

December 22, 2003

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

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

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Willie Brown, Jr.
Chris Daly
Jake McGoldrick

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY
Liz Kniss
Patrick Kwok
Julia Miller
Dena Mossar

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Dear Ms. Jordan:

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

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

In addition, the District is amending this permit to reflect a new "Responsible Official" for this facility. This change was requested by the facility after the proposed revision was submitted to EPA.

The permit was submitted for EPA review on October 6, 2003. EPA submitted no comments on this minor revision.

A copy of the final Major Facility Review Permit is 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,

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

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Enclosures

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