

October 6, 2003

Mr. Jack Broadbent
Director of Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

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Scott Haggerty
(Chairperson)
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Dena Mossar

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SONOMA COUNTY

Tim Smith
Pamela Torliatt

William C. Norton
EXECUTIVE OFFICER/APCO

Re: **Allied Waste Industries (Keller Canyon Landfill Company) – Facility #A4618**
Minor Revision

Dear Mr. Broadbent:

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review Permit for Allied Waste Industries (Keller Canyon Landfill Company), Facility Number A4618, and is submitting the permit to EPA for review.

The purpose of this permit revision is to modify the landfill gas collection system to include additional well stations and collection wells. These changes are for the purpose of improving the gas collection. In addition, changes have been made to the permit to incorporate the latest regulatory requirements and the minor revisions made under application number 2379. In accordance with BAAQMD Regulations 2-6-201, 2-6-215 and 2-6-226, this permit revision is not a major modification pursuant to NSR or PSD, and therefore this action constitutes a minor permit revision. The Landfill, S1, is expected to comply with all applicable requirements.

The following changes have been made to the permit:

- Add and revise text in Section I, III, IV and VII to conform to current standard text.
- Correct and update regulatory dates in Sections I and III. Include additional applicable requirement citations in Section III.
- Update Table II A to reflect expansion of the landfill gas collection system.
- Update Table II B to conform to data presented for other landfill flares.
- Update minimum combustion zone temperature, in Tables II-B and VII-D, and Condition #17309 Part 23, to reflected the calculated minimum based on the most recent complying performance test (October 30, 2002)
- Update Tables IV-A, IV-B, IV-D, VII-A, VII-B, VII-D, and VIII to reflect EPA's adoption of BAAQMD Regulation 8, Rules 34, and 40 into the SIP and BAAQMD's subsequent adoption of amendments to Regulation 1-523 and Regulation 8, Rule 16.
- Update Tables IV-A to include applicable NSPS subsections of 60.754, 60.756, 60.757 and 60.759
- Update Tables IV-D to include applicable NSPS subsections of 60.752
- Revise Condition # 16462 to reflect minor wording changes made to Part 1 under application #2379.

- Revise Condition # 17309, Part 11 to update the number of transfer truck and scraper trips as modified in under application #2379
- Delete references in Condition # 17309, Parts 17 and 33 to proposed IC engines that will not be installed,
- Revise Condition # 17309, Part 20 to reflect expansion of the landfill gas collection system.
- Correct test methods referenced in Table VIII by adding optional methods and deleting obsolete methods.
- Add new terms to Section XI.
- SIP rules available on EPA's website

All changes are clearly shown in strikeout/underline format.

The District will issue the permit after the EPA 45-day review period is over and after addressing any EPA comments.

A copy of the proposed revisions to the Major Facility Review Permit and the engineering evaluations for application numbers 2379 and 7939 are enclosed for your information. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673**.

Very truly yours,

William C. Norton
Executive Officer/Air Pollution Control Officer

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Enclosures

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