

July 30, 2003

City of Mountain View
P. O. Box 7540
Mountain View, CA 94039

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Attention: Mr. Kevin Duggan
City Manager

Application Number: 2620
Plant Number: A2740
Equipment Location: 2600 Shoreline Boulevard
Mountain View, CA 94043

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

Dear Mr. Duggan:

MARIN COUNTY
Harold C. Brown, Jr.

The requirement for public and EPA review of the proposed Major Facility Review Permit has been completed. No comments were received from the public or EPA.

NAPA COUNTY
Brad Wagenknecht

The District has received your comments on the draft Major Facility Review (MFR) Permit for your facility identified above that were submitted by email on June 23, 2003 from Mr. John Welbourn, Environmental Engineering Manager.

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

The purpose of this letter is to issue the permit as of the date of this letter, respond to your facility's comments, and to notify you of other changes and corrections made to the final MFR Permit for your site.

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Vice-Chairperson)

Response to Comments on the Lists of Wells Subject to Alternative Wellhead Limits:

SANTA CLARA COUNTY
Liz Kniss
Julia Miller
Dena Mossar
(Vacant)

Mr. John Welbourn requested several additions and corrections to the lists of wells that are subject to alternative wellhead limits (Condition # 16065, Part 5). The final MFR has been revised to include these additions and corrections. The revisions that have been made to Condition # 16065, Part 5 are identified below in strike-out and underline format.

SOLANO COUNTY
John F. Silva

Condition # 16065

SONOMA COUNTY
Tim Smith
Pamela Torliatt

FOR: S-1, LANDFILL AND GAS COLLECTION SYSTEM; A-3, LANDFILL GAS FLARE; A-4, LANDFILL GAS FLARE; AND A-5, LANDFILL GAS FLARE;

William C. Norton
EXECUTIVE
OFFICER/APCO

5. The gas collection system operating requirements listed below shall replace the well head requirements identified in Regulation 8-34-305.2 through 8-34-305.4 for the specified wells and collectors. All wells and collectors remain subject to the Regulation 8-34-305.1 requirement to maintain vacuum on each well head. In addition, part 5c clarifies the applicable limits for vaults containing gas collection system components. (Basis: Regulations 8-34-301.2, 8-34-303, and 8-34-305)

- a. The Regulation 8-34-305.2 temperature limit shall not apply to the wells listed below. The landfill gas temperature in each of the wells listed below shall not exceed 140 degrees F.

Vista Landfill: VE-6, VE-9, VF-3, VF-11, VG-3, VG-3A, VG-4, VH-4, VH-5, VH-10, VJ-3, and VJ-4 (12 wells)

544-Acre Landfill: NEA-08 (1 vertical well)

- b. The Regulation 8-34-305.3 nitrogen concentration limit and the Regulation 8-34-305.4 oxygen concentration limit shall not apply to the wells listed below, provided that the oxygen concentration in the landfill gas at the main header does not exceed 5% O₂ by volume (dry basis) and the methane concentration in the landfill gas at the main header is not less than 35% CH₄ by volume (dry basis). The permit holder shall monitor the landfill gas from the main header for oxygen and methane on a monthly to demonstrate compliance with this part.

Crittenden Landfill: CRA-1, CRA-2R, CRA-3, CRA-4, CRA-5R, CRA-6, CRA-7, CRA-8, CRA-9, CRA-10, CRA-13, CRB-1, CRB-2, CRB-3, CRB-4, CRB-5, CRB-6, CRB-7R, CRB-8, CRD-1, CRD-3, CRD-5, CRD-8, CRD-9, CRD-10, and CRD-11 (26 vertical wells)

Vista Landfill: VA-HZ, VA-1, VA-01A, VA-2, VA-3, VA-3A, VA-4, VB-1, VB-2R, VB-3A, VB-4, VB-5R, VB-5A, VB-6, VB-7, VB-8, VC-1, VC-2, VC-3, VC-5, VC-6, VC-7, VC-8, VE-1, VE-4R, VE-5, VE-6, VE-7, VE-8, VE-9, VE-10, VF-1, VF-2, VF-4, VF-5R, VF-7, VF-8R, VH-3, VJ-2R, VJ-3R, VJ-4A, VJ-4R, VJ-5R, VJ-6, VJ-7R, VJ-8R, VJ-9R, VJ-10, VJ-11R, VK-3, VK-4, VK-5 (1 horizontal collector and 51 vertical wells)

