

October 5, 2004

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

Subject: Minor Revision to Major Facility Review Permit for Waste Management of Alameda County

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review Permit for Waste Management of Alameda County, Facility Number A2066, and is submitting the permit to EPA for review.

CONTRA COSTA COUNTY

Mark DeSaulnier
Erling Horn
Mark Ross
Gayle Uilkema
(Secretary)

The main purpose of this minor permit revision is to modify the key operating parameter limit for two landfill gas fired IC engines, because source test data indicates that the engines will comply with the Regulation 8-34-301.4 NMOC emission limit at a higher operating parameter level. For these engines, the key operating parameter is carbon monoxide concentration (corrected to 15% oxygen) in the engine outlet, which is measured using a portable flue gas analyzer. The corrected CO concentration limit will be increased from 215 ppmv to 330 ppmv. Since the margin of compliance with this proposed limit is not very large source testing shows that the engines are operating at about 85% of the limit), the District is increasing the length of time that daily monitoring is required and is imposing additional criteria that must be satisfied before monitoring may be reduced to a weekly or monthly basis. In addition, the District is proposing to delete the S-25 and S-26 Liquefied Natural Gas (LNG) Plants from the permit and to modify several related permit conditions, because S-25 and S-26 were never installed and the Authority to Constrict has expired. This revision will not result in any emission increases.

MARIN COUNTY

Harold C. Brown, Jr.

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Chris Daly
Jake McGoldrick
Vacant

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.

SAN MATEO COUNTY

Jerry Hill
Marland Townsend
(Vice-Chairperson)

A copy of the proposed revisions to the Major Facility Review Permit and the engineering evaluation for Application # 10013 are enclosed for your review and comment. This letter and the engineering evaluation constitute the statement of basis for this minor permit revision. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

SANTA CLARA COUNTY

Erin Garner
Liz Kniss
Patrick Kwok
Julia Miller

Sincerely,

SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith
Pamela Torliatt

Jack Broadbent
Executive Officer/Air Pollution Control Officer

Jack P. Broadbent
EXECUTIVE
OFFICER/APCO

JB:BFB:myl

Enclosures:

Engineering Evaluation of Application # 10013
Proposed MFR Permit Revisions for Site # A2066

h:\pub_data\titlev\permit\minor\2004\September\A2066Dminor.doc