

December 21, 2004

Ken Lewis, District Manager
Waste Management of Alameda County
10840 Altamont Pass Road
Livermore, CA 94550

Application Numbers: 8583, 9326, 10013

Plant Number: A2066

Equipment Location: 10840 Altamont Pass Road
Livermore, CA 94550

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Dear Mr. Lewis:

CONTRA COSTA COUNTY

Mark DeSaulnier
Erling Horn
Mark Ross
Gayle Uilkema
(Secretary)

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).

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Chris Daly
Jake McGoldrick
Gavin Newsom

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.

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY

Erin Garner
Liz Kniss
Patrick Kwok
Julia Miller

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.

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

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.

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

The District received a comment letter from your consultant, EMCON/OWT, Inc., on November 19, 2004. Mr. Paul Stout provided two comments on the proposed permit. First, he requested a revision of the proposed Condition # 18773, Part 11 for the gas turbines. The District had proposed to add a requirement to test the turbines at four loads to the existing annual source testing requirement. The basis for this requirement

was 40 CFR 60.335(b)(2), which requires that performance tests be conducted at four loads. Mr. Stout stated that the 40 CFR 60.8 performance test requirement was an initial test requirement and that the revised NSPS did not require additional or on-going testing. Upon further review of the July 8, 2004 Federal Register notice, the District agrees that EPA did not intend to require new monitoring requirements for existing turbines that were operating prior to the July 8, 2004 amendments. Since the turbines are typically operated at full load and the NSPS does not require additional monitoring, the District agrees to remove the requirement to test each turbine at four loads. The existing annual source testing requirement (at maximum operating conditions) and the existing requirements to continuously monitor fuel consumption, water-to-fuel ratio, and temperature are adequate for demonstrating compliance with all applicable emission limits. Condition # 18773, Part 11 will be revised in the final permit as indicated below.

11. In order to demonstrate compliance with Regulations 8-34-301.4, 8-34-412, 8-34-509, and 9-9-301.1; Parts 1, 2, and 8 above; and 40 CFR 60.332(a)(2); the Permit Holder shall ensure that a District approved source test is conducted annually on each Gas Turbine (S-6 and S-7). ~~The annual source test shall be conducted at the four loads (30%, 50%, 75%, and 90%-100% of full load, ± 5%) specified in 40 CFR 60.335(b)(2).~~ The annual source test shall determine the following ~~(for each test load)~~:

Mr. Stout's second comment concerned the throughput limit for the S-99 Gasoline Dispensing Facility. Mr. Stout requested that the throughput limit in Condition # 20813, Part 1 be increased to 30,000 gallons per year based on a December 9, 2003 request from the facility. This request was processed pursuant to Application 2653, and the District approved a throughput revision for S-99 on July 9, 2004. No changes will be made to the final permit based on this comment, because S-99 was not the subject of the above proposed significant revision. However, the associated MFR permit revision for Application # 2653 is being prepared. The District expects to propose a revision to the MFR permit concerning S-99 in December 2004.

The District has decided to issue the revised permit incorporating the proposed minor revisions, the proposed significant revision, and the revision to Condition # 18773, Part 11 noted above.

Enclosed is a copy of the final revised permit. If you have any questions regarding this permit, please call Carol Allen, Senior Air Quality Engineer, at (415) 749-4702.

Sincerely yours,

Jack P. Broadbent
Executive Officer / APCO

Enclosure: Final MFR Permit for Site # A2066

JPB:BFB:CSA

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