

January 12, 2005

Mr. Joe Morse  
**Kirby Canyon Recycling and Disposal Facility**  
P.O. Box 1870  
Morgan Hill, CA 95038

Attention: Mr. Joe Morse

**ALAMEDA COUNTY**

Roberta Cooper  
Scott Haggerty  
(Chairperson)  
Nate Miley  
Shelia Young

Subject: Minor Revision to Major Facility Review Permit for Kirby Canyon Landfill

Dear Mr. Morse:

**CONTRA COSTA COUNTY**

Mark DeSaulnier  
Erling Horn  
Mark Ross  
Gayle Uilkema  
(Secretary)

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 the Kirby Canyon Landfill, Site Number A1812. The purpose of this revision is to update the Title V permit to reflect recent District permitting activity and proposed permitting activity.

The following changes were made to the permit:

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO COUNTY**

Chris Daly  
Jake McGoldrick  
Gavin Newsom

**SAN MATEO COUNTY**

Jerry Hill  
Marland Townsend  
(Vice-Chairperson)

**SANTA CLARA COUNTY**

Erin Garner  
Liz Kniss  
Patrick Kwok  
Julia Miller

**SOLANO COUNTY**

John F. Silva

**SONOMA COUNTY**

Tim Smith  
Pamela Torliatt

- The gas collection well totals in the Landfill source description were updated to reflect recent construction activities. (Application #7835)
- The existing (loss of permit exemption) Diesel IC Engines S-3 and S-4 were added. (Application #7300)
- The proposed Landfill Gas Fired IC Engine Generator Sets S-5, S-6, and S-7 were added. (Application #9220)
- The proposed Landfill Gas Fired IC Engine Generator Set S-2 was removed. (Application #3539 withdrawn by applicant)
- The new Landfill Gas Flare A-11 was added and the existing Flare A-10 was removed. (Application #8255)
- The Generally Applicable Requirements (Table III) were updated.
- Tables and permit conditions were updated to reflect the additions and removals of permitted and proposed equipment.
- Future effective dates that have since passed were removed.
- Section X "Revision History" was added and the "Glossary" and "Applicable State Implementation Plan" were renumbered as Sections XI and XII.

The EPA did not comment on the proposed revision. Based on the comments submitted by Richard Merrill of EMCON/OWT, Inc. on behalf of the Kirby Canyon Landfill, dated December 16, 2004, the District has made the following additional minor permit revisions:

- The timeline for delivering source test results to the District was extended to 60 days after the test date.
- The Carbon Monoxide (CO) emissions limit for the Flare A-11 was corrected from 0.2 lb/MMBTU to 0.3 lb/MMBTU, as was previously agreed upon by Kirby Canyon and the District.

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Following is the District's response to your request for changes to the permit:

**Response to Comments:**

A summary of each of the comments is listed below, followed by a discussion of the comment, the District's position, and any changes that have been made to the permit as a result of the comment.

**Comment #1: The Carbon Monoxide (CO) emissions limit for the A-11 Flare is not correctly reflected in the proposed Title V minor revision.**

- Discussion:

During the permitting of the new Landfill Gas Flare A-11 (Application #008255), EMCON/OWT requested that the District change the CO emissions limit from 0.2 lb/MMBTU to 0.3 lb/MMBTU to allow for more efficient operation of the flare. As this is not an unusual request, has been granted for other landfill gas flares, and meets the intent of Reasonably Available Control Technology (RACT) for secondary air pollutants, the District agreed to the change and notified EMCON/OWT in writing on November 24, 2003, prior to the startup of the flare. EMCON/OWT is requesting that the Title V permit reflect this change.

- District's Position:

The District is not opposed to this request. The 0.2 lb/MMBTU CO limit that was included in the proposed minor permit revision was in error.

- Changes to the Permit as a Result of Comment #1:

The Carbon Monoxide (CO) emissions limit for the Flare A-11 was corrected from 0.2 lb/MMBTU to 0.3 lb/MMBTU in Permit Condition #1437, Part 11 and in Table VII-A.

**Comment #2: The Kirby Canyon Landfill requests that the timeline for delivering source test results to the District after the test date be extended from 45 to 60 days.**

- Discussion:

Permit Condition #1437, Part 12, currently requires that source test results for the Flare A-11 be submitted to the District within 45 days of the test date. On behalf of the Kirby Canyon Landfill, EMCON/OWT has requested to have the report due date extended to 60 days after the test date to allow ample time for laboratory samples to be analyzed and reports prepared.

- District's Position:

The District is not opposed to this request.

- Changes to the Permit as a Result of Comment #2:

The time for submitting source test reports has been extended to 60 days from the date of the test in Permit Condition #1437, Part 12.

A copy of the revised 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.**

Sincerely,

Signed by Jack P. Broadbent

Jack Broadbent

Executive Officer/Air Pollution Control Officer

JB:SAH:rth

**Enclosure:**

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