

December 21, 2004

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

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 issuing two minor revisions and one significant revision to the Major Facility Review Permit for Waste Management of Alameda County. (Facility # A2066).

CONTRA COSTA COUNTY

Mark DeSaulnier
Erling Horn
Mark Ross
Gayle Uilkema
(Secretary)

Plant	Plant Name	Application	Permit Engineer	City	County
A2066	Waste Management of Alameda County	8583, 9326, and 10013	C. Allen	Livermore	Alameda

MARIN COUNTY

Harold C. Brown, Jr.

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Chris Daly
Jake McGoldrick
Gavin Newsom

SAN MATEO COUNTY

Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY

Erin Garner
Liz Kniss
Patrick Kwok
Julia Miller

SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

The District proposed two minor permit revisions for this facility. Both of these revisions concerned the key emission control system operating parameter limits for several landfill gas control devices at this site. These key parameters are intended to verify compliance with the Regulation 8, Rule 34 NMOC emission limits between annual source tests. The first minor revision (Application # 9326) was proposed on September 1, 2004. The purpose of this revision was to lower the minimum combustion chamber discharge temperature limit for two landfill gas fired gas turbines (S-6 and S-7). The second minor revision (Application # 10013) was proposed on October 5, 2004. The main purpose of this revision was to modify the key parameter - corrected CO concentration as measured by a portable analyzer - for two landfill gas fired IC engines (S-23 and S-24). This revision also removed two sources (S-25 and S-26) that were never installed from the MFR permit. These minor revisions resulted in no emission increases.

On October 5, 2004, the District also proposed a significant permit revision for this facility. The main purpose of this significant revision was to increase the maximum permitted firing capacity for the S-6 and S-7 Gas Turbines. In addition, the District proposed to incorporate the July 2004 revisions to the federal New Source Performance Standards (NSPS) for Stationary Gas Turbines. Since this revised NSPS eliminated the need for the Section V.B Custom Schedule of Compliance, the District also proposed to delete Section V.B. The District made several other corrections to citation references and changed the Responsible Official for this facility. This significant revision resulted in the following emission increases: 61.6 pounds/day and 18.5 tons/year of sulfur dioxide, 11.6 pounds/day and 3.5 tons/year of non-precursor organic compounds, and 7.7 pounds/day of precursor organic compounds.

The EPA comment periods on the minor revisions ended on October 27, 2004 and November 18, 2004, respectively. The public and EPA comment periods for the proposed significant revision ended on November 19, 2004. No comments were received from the public or EPA on any of these revisions. One comment letter was received from EMCON/OWT, Inc., a consultant for the facility, on November 19, 2004. The District has agreed to change Condition # 18773, Part 11 for the gas turbines as requested. The District plans to address the applicant's request for modification of the throughput limit at the S-99 Gasoline Dispensing Facility in a minor revision that is scheduled for proposal in December 2004. The District's responses to these comments are detailed in the attached transmittal letter to the applicant.

The District has decided to issue the revised permit incorporating the proposed minor revisions and proposed significant revision.

Enclosed are copies of the final revised permit, the letter from EMCON/OWT, Inc., and the response to the facility. If you have any questions regarding this permit, please call Steve A Hill, Air Quality Engineering Manager, at: (415) 749-4673.

Sincerely yours,

Signed by Jack P. Broadbent
Jack P. Broadbent
Executive Officer / APCO

Enclosure: Final MFR Permit for Site # A2066
November 19, 2004 Comment Letter from EMCON/OWT, Inc.
Transmittal Letter to the Applicant

JPB:BFB:CSA

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