

January 12, 2007

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

Dear Ms. Jordan:

**ALAMEDA COUNTY**  
Tom Bates  
Scott Haggerty  
Janet Lockhart  
Nate Miley

This is to advise you that the Bay Area Air Quality Management District is proposing a Significant Revision and a Minor Revision of the Major Facility Review (MFR) Permit for Facility # A2266.

**CONTRA COSTA COUNTY**  
John Gioia  
Mark Ross  
(Vice-Chair)  
Michael Shimansky  
Gayle B. Uilkema  
(Chair)

Application Number	Facility Number	Facility Name	Address, City	Type of Operation
14066	A2266	Browning-Ferris Industries of CA, Inc.	12310 San Mateo Road, Half Moon Bay, CA 94109	Active 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  
(Secretary)  
Carol Klatt

**SANTA CLARA COUNTY**  
Erin Garner  
Yoriko Kishimoto  
Liz Kniss  
Patrick Kwok

**SOLANO COUNTY**  
John F. Silva

**SONOMA COUNTY**  
Tim Smith  
Pamela Torliatt

Jack P. Broadbent  
**EXECUTIVE  
OFFICER/APCO**

The main purpose of the proposed significant revision (Application # 14066) is to establish an alternative wellhead oxygen standard for landfill gas collection wells associated with the S-1 Los Trancos Canyon Landfill. District Regulation 8, Rule 34 and the NSPS for MSW Landfills allow the District to establish site-specific wellhead limits in lieu of the default wellhead limits stated in the regulations, provided the site-specific alternative wellhead limits do not result in subsurface fires or inhibit anaerobic decomposition of the refuse. The District has determined that a proposed alternative oxygen standard of 15% O<sub>2</sub> by volume is appropriate for twenty-five gas collection wells, as long as this alternative limit does not result in surface emission leaks near the vicinity of these wells. The District is proposing to identify the alternative wellhead oxygen limit, the applicability criteria, the monitoring and record keeping requirements, and other procedures related to the alternative oxygen standard in Condition # 10164, Part 18b and in Tables IV-A, VII-A, and VIII. The District is also proposing a minor revision to this MFR permit that will update the description of the landfill gas collection system components and authorize the installation of new collection system components. This application will not result in any emission increases.

The statement of basis for Application # 14066 contains a detailed explanation of all proposed permit revisions. All proposed permit revisions are clearly shown in ~~strikeout~~ and underline formatting in the proposed permit and are summarized in Section X of the proposed permit.

The District has made a preliminary decision to issue these revisions to the Major Facility Review Permit, 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 San Mateo County Times. The final date for comments is February 23, 2007.

Enclosed for your information is a copy of the proposed permit, the statement of basis for Application # 14066, the permit to operate report for Application # 12497, the engineering evaluation for Application # 14976, and the engineering evaluation for Application # 13933. If you have any questions regarding this project, please call Dennis Jang, Senior Air Quality Engineer, at: (415) 749-4707, fax (415) 749-5030.

Very truly yours,

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Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

Enclosures: Proposed MFR Permit for Site # A2266  
Statement of Basis for Application # 14066  
Permit to Operate Report for Application # 12497  
Engineering Evaluation for Application # 14976  
Engineering Evaluation for Application # 13933

JB:BFB:myl