544-Acre Landfill: WA-1, WA-5, WA-6, WA-8, WA-9, WA-13, WA-14, WA-16, WA-18, WA-19, WA-20, WA-21, WA-22, WA-25, WA-26, WA-27, WA-28, WA-29, WB-1, WB-2, WB-3, WB-4, WB-5, WB-5A, WB-6, WB-6A, WB-7, WB-7A, WB-8, WB-9, WB-10, WB-11, WB-12, WB12-A, WB-16, WB-17, WD-3, WN-1, WN-2, WN-3R, WN-4, WN-4A, WN-5, WN-6, WN-7, WN-8, WN-9, WN-10, WN-11, WN-12, WN-13 (~~50~~51 vertical wells)

A-16, B-2, B-3, B-20, B-24, B-28, Y-01, Y-02, Y-03, Y-04, Y-05, Y-06, LE-1, LE-2,

LE-3, LE-4, FHZ-1, FHZ-2, FHZ-3, FHZ-4, FHZ-5, and MPHZ (6 horizontal collectors and 16 vertical wells)

NEA-01, NEA-02, NEA-03, NEA-04, NEA-05, NEA-06, NEA-07, NEA-08, NEA-09, NEA-11, NEA-13, NEA-15, NEA-16A, NEB-01, NEB-02, NEB-03, NEB-04, NEB-05, NEB-06, NEB-08, NEB-10, NEB-11, NEB-12, NEB-13, NEC-01, NEC-02, NEC-03, NEE-02, NEE-03, NEE-04, ~~and NEE-05~~, and NEE-06 (~~30~~32 vertical wells)

As discussed verbally with Mr. Welbourn, the above lists of wells that are subject to alternative wellhead limits (Condition # 16065, Part 5) cannot be changed administratively, because this type of permit condition change is not identified as an Administrative Permit Amendment in Regulation 2-6-201, which states:

2-6-201 Administrative Permit Amendment: A non-substantive amendment to a major facility review permit. The following amendments are administrative amendments: changes in recordkeeping format that are not relaxations of applicable requirements, the correction of typographical errors, changes in permit format that are not alterations of applicable requirements, changes in source descriptions that are not alterations of applicable requirements, changes in the descriptions of applicable requirements that add detail but do not affect substantive requirements, deletion of requirements containing sunset dates that have passed, the identification of administrative changes at a facility (such as a replacement of the facility's responsible official or a change in ownership or operational control of the facility which involves no physical or operational changes to the facility), the deletion of sources, the approval of a District rule into the SIP, the imposition of more frequent emission monitoring requirements, and changes to applicable requirements and related monitoring that are not federally enforceable.

(Amended 10/20/99, 4/16/03)

Correction to the CO Emission Limit for the A-3 Flare:

As indicated in the District's May 28, 2003 letter concerning Application # 7430, the District approved your request for an increase of the CO emission limit for the A-3 Flare. The new CO emission limit is now consistent with the CO emission limits for the other flares at this site (A-4 and A-5). In addition, the new CO emission limit satisfies the Regulation 2-2-112 requirement to use Reasonable Available Control Technology (RACT) for the control of secondary pollutant emissions from abatement devices. The revisions that have been made to Condition # 16065, Part 10, Table IV-A, and Table VII-A are identified below in strike-out and underline format.

Condition # 16065

FOR: S-1, LANDFILL AND GAS COLLECTION SYSTEM; A-3, LANDFILL GAS FLARE; A-4, LANDFILL GAS FLARE; AND A-5, LANDFILL GAS FLARE;

10. Carbon monoxide (CO) emissions from the flares shall not exceed the concentration limits listed below. (Basis: Cumulative Increase and RACT)
 - a. For A-3: ~~2483~~ ppmv of CO, corrected to 15% oxygen, dry basis.
 - b. For A-4: 83 ppmv of CO, corrected to 15% oxygen, dry basis.
 - c. For A-5: 83 ppmv of CO, corrected to 15% oxygen, dry basis.

