

August 28, 2007

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

Subject: Administrative Amendment to the Major Facility Review Permit for Facility #A2721

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is issuing an administrative amendment to the Major Facility Review Permit for City of Palo Alto Landfill (Facility #A2721). The purpose of this amendment is to make the following three non-substantive changes to the permit

Permit condition 1028, part 5, will be modified to show that landfill gas from plant A2721 can be combusted at A-1 and sludge incinerators (S-1 and S-2) at plant A0617 instead of S-1 and S-2 IC Engines at plant A9794 since plant A9794 has closed.

5. All collected landfill gas shall be vented to the properly operating Landfill Gas Flare (A-3) or to the ~~IC Engines (S-1 and S-2 at Site # A9794)~~ sludge incinerators (S-1 and S-2) as supplemental fuel at site #A0617 Palo Alto Regional Water Quality Control Plant. ~~If the IC engines at Site # A9794~~ sludge incinerators at site #A0617 are not operating, all collected landfill gas shall be vented to the A-3 Landfill Gas Flare. ~~If one or both of the IC engines at Site #9794 are operating, any~~ Any amount of collected landfill gas that exceeds the capacity of the operating sludge incinerators at Site #A0617 shall be vented to the flare.

The "Description of Requirement" for regulations 8-34-301.4, 8-34-501.11, and 8-34-509 in "Table IV-A Source Specific Applicable Requirements" will be modified to reflect the venting of landfill gas to facility A0617 instead of A9794:

Table IV – A
Source-Specific Applicable Requirements
S-1 PALO ALTO LANDFILL WITH GAS COLLECTION SYSTEM;
AND A-3 LANDFILL GAS FLARE

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-34-301.4	Limits for Other Emission Control Systems (Permit Holder shall ensure that Facility # A9794 <u>A0617</u> will comply with this requirement whenever landfill gas is vented to the IC Engines <u>sludge incinerators: S-1 or S-2 at Facility # A9794 <u>A0617</u></u>)	Y	

ALAMEDA COUNTY
Tom Bates
Scott Haggerty
Janet Lockhart
Nate Miley

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

MARIN COUNTY
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Jerry Hill
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Yoriko Kishimoto
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Patrick Kwok

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt
(Secretary)

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Table IV – A
Source-Specific Applicable Requirements
S-1 PALO ALTO LANDFILL WITH GAS COLLECTION SYSTEM;
AND A-3 LANDFILL GAS FLARE

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-34-501.11	Records of Key Emission Control System Operating Parameters (Permit Holder shall ensure that Facility # A9794 <u>A0617</u> will comply with this requirement whenever landfill gas is vented to the IC Engines <u>sludge incinerators</u> : S-1 or S-2 at Facility # A9794 <u>A0617</u>)	Y	
8-34-509	Key Emission Control System Operating Parameter(s) (Permit Holder shall ensure that Facility # A9794 <u>A0617</u> will comply with this requirement whenever landfill gas is vented to the IC Engines <u>sludge incinerators</u> : S-1 or S-2 at Facility # A9794 <u>A0617</u>)	Y	

Permit Condition #1028, part 7b will be deleted because authority to construct #2230 has expired.

7b. Permit Holder has been issued an Authority to Construct for the landfill gas collection system modifications described below. Well and collector locations, depths, and lengths are as described in detail in Permit Application # 2230.

	<u>Minimum</u>	<u>Maximum</u>
Vertical Wells	5	22

Wells installed pursuant to subpart b shall be added to subpart a in accordance with the procedures identified in Regulation 2-6-414 or 2-6-415. The Permit Holder shall maintain records of the initial operation date for each new well.

This amendment is not subject to EPA review or public comment and is effective immediately.

The amended Major Facility Review Permit can be viewed or downloaded on the District website at http://www.baaqmd.gov/pmt/title_v/public_notices.htm. We will also send the permit to you via the Electronic Permit Submittal System. If you have any questions on this matter, please call Barry Young, Air Quality Engineering Manager, at (415) 749-4721.

Sincerely,

Signed by Jack P. Broadbent
 Jack P. Broadbent
 Executive Officer/Air Pollution Control Officer

JPB:ICS