



"Carol Allen"  
<CAllen@baaqmd.gov>  
01/15/2009 04:20 PM

To "Deidra Dingman" <dding@cd.cccounty.us>  
cc  
bcc  
Subject Keller Canyon Proposal to Increase the Daily Waste  
Acceptance Rate

History:  This message has been forwarded.

January 15, 2009

**Contra Costa County**

Department of Conservation & Development  
County Administration Building  
651 Pine Street  
Martinez, CA 94553-1229

Attention: Ms. Deidra Dingman  
Conservation Programs Manager

Dear Ms Dingman:

The Bay Area Air Quality Management District (BAAQMD), acting as a responsible agency for the Keller Canyon Landfill Facility located near Pittsburg, CA, submits the following comments concerning the December 15, 2008 Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report (Draft SEIR) for the following project:

Application (LP082026) to Amend Land Use Permit 2020-89  
Conditions of Approval for the Keller Canyon Landfill By:

- Increasing the Maximum Daily Tonnage Limit from 3500 TPD to 4900 TDP for Refuse (Excluding Non-Landfilled Materials) and
- Establishing Maximum Daily Limits for Non-Landfilled Materials:
  - 500 TPD of Green Waste,
  - 300 TPD of Wood Waste, and
  - 500 TPD of Inert Materials

The proposed project will require revisions of the BAAQMD Permit to Operate for Keller Canyon Landfill Company (BAAQMD Site # A4618). In particular, BAAQMD Condition # 17309, Part 2b currently limits waste acceptance at the S-1 Keller Canyon Landfill to 3,500 tons per day. Other BAAQMD limits and permit conditions may need to be revised or clarified for consistency with the proposed land use permit changes. This project will also require a revision of the Title V Operating Permit for Site # A4618. The applicant must apply for and receive a Change of Permit Conditions from the BAAQMD

before implementing any of the proposed project revisions.

Since the proposed land use permit changes will likely result in criteria pollutant emission increases, toxic air contaminant (TAC) emission increases, and greenhouse gas emission increases, this project has the potential to result in adverse air quality, odor, and climate change impacts. The Draft SEIR should contain a complete discussion of these potential emission increases and all ensuing impacts. Emissions from the following sources of air emissions should be determined and evaluated in the Draft SEIR.

- Landfill Gas Emission Increases due to Waste Decomposition
- Secondary Landfill Gas Combustion Emission Increases
- Particulate Emission Increases Due to Fugitive Road Dust
- Particulate Emission Increases From the Larger Working Face
- Diesel PM Emission Increases From Material Delivery Vehicles
- Diesel PM Emission Increases From On-Site Stationary Engines
- Diesel PM Emission Increases From On-Site Mobile Equipment

Please direct any questions you may have about air quality emission calculations to Carol Allen, Senior Air Quality Engineer, at 415-749-4702 or [callen@BAAQMD.gov](mailto:callen@BAAQMD.gov).

Sincerely,

Carol Allen  
Senior Air Quality Engineer  
BAAQMD