

June 29, 2006

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 proposing a Significant Revision of the Major Facility Review (MFR) Permit for Facility # A4618. The District is also proposing a Significant Revision of this permit.

Application Numbers	Facility Number	Facility Name	Address, City	Type of Operation
13196	A4618	Allied Waste Industries, Inc.	901 Bailey Road, Pittsburg, CA 94565	Active Solid Waste Landfill

The main purpose of the proposed significant revision (Application # 13196) is to establish an alternative wellhead oxygen standard for landfill gas collection wells associated with the S-1 Keller Canyon Landfill. District Regulation 8, Rule 34 and the NSPS for MSW Landfills allow the District to establish site-specific wellhead limits in lieu of the default wellhead limits stated in the regulations, provided the site-specific alternative wellhead limits do not result in subsurface fires or inhibit anaerobic decomposition of the refuse. The District has determined that a proposed alternative oxygen standard of 15% O<sub>2</sub> by volume is appropriate for five gas collection wells, as long as this alternative limit does not result in surface emission leaks near the vicinity of these wells. The District is proposing to identify the alternative wellhead oxygen limit, the applicability criteria, the monitoring and record keeping requirements, and other procedures related to the alternative oxygen standard in Condition # 17309, Part 20c and in Tables IV-A, VII-A, and VIII. The District is also proposing to make an administrative correction to a date citation in Section X Revision History of the MFR Permit. This application will not result in any emission increases.

The statement of basis for Application # 13196 contains a detailed explanation of all proposed permit revisions. All proposed permit revisions are clearly shown in strikeout and underline formatting in the proposed permit and are summarized in Section X of the proposed permit.

**ALAMEDA COUNTY**

Roberta Cooper  
Scott Haggerty  
Janet Lockhart  
Nate Miley

**CONTRA COSTA COUNTY**

Mark DeSaulnier  
Mark Ross  
(Vice-Chair)  
Michael Shimansky  
Gayle B. Uilkema  
(Chair)

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO COUNTY**

Chris Daly  
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Erin Garner  
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Liz Kniss  
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**SOLANO COUNTY**

John F. Silva

**SONOMA COUNTY**

Tim Smith  
Pamela Torliatt

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

The District has made a preliminary decision to issue the Significant Revision to the Major Facility Review Permit, but the final decision on the permit issuance will consider public and EPA comments on this preliminary decision. The notice inviting written public comments will be published in the Contra Costa Times. The final date for comments is August 15, 2006.

Enclosed for your information is a copy of the proposed permit, the statement of basis for Application # 13196, and the engineering evaluations for Application # 13178. If you have any questions regarding this project, please call Dennis Jang, Senior Air Quality Engineer, at: (415) 749-4707, fax (415) 749-5030.

Very truly yours,

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Jack P. Broadbent  
Executive Officer/Air Pollution Control

Officer

Enclosures: Proposed MFR Permit for Site # A4618  
Statement of Basis for Application # 13196  
Engineering Evaluation for Application # 13178

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