

COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

March 8, 2004

TO: BRIAN BATEMAN, DIRECTOR, ENGINEERING DIVISION

FROM: KELLY WEE, DIRECTOR OF ENFORCEMENT *KW*

SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

PG&E COMPANY, HUNTER'S POINT POWER PLANT – Site #A0024

Background

This review was initiated as part of the District evaluation of an application by Pacific Gas & Electric Company (PG&E) for a Title V Permit. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of a renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on going compliance.

Finding

The Enforcement Division staff has commenced a review of the records for Pacific Gas & Electric Company for the period of February 28, 2003 to February 28, 2004. During this review period, Pacific Gas & Electric's activities known to the District include:

The District did not issue any Notices of Violation during this review period.

No complaints have been received alleging PG&E as the source.

During this review period PG&E requested breakdown relief associated with two indicated NOX excesses and three inoperative monitors. Both indicated excesses were found not to be in violation. All three inoperative monitors are back online and in compliance.

There are no pending variances, abatement orders, or office conferences regarding this facility.

In addition, staff reviewed Pacific Gas & Electric's Annual Compliance Certifications for 1999 – 2004 and found no outstanding compliance issues.

Conclusions

The Compliance and Enforcement Division finds that ongoing compliance can be reasonably assured for this facility, due to the above record.