

January 6, 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:

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 City of Palo Alto Landfill, Facility Number A2721, and is submitting the permit to EPA for review.

**CONTRA COSTA COUNTY**

Mark DeSaulnier  
Mark Ross  
Gayle Uilkema  
(Secretary)

The main purpose of this permit revision is to modify the landfill gas collection system to include additional collection wells. These additional wells are expected to improve the gas collection rate from the landfill and prevent excess emissions. In addition, the permit conditions are being revised to incorporate new source test data for the flare and to make other minor and administrative permit corrections. None of these changes will result in emission increases. In accordance with BAAQMD Regulations 2-6-201, 2-6-215 and 2-6-226, this permit revision is not a major modification pursuant to NSR or PSD, and therefore this action constitutes a minor permit revision. The S-1 Palo Alto Landfill and A-3 Landfill Gas Flare are expected to comply with all applicable requirements.

**MARIN COUNTY**  
Harold C. Brown, Jr.

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
Willie Brown, Jr.  
Chris Daly  
Jake McGoldrick

The following changes have been made to the permit:

- Corrected a date in Section I.B.1.
- Revised the minimum flare temperature in Condition # 1028, Part 9 and Tables II-B and VII-A based on new source test data.
- Corrected the peak waste disposal limit in Condition # 1028, Part 1a and Tables II-A and VII-A based on the existing Solid Waste Facility Permit for the landfill.
- Added text to Condition # 1028, Part 7 that describes the proposed vertical wells for which that the District is planning to issue an Authority to Construct.
- Corrected typographical errors in Condition # 1028, Part 12 and Table VII-A.
- Added Section X Revision History and revised subsequent section numbers.

**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

All changes are clearly shown in strikeout/underline format.

Jack Broadbent  
**EXECUTIVE OFFICER/APCO**

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 and the engineering evaluation for application number 2230 are enclosed for your information. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Sincerely,

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Jack Broadbent  
Executive Officer/Air Pollution Control Officer

JB:VML:myl

**Enclosures:**

Engineering Review of Application # 2230  
Proposed MFR Permit for Site # A2721

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