

December 15, 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 proposing to reopen 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
10393 and 11385	A4618	Allied Waste Industries, Inc.	901 Bailey Road, Pittsburg, CA 94565	Active Solid Waste Landfill

The main purpose of the reopening (Application # 10393) is to incorporate the NESHAP requirements for MSW Landfills, which were promulgated by EPA on January 16, 2003, into the MFR permit. In addition, the District is proposing to make this permit more consistent with other landfill MFR permits: by combining the separate tables for the landfill and flare into a single table for the landfill and flare; by updating and correcting applicable requirements; by clarifying source testing, record keeping, notifying, and reporting procedures in permit conditions; and by deleting obsolete, duplicative, or superfluous requirements and limits. The District is also proposing to update the revision history, to add several terms to the glossary, and to correct the web site address for SIP requirements. This application will not result in any emission increases.

The main purposes of the significant revision (Application # 11385) are to add a new flare (A-2) to the MFR permit and to revise several concentration and emission limits that were evaluated by the District pursuant to NSR Application # 11386. The District is also proposing permit condition modifications that will allow this facility to expand the landfill gas collection system (NSR Application # 12155). This application will result in the following emission increases:

Pollutant	Tons/Year	HAP	Tons/Year
CO	66.576	acrylonitrile	0.017
SO ₂	33.263	benzene	0.443
POC	3.582	formaldehyde	0.236
NO _x	19.973	hydrogen chloride	5.481
PM ₁₀	11.164	hydrogen fluoride	0.339

The statement of basis for Applications # 10393 and # 11385 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.

The District has made a preliminary decision to issue the Reopening and Significant Revision to the Major Facility Review, 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 January 20, 2006.

Enclosed for your information is a copy of the proposed permit, the statement of basis for Applications # 10393 and # 11385, and the engineering evaluations for Applications # 11386 and # 12155. If you have any questions regarding this project, please call Steve A. Hill, Permit Evaluation Manager, at (415) 749-4673, fax (415) 749-5030.

Very truly yours,

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

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Enclosures: Proposed MFR Permit for Site # A4618
Statement of Basis for Applications # 10393 and # 11385
Engineering Evaluation for Application # 11385
Engineering Evaluation for Application # 12155

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