

November 1, 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:

The requirement for public and EPA review of the proposed reopening of a Major Facility Review Permit for the facility identified below has been completed:

CONTRA COSTA COUNTY

Mark DeSaulnier
Erling Horn
Mark Ross
Gayle Uilkema
(Secretary)

Plant	Plant Name	Applications	Permit Engineer	City	County
A2246	TriCities Waste Management	8916, 10390	T. Hull	Fremont	Alameda

MARIN COUNTY

Harold C. Brown, Jr.

The District proposed a reopening of the MFR permit for this facility commencing on May 2, 2004. This reopening was required to incorporate the MSW Landfill NESHAP requirements (40 CFR Part 63, Subparts A and AAAA) that were promulgated by EPA on January 16, 2003 and related permit condition revisions. In addition, the District proposed administrative amendments and minor revisions to this permit to correct title page information, update citations and dates based on SIP approvals and other regulatory changes, correct errors, and clarify language. The changes to the permit are described in detail in Section X Revision History of the MFR Permit.

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Chris Daly
Jake McGoldrick
Gavin Newsom

SAN MATEO COUNTY

Jerry Hill
Marland Townsend
(Vice-Chairperson)

The proposed revisions did not result in any emission increases.

No comments on these proposed revisions were received from EPA or the public. The facility submitted comments requesting minor changes as follows:

SANTA CLARA COUNTY

Erin Garner
Liz Kniss
Patrick Kwok
Julia Miller

SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith
Pamela Torliatt

1. Change the responsible official from Mike Crosetti, District Manager to James Devlin, North Bay Market Manager.
2. Correct the number of permitted vertical gas collection wells listed in Table II-A and Permit Condition #8366, Part 2 from 55 to 25 to reflect recent District permitting activities.
3. Synchronize the reporting requirements for the Regulation 8, Rule 34 Annual Report, and the NESHAP Subpart AAAA Semi-Annual Reports with the Title V Semi-Annual Reports required by Section I.F. to eliminate the need for duplicate submittal of overlapping reports.
4. Add newly permitted Diesel IC Engines S-14, S-15, S-16, and S-17 to the Title V permit.

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

In response to the above comments, the District has made additional revisions to the proposed permit as follows:

- The Responsible Official for this site was changed to Mr. James Devlin as requested by the facility.
- The number of gas collection wells in Table II-A and Permit Condition #8366, Part 2 was changed to 25.
- Condition #8366, Part 17, which was included as a revision in the proposed permit, adequately addresses the synchronization of reporting to eliminate the need for overlapping reports. No further action was taken.
- The Diesel IC Engines S-14, S-15, S-16, and S-17 were added to the source list for the facility under BAAQMD Application #8278 due to a loss of exemption from permits. However, since they were not included in the proposed permit, and their incorporation would not be an administrative amendment, they were not added to the Title V permit at this time. They will be added to the Title V permit in a separate revision

In addition, the District has added a Custom Schedule of Compliance to the permit to address a temporary non-compliance situation that will occur during the use of a temporary landfill gas flare. This period of non-compliance is covered by an Enforcement and Compliance (E&C) Agreement between the District and Tri-Cities Waste Management, effective 08/26/04 to 12/03/04 (see attached). The E&C Agreement is the basis for the Custom Schedule of Compliance. Progress reports are not required for the Custom Schedule because the duration is less than 6 months.

Enclosed for your information is a copy of the final permit. 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 Peter Hess for
Jack P. Broadbent
Executive Officer / APCO

Enclosures: Final MFR Permit for Site # A2246
Enforcement and Compliance Agreement

BFB:SAH:rth

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