting from cell construction and other site preparation activities, from vehicle travel on paved and unpaved roads, from waste filling and cover placement activities, from soil excavation processes, from cover material acceptance and preparation activities, and from wind erosion.

The emission calculation procedures and assumptions for the S-2 Altamont Landfill and the landfill gas combustion equipment are discussed in detail in the Engineering Evaluation for Application # 14814. The emission calculation procedures for the S-210 Liquefied Natural Gas Plant are discussed in detail in the Engineering Evaluation for Application # 19045.

Project Emission Changes:

For this application, Waste Management is not proposing to modify any waste acceptance rates, decomposable material disposal rates, POC, NPOC, or TRS concentration limits, or PM_{10} emission limits at S-2. Waste Management is not proposing any changes to throughput limits or criteria pollutant emission rates at landfill gas combustion devices. Therefore, this project will not result in any changes to any of the criteria pollutant emission limits for S-2, S-6, S-7, S-23, S-24, S-210, A-15, or A-16.

Waste Management has requested to increase the LFG concentration limit for ethylene dichloride from 200 ppb to 700 ppb. The ethylene dichloride emission changes for each affected source are presented below. Detailed emission calculation spreadsheets are attached.

Table 1. Proposed Ethylene Dichloride Emission Changes

	At 200 ppbv	At 700 ppbv	Risk Screen Trigger Level
	Pounds/Year	Pounds/Year	Pounds/Year
S-2	86.92	304.20	
A-15	1.28	4.48	
A-16	2.38	8.33	
S-6	0.86	3.02	
S-7	0.86	3.02	
S-23	2.37	8.29	
S-24	2.37	8.29	
S-210	0.0039	0.0135	
Total	97.0	339.6	5.3

C. STATEMENT OF COMPLIANCE

Regulation 2, Rule 1:

This application is for a change of permit conditions at the S-2 Altamont Landfill that does not involve any physical alterations or criteria pollutant emission changes, but that will involve a small increase in the

previously estimated maximum emission rate of ethylene dichloride – a toxic air contaminant (TAC). Ethylene dichloride is present in landfill gas due to the waste decomposition process. The previous emission rate was estimated based on site-specific landfill gas analyses, but recent testing has found that a higher ethylene dichloride emission estimate is necessary. This application is simply a clarification of the emissions resulting from the Fill Area 2 Expansion of the Altamont Landfill that was previously evaluated under Application # 14814.

As discussed in the Application # 14814 Engineering Evaluation, the Fill Area 2 Landfill Expansion was subject to an Environmental Impact Report (EIR) for which the County of Alameda was the lead agency. A revised final EIR was certified for the Fill Area 2 Landfill Expansion project in January 2000. A lawsuit delayed action on this EIR, but the lawsuit has now been settled. District staff reviewed the certified final EIR and settlement agreement requirements and determined that the proposed operations and equipment described in the application are expected to comply with all applicable District requirements. The District has evaluated the health impacts resulting from the proposed increase in ethylene dichloride emissions and has determined that the modified landfill will continue to comply with all applicable requirements including the toxic new source review requirements of Regulation 2, Rule 5. No additional air quality mitigation measures (beyond those required by the final EIR and settlement agreement) were deemed necessary. Therefore, this application has satisfied all requirements of Regulation 2-1-310. In addition, the Engineering Evaluation for this permit condition change uses fixed standards and objective measurements and does not involve any element of discretion. Consequently, no further CEQA review is required.

The project is over 1000 feet from the nearest school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

Regulation 2, Rule 2 (NSR):

Since this application does not result in any emission increases of criteria pollutants, this project will not require NOx or POC offsets and does not trigger a new BACT review for any criteria pollutants.

Regulation 2, Rule 2 (PSD):

The maximum permitted emission levels for this facility (including the new HAP emission levels that will result from the proposed permit condition change) are summarized below.

Table 2. Summary of Maximum Permitted Site-Wide Emission Rates

Tons/Year	PM10	POC	NOx	SO2	CO	HAPs	CO2 equiv
Site-Wide	426.187	154.237	180.442	92.064	225.000	143.708	565,443
Non-Fugitive	38.530	41.381	180.442	92.064	225.000	29.810	343,857
Non-Biogenic							3,908

Landfills are not one of the 28 source categories that are subject to the 100 ton/year PSD threshold and for which fugitive emissions must be included when determining the applicability of PSD requirements. Therefore, this site is subject to the 250 ton/year PSD threshold for regulated air pollutants and fugitive emissions may be excluded from the PSD applicability determination. As shown in Table 2, each non-fugitive regulated air pollutant emission rate (other than the emission rate for greenhouse gases) is less than the 250 tons/year PSD threshold for regulated air pollutants.

