

**Amended Engineering Evaluation  
Allied Waste Industries (Keller Canyon Landfill Company), Plant #4618  
Minor Condition Changes, Application #2379  
September 30, 2003**

I. **Background:** Keller Canyon Landfill Company has applied for a change in permit conditions for the following sources:

- S1 Keller Canyon Landfill, Class II, active
- S3 Yard and Green Waste Stockpiles

The applicant has requested that:

1. condition #17309, part 11 be modified to reduce scraper trips from 50 to 45 per day and to increase total transfer truck trips from 140 to 175 per day at the landfill
2. condition #16462, part 1 be modified to increase the allowable amount of yard and green waste received at the stockpiles from 225 tons during any day to 1000 tons during any day. The total amount received during any consecutive 12-month period would remain unchanged at 70,200 tons per year.

The proposed modifications in this application do not require a significant permit revision, as defined in Regulation 2-6-226, to the Major Facility Review (Title V) Permit. Neither do the changes qualify for as administrative permit amendment, as defined in Regulation 2-6-201. As defined in Regulation 2-6-216, the proposed modification qualifies as a minor permit revision to the Major Facility Review (Title V) Permit.

II. **Emission Calculations:**

A. S1 Landfill Scraper and Transfer Truck trips: The applicant is proposing to decrease the number of scraper trips from 50 to 45 per day and to increase the number of transfer truck trips from 140 to 175 per day. Emission estimates and the basis for those estimates are shown in the attached spreadsheets submitted by the applicant.

Pollutant	Annual Emissions			Net Increase	
	Existing (tons/year)	Proposed (tons/year)	Proposed (pounds/operating day)	tons/year	pounds/operating day
TSP	21.51	23.71	151	2.2	14
PM <sub>10</sub>	7.94	8.41	53.7	0.47	3

B. S3 Yard and Green Waste Stockpiles: The maximum amount of waste that may be received on any day is increased from 225 to 1000 tons per day. The emission factor for particulate emissions generated by drop loading material onto a stockpile and removing material from the stockpile can be estimated by equation 1 in AP-42 Chapter 13.2.4, Aggregate Handling and Storage Piles, January 1995. This emission factor was derived in application number 21312.

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**II. Emission Calculations:**

B. S3 Yard and Green Waste Stockpiles (continued):

$$\text{Maximum Emissions per Day} = (\text{Maximum Waste Received, tons/day}) * (2 \text{ transfers}) * (\text{Emission Factor, lbs/ton})$$

Proposed Maximum Waste Received, tons/day	PM <sub>10</sub> Emission Factor, lbs/ton	Maximum Daily Emissions, lbs/day
1000	1.77 E-3	3.5

There is no change in the annual emissions from this source since the annual amount of yard and green waste received is unchanged.

**III. Plant Cumulative Increase:** The change in condition for S3, Yard and Green Waste Stockpiles, does not result in any increase in annual emissions and does not result in an increase in the Plant Cumulative Emissions. The condition change for S1, Landfill scraper and transfer truck trips, results in an increase in Plant Cumulative Emission of 0.47 ton/yr PM<sub>10</sub>.

**IV. Toxic Air Contaminants (TAC):** There is no increase in emissions of toxic air pollutants; therefore, a risk screen analysis is not required (BAAQMD Toxic Risk Management Policy).

**V. Monitoring Requirements:** The current monitoring requirements also apply to the proposed modifications. No additional requirements or changes to the current monitoring requirements are needed.

**VI. Statement of Compliance:**

Regulations: The proposed changes in scraper and transfer truck trips at S1 and maximum waste received at S3 are expected to comply with Regulation 6-301 (Ringelmann #1 Limitation) and Regulation 6-311 (General Operations).

BACT: With emissions of PM<sub>10</sub> that are greater than 10 pounds per highest day, BACT is trigger for the proposed number of landfill scraper and transfer truck trips (at S1). BACT was also triggered for the existing number of scraper and transfer truck trips. With the application of dust suppressants, this operation will meet BACT requirements. The current conditions, including the requirement for applying dust suppressants, will continue to apply for the proposed changes.

Offsets, PSD, and NESHAPS do not apply to this application.

The project is over 1000 feet from the nearest school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

The Engineering Evaluation for this application uses fixed standards and objective measurements and does not involve any element of discretion. In accordance with District Permit Handbook Chapter 11.8 "Miscellaneous Inorganic Operations," this application is considered ministerial. No further CEQA review is required.

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**VII. Permit Conditions:** The permit condition for S1, condition #17309, part 11 will be modified to reflect the decrease in scraper trips from 50 to 45 and the increase in transfer truck trips from 140 to 175. The permit condition for S3, condition #16462, part 1 will be modified to reflect the increase in the maximum daily yard and green waste received from 225 tons to 1000 tons.

Condition #17309

For S1, Keller Canyon Landfill:

11. On-site traffic volume of the following heavy-duty vehicles shall not exceed the following number of round trips in any single day, calculated on an annual basis, except as otherwise provided in this permit:
  - a. ~~140~~ 175 transfer truck trips
  - b. 4 leachate transfer truck trips
  - c. ~~50~~ 45 scraper trips
  - d. For all heavy-duty vehicles, such other on-site travel as may be approved in writing by the APCO.

'Annual Basis' shall be calculated by dividing the number of total truck trips by the number of operating days in any 365-day period.

[Basis: Cumulative Increase]

Condition #16462

For S3, Yard and Green Waste Stockpiles:

1. The total amount of yard and green waste received at S3 shall not exceed ~~225 tons in a single day (calculated on an annual basis)~~ 1,000 tons during any day nor 70,200 tons during any consecutive 12-month period.  
[Basis: Cumulative Increase]

**VIII. Recommendation:** Issue a Permit to Operate with modified with conditions for the following sources:

- S1 Keller Canyon Landfill, Class II, active
- S3 Yard and Green Waste Stockpiles

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September 30, 2003