

March 12, 2004

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

Re: **Guadalupe Rubbish Disposal Company Facility # A3294**
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 Guadalupe Rubbish Disposal Company. (Facility Number A3294).

The District proposed a minor permit revision for this facility on September 30, 2003. The following changes were included in the proposed permit:

- The Responsible Official and Plant Contact was changed from James Lord to Paul Michael.
- The Maximum Daily Waste Acceptance Rate for the Landfill was corrected to coincide with the Solid Waste Permit.
- Source S-18, Materials Recovery Operation was added.
- Sources S-19 and S-20, Dirt Screening Operations were added.
- The Enclosed Landfill Gas Flare, A-9 was added.
- The Water Spray System, A-19 was added.
- Expired SIP requirements for Regulation 8, Rule 34 were removed.
- The number of active landfill gas collection wells was updated.
- The future effective dates for applicable requirements where those dates have already passed were removed.
- The requirements of the NESHAP for Municipal Solid Waste Landfills were added.
- The standard text in the permit was revised and updated.

Based on comments the District has received from the facility subsequent to the proposed minor permit revision, the District has made the following additional minor permit revisions:

- Part 22 was added to Permit Condition #6188 to synchronize reporting periods and allow overlapping reports to be combined.
- References to Sources S-3 and S-17 and Abatement Device A-3 were removed from all sections of the permit. This equipment is no longer located at the facility.
- An exception to the daily waste acceptance limit was added for temporary situations that are approved by the Local Enforcement Agency.
- Sources S-21 and S-22, Diesel IC Engines for the Trommel Screen were subject to a loss of exemption from District permitting so they were added to the Title V permit. The permitting of these engines does not impact the emissions at the facility. The total annual potential to emit of these engines if they run 8760 hours/year is approximately 2.9 tons NO_x, 1.2 tons CO, 0.3 tons VOC and lesser amounts of SO₂ and PM₁₀. Because they are not new sources, and because the emissions are small, this is not a substantive change to the permit.

- Regulation 8-34-301.4 was removed as an applicable requirement for the facility because the requirement also exists in the Title V permit for Gas Recovery Systems, Facility #B1669, the end user of the gas generated at the landfill.
- The number of active landfill gas collection wells was corrected. The number included in the proposed permit was not accurate.
- The timeline for delivering source test results to the District was extended to 60 days after the test date.
- The reference to a bypass valve for the 40 CFR 60.753(a) and (e) “Gas Flow” requirement in Table VII-C (formerly VII-D) was removed from the “Monitoring Type” column.

Copies of the revised Major Facility Review Permit, comments from the facility, and the District’s response to those comments are enclosed for your information. If you have any questions on this matter, please call **Ted Hull, Air Quality Engineer II, at (415) 749-4919.**

Very truly yours,

Jack P. Broadbent
Executive Officer/
Air Pollution Control Officer

RTH:myl

Enclosures

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