EPA's tailoring rule for greenhouse gases (GHG) established an alternative PSD and Title V Major Facility threshold of 100,000 tons/year of CO_2 equivalent GHG emissions. However, the implementation of the PSD and Major Facility requirements for biogenic GHG emissions has been deferred until July 1, 2014 pursuant to a July 20, 2011 federal register posting: http://www.gpo.gov/fdsys/pkg/FR-2011-07-20/pdf/2011-17256.pdf. In accordance with this amendment, biogenic GHG emissions from sources such as municipal waste decomposition and combustion of landfill gas may be excluded from the PSD applicability determination during this interim period. This site qualifies for this EPA regulatory deferral.

For this facility, GHG emissions will be greater than 100,000 tons/year of non-fugitive CO_2 equivalent GHG emissions, but non-biogenic GHG emissions are less than 4,000 tons/year of CO_2 equivalent emissions. Since non-biogenic GHG emissions are less than the 100,000 tons/year GHG threshold, this site is not currently subject to PSD due to GHG emissions.

New Source Review for Toxic Air Contaminants:

As shown in Table 1, this application will result in a 242.6 pound/year increase in the maximum permitted ethylene dichloride emission rate for the landfill and landfill gas combustion and processing equipment. In accordance with Regulation 2-5-216, the project emission increases for a modified source must include all post-1987 emission increases for that source. From Application # 14814, baseline ethylene dichloride emissions were determined to be 0.0 pounds/year. Therefore, all ethylene dichloride emissions from S-2 and the related landfill gas processing sources (339.6 pounds/year) must be included as part of this project. Since this project emission increase exceeds the risk screen trigger level of 5.3 pounds/year an updated HRSA is required for this application.

As discussed in the HRSA report for this application, a project must include all post-1987 emission increases for a modified source plus any related applications. For simplicity, the District will evaluate the maximum permitted emission levels from the landfill in order to assure compliance with AB-2588 Air Toxic Hot Spot requirements as well as toxics NSR. Since the Application # 21312 portable diesel tipper engine project was previously determined to be related the landfill expansion project, the tipper engine emissions will also be included in this updated HRSA.

Health impacts for this project, which includes maximum permitted emissions from the S-2 Altamont Landfill, S-6 and S-7 Gas Turbines, S-23 and S-24 IC Engines, A-15 and A-16 Landfill Gas Flares, and S-206, S-208, S-217, and S-218 Portable Waste Tipper Engines, are summarized below. The modeling procedures and calculation assumptions are discussed in detail in the attached HRSA report.

Table 1. Health Impacts for Proposed TAC Emissions and Future Tipper Engine Operating Scenario

	Cancer Risk per Million			Chronic Hazard Index	Acute Hazard Index
	MEI	Resident	Worker	MEI	
S-2 Altamont Landfill (Fill Area 1 and Fill Area 2)	7.59	4.563	0.881	0.113	0.025
A-15 and A-16 LFG Flares	0.04	0.013	0.005	0.008	< 0.001
S-6 and S-7 LFG Turbines	0.01	0.002	0.002	0.001	< 0.001
S-23 and S-24 LFG Engines	0.99	0.118	0.115	0.020	0.002
Any Single Diesel Engine in FA2 (S-206, S-208, S-217, or S-218)	0.72	0.264	0.100	0.0003	Not Applicable
Total for 4 Diesel Engines in FA2 (S-206, S-208, S-217, & S-218)	1.38	0.739	0.192	0.0005	Not Applicable
Total Project	7.88	4.704	0.922	0.114	0.025

At the location of the maximally exposed individual (MEI), total project impacts are: a cancer risk of 7.9 in a million, a chronic hazard index of 0.1, and an acute hazard index of

0.03. However, the location of maximum project impact is in an area that does not have any residential receptors. The project cancer risk for worker receptors at this location is 0.9 in a million. For residential areas near the Altamont Landfill Facility, the maximum project cancer risk is 4.7 in a million. In accordance with Regulation 2-5-302, project risk levels of less than 10.0 in a million cancer risk and less than 1.0 hazard index are acceptable, provided that District TBACT requirements are satisfied.

In accordance with Regulation 2-5-301, TBACT is required for any source that results in a cancer risk greater than 1.0 in a million or a chronic HI greater than 0.2. None of the sources exceed the chronic HI trigger for TBACT. The S-2 Altamont Landfill is the only source that results in a source risk that is greater than 1.0 in a million. Therefore, S-2 is subject to TBACT. The S-2 Altamont Landfill is equipped with landfill gas collection and control systems that are subject to and complying with CARB's landfill methane control measure. This CARB rule includes an integrated surface leak standard in addition to the NSPS equivalent instantaneous surface leak limit. For an active MSW landfill, compliance with the CARB landfill gas collection and control requirements and both the integrated and instantaneous landfill surface leak limits satisfies the requirement to use TBACT at an active MSW landfill.

Regulation 2, Rule 6:

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act (40 CFR, Part 70) and BAAQMD Regulation 2, Rule 6, Major Facility Review (MFR), because it is a major facility for NO_x and CO emissions and also because it is a designated facility (since it is subject to the control requirements of the Emission Guidelines for MSW Landfills). Therefore, this facility is required to have an MFR permit pursuant to Regulations 2-6-301 and 2-6-304.

