

July 15, 2004

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

Re: **TriCities Waste Management – Facility # A2246**

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Dear Ms. Jordan:

The District has reopened the following Major Facility Review (MFR) Permit:

CONTRA COSTA COUNTY

Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

Application	Facility #	Facility Name	Address, City	Type of Operation
8916 and 3515	A2246	TriCities Waste Management	7010 Auto Mall Parkway Fremont, CA 94538	Landfill Operations

MARIN COUNTY

Harold C. Brown, Jr.

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Willie Brown, Jr.
Chris Daly
Jake McGoldrick

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 purpose of this reopening is to add the requirements related to the NESHAP for Municipal Solid Waste Landfills (40 CFR 63, Subpart AAAAA) that was promulgated on January 16, 2003. Reopening this permit is required by Regulation 2, Rule 6 and by EPA's Title V regulations, because the expiration date for the permit is more than three years from the date of promulgation of the standard. The following specific changes are proposed pursuant to the reopening action:

- Add MSW Landfill NESHAP requirements to Tables IV-A and VII-A.
- Revise Condition # 8366 and Table IV-A by adding Part 17. This part requires semi-annual reports pursuant to the above NESHAP requirements and allows these reports to be combined with the Title V semi-annual monitoring reports.

Administrative amendments and proposed minor revisions that were requested by this facility pursuant to Application # 8916 have been combined with the above reopening action. The following specific changes are proposed pursuant to Application # 8916:

- Correct contact information on the title page.
- Correct collection system description in Table II-A and Condition # 8366, Part 2. Clarify the number of wells remaining on Authority to Construct.

The District is also proposing other administrative amendments and minor revisions to this permit in order to update citations and dates based on SIP approvals and other regulatory changes, correct errors, and clarify language. The District proposes the following specific changes:

- Update standard language in Sections I, III, and VIII.
- Correct regulatory references and amendment dates and delete outdated SIP requirements in Section I, Tables III, IV-A, IV-D, VII-A, VII-D, and VIII, and Condition # 8366, Parts 8 and 17.

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

- Expand the description of A-2 in Table II-B and delete references to obsolete limits.
- Add several recently identified generally applicable regulations to Table III. Move Regulation 8-40-116 and 117 from Tables IV-A and VII-A to Table III.
- Add several applicable requirements that were missing from Tables IV-A and VII-A including Regulations 6-310 and 8-34-501.3, and 40 CFR 60.752(b)(2)(iii)(B), 60.756(b)(1), and 60.758(b)(2)(i-ii) for the flare and Regulations 8-34-304.4 and 8-34-408.2 for the landfill.
- Revise Condition # 8336, Part 6 for consistency with MFR permit revision procedures in Regulation 2, Rule 6.
- Correct an applicable requirement in Tables IV-C, VII-C, and VIII and the associated basis for Condition # 17860, Part 2. The S-9 Portable Diesel Engine is subject to Regulation 6-303 and not 6-301, because the engine displacement is less than 1500 in³.
- Reword the condition bases for several parts in Condition #8366, #15022, and #17860 and in Tables IV-A, IV-B, and IV-C.
- In Table VIII, add an alternative test method for BAAQMD Regulation 6-310, Particle Weight Limitation; add missing test method references for Condition # 8366, Part 8; and correct an erroneous reference for Condition # 8366, Part 15.
- Update and correct Section X Revision History.
- Add and correct several terms in the Section XI Glossary.

None of the proposed revisions will result in any emission changes at this facility. All changes to the permit are clearly shown in strikeout/underline format.

The final permit will address public and EPA comments on this preliminary decision. The notice inviting written public comments will be published in the Inter-City Express. The final date for comments is August 27, 2004.

A copy of the proposed Major Facility Review Permit and permit evaluation/statement of basis is enclosed for your information. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Very truly yours,

Jack P. Broadbent
Executive Officer/
Air Pollution Control Officer

JPB:BFB:mcl

Enclosures

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