**Table IV – A [excerpt]
Source-Specific Applicable Requirements
S-1 LANDFILL AND GAS COLLECTION SYSTEM,
A-3 LANDFILL GAS FLARE,
A-4 LANDFILL GAS FLARE, AND
A-5 LANDFILL GAS FLARE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Condition # 16065			
Part 10	CO emission limits for flares (Cumulative Increase and RACT)	Y	

**Table VII – A [excerpt]
Applicable Limits and Compliance Monitoring Requirements
S-1 LANDFILL AND GAS COLLECTION SYSTEM,
A-3 LANDFILL GAS FLARE,
A-4 LANDFILL GAS FLARE, AND
A-5 LANDFILL GAS FLARE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
CO	BAAQMD Condition # 16065, Part 10a	Y		≤ 21 ppmv, at 15% O ₂ , dry basis (applies to A-3 Flare only)	BAAQMD Condition # 16065, Parts 13 and 15e	P/A	Source Tests and Records
CO	BAAQMD Condition # 16065, Part 10ab-c	Y		≤ 83 ppmv, at 15% O ₂ , dry basis (applies to A-3, A-4, and A-5 Flares only)	BAAQMD Condition # 16065, Parts 13 and 15c	P/A	Source Tests and Records

Other Corrections:

The amendment date for Regulation 2, Rule 6, on page 3 of the permit has been updated as shown below.

Excerpt from Section I.A:

BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review
(as amended by the District Board on 5/2/04/16/03).

The regulations and part numbers referenced in Condition # 16065, Parts 7 and 15 have been corrected as shown below.

7. The combustion zone temperature of each flare (A-3, A-4, and A-5) shall be maintained at a minimum of 1400 degrees F, averaged over any three-hour period. If a source test demonstrates compliance with all applicable requirements at a different temperature, the APCO will revise the minimum combustion zone temperature limit in accordance with the procedures identified in Regulations ~~2-6-406~~2-6-414 or 2-6-415 and the following criteria. The minimum combustion zone temperature for a flare shall be equal to the average combustion zone temperature measured during the most recent complying source test minus 50 degrees F, provided that the minimum combustion zone temperature shall not be less than 1400 degrees F. (Basis: Toxic Risk Management Policy and Regulation 8-34-301.3)

15. In order to demonstrate compliance with the above conditions, the Permit Holder shall:
 - a. Maintain an accurate map of the landfill that indicates the locations of all refuse boundaries and the locations of all wells and collectors (using unique identifiers) that are required to be operating continuously pursuant to Part 4a;
 - b. Record the initial startup date for any new wells or collectors ~~installed in accordance with 4b-c~~;
 - c. Maintain records of all test dates and test results performed to maintain compliance with Parts 12-14 above, Regulations 8-34-301, 8-34-303, 8-34-305, 8-34-412, 8-34-414, and 8-34-415, or any other applicable rule or regulation.

All records shall be maintained on site in an APCO approved logbook or shall be made readily available to District staff upon request for a period of at least 5 years from the date of entry. These record keeping requirements do not replace the record keeping requirements contained in any applicable rules or regulations. (Basis: Cumulative Increase and Regulations 2-1-301, 2-6-501, 8-34-301, 8-34-303, 8-34-305, 8-34-412, 8-34-414, 8-34-415, 8-34-501, 8-34-503, 8-34-505, 8-34-506, and 9-1-302)

The report dates identified in Condition # 16065, Part 16 have been corrected as shown below.

Condition # 16065

FOR: S-1, LANDFILL AND GAS COLLECTION SYSTEM; A-3, LANDFILL GAS FLARE; A-4, LANDFILL GAS FLARE; AND A-5, LANDFILL GAS FLARE;

16. The annual report required by BAAQMD Regulation 8-34-411 shall be submitted in two semi-annual increments. The reporting period for the first increment of the Regulation 8-34-411 annual report that is submitted subsequent to the issuance of the MFR Permit for this site shall be from December 1, 2002 through ~~last day~~

~~of the month that is 6 months after MFR Permit issuance date~~December 31, 2003. This first increment report shall be submitted by ~~last day of the month following the end of the reporting period~~January 31, 2004. The reporting periods and report submittal due dates for all subsequent increments of the Regulation 8-34-411 report shall be synchronized with the reporting periods and report submittal due dates for the semi-annual MFR Permit monitoring reports that are required by Section I.F. of the MFR Permit for this site. (Basis: Regulation 8-34-411 and 40 CFR Part 63.1980(a))

The District has made a decision to issue the Major Facility Review Permit.

Enclosed for your information are the transmittal letters to EPA and ARB and a copy of the final MFR Permit.

Please note that the first monitoring report for this permit will be due on January 31, 2004, and the first compliance certification will be due on July 31, 2004.

If you have any questions regarding this project, please call Carol Allen, Senior Air Quality Engineer, at (415) 749-4702, fax: (415) 749-4949, or email: callen@BAAQMD.gov.

Very truly yours,

William C. Norton
Executive Officer/Air Pollution Control Officer

WCN:WDB:csa

CC: John Welbourn, City of Mountain View
EPA
CARB

Enclosure

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