

Bay Area Air Quality Management District

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Permit Evaluation and Statement of Basis

MAJOR FACILITY REVIEW PERMIT ADMINISTRATIVE AMENDMENT

for
City of Santa Clara
Facility #A3464

Facility Address:
5401 Lafayette
Santa Clara, CA 95050

Mailing Address:
1500 Warburton Avenue
Santa Clara, CA 95010

Application #: 12436

January 2006

Application Engineer: Ted Hull

Title V – Administrative Amendment

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a designated facility as defined by BAAQMD Regulation 2-6-204. The Emission Guidelines for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc) require the owner or operator of a landfill that is subject to this part and that has a design capacity of greater than or equal to 2.5 million mega grams and 2.5 million cubic meters to obtain an operating permit pursuant to Part 70. As discussed in more detail below in Section C.IV. of this report, this facility is subject to these emission guidelines and meets the designated facility criteria listed in 40 CFR § 60.32c(c).

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility number that consists of a letter and a 4-digit number. This facility number is also considered to be the identifier for the permit.

City of Santa Clara was issued an initial Title V permit on September 24, 2003. This application is for an administrative permit amendment.

B. Requested Changes to the Permit

City of Santa Clara has requested a change to the permitted number of vertical landfill gas wells listed in the Title V permit. The permit currently lists the number of gas collection wells as 80, when in fact the correct number is 81. This discrepancy is the result of clerical errors on well start-up/shutdown notifications to the BAAQMD. One less gas collection well was taken out of service than had been anticipated (and reported). The number of new well installations was reported correctly.

There is no increase of permitted emissions associated with the proposed change to the permit. The change is “Administrative” because it is merely the correction of a clerical error and not the installation of a new well.

C. Summary of Proposed Changes to the Permit

In addition to the change to the well count requested by City of Santa Clara, the District will make additional administrative amendments to update requirements and standardize the permit. The following is a summary of the proposed revisions to the permit:

Section II: Equipment

- The number of permitted gas collection wells listed in Table II-A will be changed from 80 to 81.

Section III: Generally Applicable Requirements

- Language will be added to Section III to clarify that this section contains requirements that may apply to temporary sources. This provision allows contractors that have "portable" equipment permits that require them to comply with all applicable requirements to work at the facility on a temporary basis, even if the permit does not specifically list the temporary source. Examples are temporary sand-blasting or soil-vapor extraction equipment.
- The website address for SIP requirements will be updated.

Section IV: Source-Specific Applicable Requirements

- The website address for SIP requirements will be updated.
- SIP Regulation 1-523.5 "Maintenance and Calibration" will be deleted. BAAQMD Regulation 1-523.5 is now SIP approved and federally enforceable.
- The future effective dates for 40 CFR Part 63 have passed and will therefore be removed from the permit.

Section VI: Permit Conditions

- Permit Condition #2935, part 2 will be modified to correct the number of permitted wells as previously discussed.

Section VII: Applicable Limits and Compliance Monitoring Requirements

- A note will be added to the standard text to state that Sections I-VI take precedence if there is a conflict with the VII Tables.

Section IX: Revision History

- This section will be updated to account for the Administrative Revisions discussed herein.

D. Recommendation

Issue an Administrative Amendment to the Title V permit for City of Santa Clara as shown in the Proposed Major Facility Review Permit and described in this evaluation.

By: _____

Ted Hull
Senior Air Quality Engineer

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