

October 4, 2005

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

Dear Ms. Jordan:

The District has completed the evaluations of the following applications for Changes of Conditions for the S-2 Altamont Landfill located at Site # A2066: Application # 11126 for an Administrative Amendment of a Major Facility Review Permit and Application # 9527 for a Significant Revision to a Major Facility Review Permit.

**ALAMEDA COUNTY**  
Roberta Cooper  
Scott Haggerty  
Nate Miley  
Shelia Young

**CONTRA COSTA COUNTY**  
Mark DeSaulnier  
Mark Ross  
(Secretary)  
Michael Shimansky  
Gayle B. Uilkema  
(Vice-Chairperson)

Application Numbers	Facility Number	Facility Name	Address, City	Type of Operation
11126 and 9527	A2066	Waste Management of Alameda County	10840 Altamont Pass Road, Livermore, CA 94550	Solid Waste Landfill

**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  
(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**

This is to advise you that the Bay Area Air Quality Management District is issuing an administrative amendment to the Major Facility Review Permit for Waste Management of Alameda County (Facility Number A2066) pursuant to Application # 11126.

The purpose of this amendment is to modify several non-federally enforceable landfill gas concentration limits for toxic air contaminants (TAC) contained in Condition # 19235, Part 12 and Table VII-A. Application # 11126 incorporates revised emission calculation procedures and results in new emission limits at the landfill gas combustion equipment (S-6, S-7, S-23, S-24, and A-15) for the compounds listed in Part 12 and for secondary pollutants including formaldehyde, PAHs, hydrogen bromide, hydrogen chloride, and hydrogen fluoride. While the emission limits for a few individual HAPs (specifically: benzyl chloride; 1,1,2,2 tetrachloroethane; and hydrogen chloride) will increase, total HAP emissions from the landfill gas combustion equipment will be 0.23 tons per year lower than the previously calculated total HAP emission rate. Since this action involves modifying only non-federally enforceable permit conditions, the revision of the MFR Permit pursuant to Application # 11126 is being handled as an administrative amendment. In addition to the changes discussed above, the District is correcting the web site address for SIP requirements in Section XII of the MFR Permit.

In addition, the District has completed the evaluation of Application # 9527. The purpose of this revision is to allow an alternative monitoring procedure that will demonstrate compliance with the Regulation 8-2-301 total carbon limits, which apply to VOC-laden soil handling activities at the S-2 Altamont Landfill. Incorporation of the proposed alternative monitoring procedures will require permit condition revisions and a permit shield that will replace the Regulation 8-2-601 stack testing procedures with the Regulation 8-40-604 fugitive emission monitoring procedures. The proposed alternative monitoring procedures do not relax the frequency of the required monitoring. This application will not result in any emission increases.

The District has made a preliminary decision to issue the Change of Conditions and the Significant Revision to the Major Facility Review permit pursuant to Application # 9527, but the final decision on the permit issuance will consider public and EPA comments on this

preliminary decision. The notice inviting written public comments will be published in the Tri-Valley Herald. The final date for comments is November 23, 2005.

All permit revisions are clearly shown in strikeout and underline formatting in the proposed permit. Section X of the permit describes the proposed revisions in more detail.

Enclosed for your information is a copy of the proposed permit and the evaluation evaluations/statement of bases. If you have any questions regarding this project, please call Steve A. Hill, Permit Evaluation Manager, at (415) 749-4673, fax (415) 749-5030.

Very truly yours,

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Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

SAH:CSA:myl

Enclosures: Proposed MFR Permit for Site # A2066  
Engineering Evaluation and Statement of Basis for Application # 9527  
Engineering Evaluation and Statement of Basis for Application #11126

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