

November 12, 2003

Waste Management of Alameda County

10840 Altamont Pass Road
Livermore, CA 94550

Attention: Mr. Ken Lewis, General Manager

Application Number: 8324
Plant Number: A2066
Equipment Location:
Same as above

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Dear Mr. Lewis:

The District has completed the evaluation of your request for changes of conditions at the S-23 and S-24 Internal Combustion Engines (Application # 8324) and has made a preliminary decision to approve changes to Condition # 19237.

CONTRA COSTA COUNTY

Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

The District is also proposing a Significant Revision of the Major Facility Review (MFR) Permit for Facility # A2066. The proposed permit conditions for the engines include a reduction in the monitoring frequency for the key emission control system operating parameter. Therefore, this proposed MFR permit change constitutes a significant revision, as defined in Regulation 2-6-226.3.

MARIN COUNTY

Harold C. Brown, Jr.

NAPA COUNTY

Brad Wagenknecht

The proposed revision will not result in any cumulative emission increases.

SAN FRANCISCO COUNTY

Willie Brown, Jr.
Chris Daly
Jake McGoldrick

The main purpose of this revision is to change the key emission control system operating parameter and monitoring procedures for the Internal Combustion Engines (S-23 and S-24). Currently, the key parameter is average engine cylinder temperature and this temperature is monitored continuously. However, testing indicates that average engine cylinder temperature is not a good indicator of the NMOC destruction efficiency achieved by the engine. Therefore, the District is proposing to allow Waste Management to use a different key parameter: carbon monoxide concentration in the engine exhaust (corrected to 15% oxygen on a dry basis). The District is proposing to require daily monitoring of carbon monoxide and oxygen in the engine exhaust using a portable flue gas analyzer. The District is proposing to allow the monitoring frequency to be reduced to a weekly or monthly basis, if the corrected carbon monoxide concentration has low variability. The District is also proposing to revise the methane monitoring procedure that is used to calculate the heat input for these engines and to make other minor corrections. Specifically, the following changes have been made to the permit:

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

William C. Norton
EXECUTIVE
OFFICER/APCO

- Modify Permit Condition # 19237, Parts 4, 9, 10, and 11.
- Revise Tables IV-D, VII-D, and VIII to reflect revisions to Condition # 19237.
- Make minor corrections to requirements in Tables III, IV-A, IV-B, IV-D, and IV-E.

- Add Section X Revision History and correct numbering in subsequent sections.

All permit revisions are clearly shown in strikeout and underline formatting in the proposed permit.

The District has made a preliminary decision to issue the 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 Tri-Valley Herald. The final date for comments is January 5, 2004.

Enclosed for your information is a copy of the proposed permit revisions and the permit evaluation report. If you have any questions regarding this project, please call Carol Allen, Senior Air Quality Engineer, at (415) 749-4702, fax (415) 749-4949.

Very truly yours,

William C. Norton
Executive Officer/
Air Pollution Control Officer

SAH:CSA:myl

Enclosures

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