

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

**Permit Evaluation and
Statement of Basis**

**MAJOR FACILITY REVIEW PERMIT
MINOR REVISION**

for
**City of Santa Clara Landfill
Facility #A3464**

Facility Address:
5401 Lafayette Street
Santa Clara, CA

Mailing Address:
1500 Warburton Avenue
Santa Clara, CA

Application #: 14620

July 2006

Application Engineer: Robert Hull

Title V – Minor Revision

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. 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.

The City of Santa Clara Landfill was issued an initial Title V permit on March 6, 2003 and an Administrative Amendment on February 6, 2006. This application is for a Minor Permit Revision.

B. Requested Changes to the Permit

Minor Permit Revision

In order to adequately manage the landfill gas generated at the site, the facility has applied for modifications to their permit to operate as follows:

- **Replacement of up to (5) Vertical Gas Extraction Wells; and Decommissioning of up to (5) Vertical Gas Extraction Wells**

City of Santa Clara was issued an Authority to Construct for these modifications on May 4, 2006 under Application #14392.

C. Emissions Discussion

The proposed modifications are intended to improve the efficiency of the landfill gas collection system, so it is therefore assumed that more gas will be collected. The applicant estimates that the modifications will result in a net increase of 45 scfm of collected landfill gas. The increased total flow will be well within the current capacity of the gas collection/control system.

The emissions from the Landfill Gas Flare A-2 have already been fully accounted for, so there is no increase of emissions for this application.

D. Monitoring Analysis

The existing monitoring for the facility is adequate to demonstrate compliance with all applicable emissions limits. The proposed modifications to the Title V permit will not change the current monitoring requirements, except where equipment has been removed.

E. Modified Permit Conditions

The Permit Condition # 2935, Part 2 lists the required well components of the landfill gas collection system for this site. In order to provide flexibility in the installation and removal of collection system components in accordance with Authority to Construct #14392, it is recommended that the existing condition be modified as follows:

2. The landfill gas collection system, ~~consisting of 81 vertical wells~~, shall be operated continuously. Wells shall not be shut off, disconnected, or removed from operation without written authorization from the APCO, unless the Permit Holder complies with all applicable requirements of Regulation 8, Rule 34, Sections 113, 117, and 118. [The Permit Holder shall apply for and receive an Authority to Construct before modifying the landfill gas collection system.](#) Increasing or decreasing the number of wells or collectors, or significantly changing the length of collectors, or the locations of wells or collectors are all considered to be modifications that are subject to the Authority to Construct requirement. [The routine addition or modification of risers, laterals, or header pipes does not require an Authority to Construct.](#)

[The landfill is currently authorized for 81 vertical gas extraction wells. However, this total is subject to change pursuant to additions or removals made in accordance with an approved Authority to Construct. The Permit Holder has been issued an Authority to Construct for the following well modifications under Permit Application #14392:](#)

[Replacement of up to \(5\) vertical extraction wells](#)
[Decommissioning of up to \(5\) vertical extraction wells](#)

[Upon completion of the approved modifications, the total number of vertical extraction wells will be 76.](#) (basis: Regulation 2-1-301, 8-34-301.1, 8-34-305)

F. Summary of Proposed Changes to the Permit

Changes to the Title V permit are shown in strikeout/underline format in the proposed version of the permit. In summary, the following changes will be made to the permit:

Section VI: Permit Conditions

- Condition #2935, Part 2 will be changed as shown above to facilitate the additions and removal of equipment as specified in Authority to Construct #14329.

Section IX: Revision History

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

G. Recommendation

Issue a Minor Permit Revision to the Title V permit for City of Santa Clara Landfill as shown in the Proposed Major Facility Review Permit and described in this evaluation.

By: _____

Ted Hull

Senior Air Quality Engineer