

July 27, 2005

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

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is issuing a significant revision to the Major Facility Review Permit for Redwood Landfill, Inc. (Facility # A1179) pursuant to Applications # 10873 and # 10874.

**ALAMEDA COUNTY**  
Roberta Cooper  
Scott Haggerty  
Nate Miley  
Shelia Young

The District proposed a significant permit revision for this facility on April 12, 2005. The purpose of this revision is to increase the maximum permitted landfill gas sulfur content for landfill gas from the S-5 Redwood Landfill and to increase the maximum permitted sulfur dioxide emission rate from the A-50 Landfill Gas Flare.

**CONTRA COSTA COUNTY**  
Mark DeSaulnier  
Mark Ross  
(Secretary)  
Michael Shimansky  
Gayle B. Uilkema  
(Vice-Chairperson)

No comments on this proposed significant revision were received from the public or the facility. During the EPA comment period, EPA made a verbal comment that the emission calculations for this project were not correct. The District reviewed the emission calculations and did find errors in these calculations. The correct proposed emissions for the S-5 Redwood Landfill and A-50 Landfill Gas Flare are 52.4 tons/year of SO<sub>2</sub>, 7.15 tons/year of H<sub>2</sub>S, and 0.02 tons/year of CS<sub>2</sub>, and the correct emission increases are 32.4 tons/year of SO<sub>2</sub>, 5.79 tons/year of H<sub>2</sub>S, and 0.02 tons/year of CS<sub>2</sub>. However, these corrections to the emission calculations do not change the proposed permit conditions nor any of the conclusions discussed in the Evaluation Report. Based on a case-by-case RACT determination, the flare will comply with RACT for SO<sub>2</sub> emissions. MACT does not apply. Emission reduction credits will not be required because facility wide SO<sub>2</sub> emissions will be less than 100 tons/year.

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

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
Chris Daly  
Jake McGoldrick  
Gavin Newsom

The following additional administrative amendments were made to the permit pursuant to Application # 11948: the responsible official was changed from James Devlin to Ramin Khany, several citation references were corrected in Table III, and the web site address for SIP provisions was updated in Section XII.

**SAN MATEO COUNTY**  
Jerry Hill  
Marland Townsend  
(Chairperson)

Enclosed is a copy of the final revised permit. If you have any questions regarding this project, please call Steve A Hill, Air Quality Engineering Manager, at (415) 749-4673.

Sincerely yours,

**SANTA CLARA COUNTY**  
Erin Garner  
Liz Kniss  
Patrick Kwok  
Julia Miller

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Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

**SOLANO COUNTY**  
John F. Silva

Enclosure

**SONOMA COUNTY**  
Tim Smith  
Pamela Torliatt

SAH:csa

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

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