

February 5, 2004

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

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

**CONTRA COSTA
COUNTY**

Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

Dear Ms. Jordan:

The requirements for public and EPA review of the following proposed significant revision to a Major Facility Review Permit have been completed:

MARIN COUNTY
Harold C. Brown, Jr.

Facility #	Facility Name	Application #
A2066	Waste Management of Alameda County	8324

NAPA COUNTY
Brad Wagenknecht

No comments from the facility, public, or EPA were received.

**SAN FRANCISCO
COUNTY**

Willie Brown, Jr.
Chris Daly
Jake McGoldrick

The main purpose of this revision is to change the key emission control system operating parameter and monitoring procedures for the Internal Combustion Engines (S-23 and S-24). Currently, the key parameter is average engine cylinder temperature and this temperature is monitored continuously. However, testing indicates that average engine cylinder temperature is not a good indicator of the NMOC destruction efficiency achieved by the engine. Therefore, the District is proposing to allow Waste Management to use a different key parameter: carbon monoxide concentration in the engine exhaust (corrected to 15% oxygen on a dry basis).

SAN MATEO COUNTY

Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY

Liz Kniss
Patrick Kwok
Julia Miller
Dena Mossar

SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith
Pamela Torliatt

The District is proposing to require daily monitoring of carbon monoxide and oxygen in the engine exhaust using a portable flue gas analyzer. The District is proposing to allow the monitoring frequency to be reduced to a weekly or monthly basis, if the corrected carbon monoxide concentration has low variability. The District is also proposing to revise the methane monitoring procedure that is used to calculate the heat input for these engines and to make other minor corrections. Specifically, the following changes have been made to the permit:

Jack P. Broadbent
EXECUTIVE
OFFICER/APCO

- Modify Permit Condition # 19237, Parts 4, 9, 10, and 11.
- Revise Tables IV-D, VII-D, and VIII to reflect revisions to Condition # 19237.
- Make minor corrections to requirements in Tables III, IV-A, IV-B, IV-D, and IV-E.
- Add Section X Revision History and correct numbering in subsequent sections.

The District has made the following additional corrections based on staff comments.

- Deleted future effective dates in Tables IV-A, IV-B, IV-D, IV-E, IV-G, VII-A, VII-B, VII-D, VII-E, and VII-G, because these dates have passed.

The District has made a decision to issue the Major Facility Review Permit.

Enclosed is a copy of the final permit. If you have any questions regarding this project, please call Steve A Hill, Air Quality Engineering Manager, at: (415) 749-4673.

Sincerely yours,

Jack P. Broadbent
Executive Officer / APCO

Enclosure:
Final MFR Permit for Site # A2066

JPB:BFB:myl

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