The initial MFR Permit for this facility was issued on December 1, 2003 and was last revised on October 9, 2008. The District is in the process of renewing the Title V permit for this facility pursuant to Application 18233. The District expects the Title V permit renewal will be issued in December 2012. Since this application will result in permit condition modifications, a revision of the Title V permit will be required. Waste Management has submitted Application # 23692 to request a revision of the Title V permit to incorporate any permit condition changes approved pursuant to Application # 23687.

Applicable Regulations:

The S-2 Altamont Landfill and associated landfill gas combustion devices are subject to many District prohibitory regulations including: Regulation 6, Regulation 8, Rules 2, 34, and 40, and Regulation 9, Rules 1, 2, 8, and 9. In addition the landfill is subject to CARB's landfill methane control measure, federal EG/NSPS requirements, and NESHAP requirements. The landfill gas combustion devices are also subject to NSPS and NESHAP requirements. The specific applicable requirements are identified in detail in the proposed Title V renewal permit for this site. The proposed change to the ethylene dichloride emission limit at S-2 will not change any of these applicable requirements not result in non-compliance with any other applicable limits.

D. PERMIT CONDITION REVISIONS

The District is proposing to revise Condition # 19235, Part 12, as shown below in strike through and underline formatting. No other condition changes are proposed.

Condition # 19235

FOR: S-2 ALTAMONT LANDFILL - WASTE DECOMPOSITION PROCESS, EQUIPPED WITH LANDFILL GAS COLLECTION SYSTEM, AND ABATED BY A-15 LANDFILL GAS FLARE AND A-16 LANDFILL GAS FLARE;
S-43 ALTAMONT LANDFILL - WASTE AND COVER MATERIAL DUMPING; AND
S-44 ALTAMONT LANDFILL - EXCAVATING, BULLDOZING, AND COMPACTING ACTIVITIES:

[No changes to Parts 1-11]

*12. Prior to initiation of gas collection from Fill Area 2, the Permit Holder shall submit a permit application for a Change of Permit Conditions, if any site-specific landfill gas characterization test indicates that the landfill gas at this site contains any of the following compounds at a level greater than the concentration listed below. The Permit Application shall be submitted to the Engineering Division, within 45 days of receipt of test results indicating a concentration above the levels listed below. Upon initiation of landfill gas collection from Fill Area 2, the concentrations of toxic air contaminants in landfill gas collected from either fill area of the Altamont Landfill shall not exceed the concentrations listed below. An excess of a Part 12 TAC concentration limit shall not be deemed a violation of this part, if the Permit Holder complies with the requirements in Part 12a and demonstrates to the District's satisfaction that increasing the concentration level of a compound will satisfy either Part 12b or Part 12c.

a. Within 45 days of submittal of a source test report indicating a concentration above the levels listed below, the Permit Holder shall submit a permit application to the Engineering Division of the District for a Change of Permit Conditions to increase the concentration level for that compound.

b. The Permit Holder shall demonstrate to the District's satisfaction that the requested higher concentration level for a compound will not result in an increase of the permitted emission level for that compound from the S-2 Altamont Landfill, as identified in the table below.

c. If the higher concentration level will result in an increase of the permitted emission level for one or more compounds, but this emission increase is accompanied by decreases in the permitted emission levels for one or more toxic air contaminants, the Permit Holder shall demonstrate to the District's satisfaction that the proposed emission changes will not result in a project risk that exceeds a limit in Regulation 2-5-302.

(Basis: Regulation 2-5-302)

Compound	Concentration in Collected LFG (ppbv)	Limit for Fugitive Emissions from S-2 pounds/year
Acrylonitrile	300	70
Benzene	3,400	1,166
Benzylchloride	500	278
Carbon Tetrachloride	100	68
Chloroform	100	52
1,4 Dichlorobenzene	2,600	1,678
Ethyl Benzene	30,000	13,987

Ethylene Dichloride	~~200~~700	~~87~~304
Ethylidene Dichloride	1,400	608
Isopropyl Alcohol	200,000	54,782
Methyl Alcohol	600,000	84,427
Methylene Chloride	12,000	4,476
Methyl Ethyl Ketone	200,000	63,331
Perchloroethylene	7,300	5,316
1,1,2,2 Tetrachloroethane	400	295
Toluene	200,000	80,925
Trichloroethylene	1,600	923
Vinyl Chloride	1,100	302
Xylenes	90,000	41,960

[No changes to Parts 13-23]

E. RECOMMENDATION

Issue a Change of Conditions for the equipment listed below subject to Condition # 19235.

S-2 Altamont Landfill equipped with Landfill Gas Collection System and abated by A-15 and A-16 Landfill Gas Flares

signed by Carol S. Allen — October 17, 2012

By: Carol S. Allen — Date

Supervising Air Quality Engineer