

June 17, 2003

Mr. Jim Gunderson
Browning-Ferris Industries of CA, Inc.
12310 San Mateo Road
Half Moon Bay, CA 94019

Re: **Browning-Ferris Industries of CA, Inc. – Facility #A2266**
Minor Revision

Dear Mr. Gunderson:

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review Permit for Browning-Ferris Industries of CA, Inc. (Facility Number A2266), pursuant to Application # 4801, and is submitting the permit to EPA for review.

The main purpose of these revisions is to add a source (S-12 Stockpiles of Green Waste) that was mistakenly omitted from the initial MFR Permit for this site. An MFR Permit Application (Application # 4801) for this source was submitted to the District on April 3, 2002. From the Engineering Evaluation Report in Permit Application # 13951, this source has maximum potential emissions of 0.12 tons/year of PM₁₀. In accordance with BAAQMD Regulations 2-6-201, 2-6-215 and 2-6-226, adding this source is not a major modification pursuant to NSR or PSD, and therefore this action constitutes a minor permit revision. The permit conditions for this source (Condition # 16315) are being revised by adding (a) a basis for each part of this condition, (b) specific yard and green waste throughput limits, (c) a requirement to visually observe the source during loading and unloading operations to assure compliance with BAAQMD Regulation 6-301, and (d) record keeping requirements to assure compliance with throughput limits and watering requirements. Visual monitoring of S-12 during loading and unloading operations and the watering requirements in Condition # 16315, Part 2 will ensure compliance with the Regulation 6-301 Ringelmann 1 limit, because particulate emissions will be visible before the Ringelmann 1 limit is exceeded. This source is expected to comply with all applicable requirements.

In Application # 4801, you initially requested to add two other sources to the MFR Permit (S-13 Tub Grinder and S-14 Diesel Engine). However, these sources have been permanently removed from this site and no longer have District permits. As a result, an MFR Permit for S-13 and S-14 is not necessary.

In addition to adding S-12, the District is revising this permit to incorporate amendments to the SIP, amendments to District Rules and Regulations, and new applicable requirements related to the NESHAPS for MSW Landfills. The District is also adding minor clarifications to the flare requirements listed in Table II-B and is making several administrative changes.

Specifically, the following changes have been made to the permit:

- Correct and update regulatory dates in Sections I. and III.
- Add S-12 Stockpiles of Green Waste to Table II-A, and add Tables IV-C and VII-C for S-12.
- Revise Condition # 16315 for S-12 to add bases, throughput limits, visual monitoring requirements, and record keeping requirements.

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- Clarify capacities and operating requirements for flares in Table II-B.
- Updates Tables IV-A, IV-B, IV-D, VII-A, VII-B, VII-D, and VIII and delete Condition # 10164, Part 33 to reflect EPA's adoption of BAAQMD Regulation 8, Rules 5, 7, 34, and 40 into the SIP and BAAQMD's subsequent adoption of amendments to Regulation 8, Rules 5 and 7.
- Incorporate NESHAP requirements for MSW Landfills into Tables IV-A, IV-D, VII-A, VII-D and Condition # 10164, Part 33.
- Add new terms to Section XI.

All changes are clearly shown in strikeout/underline format.

The District will issue the permit after the EPA 45-day review period is over and after addressing any EPA comments.

A copy of the proposed revisions to the Major Facility Review Permit is enclosed for your information. If you have any questions on this matter, please call **Carol Allen, Senior Air Quality Engineer, at (415) 749-4702.**

Very truly yours,

William C. Norton
Executive Officer/Air Pollution Control Officer

WCN:WDB:csa

CC: Lochlin Caffey, Environmental Manager, BFI of CA, Inc.

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