

# COMPLIANCE AND ENFORCEMENT DIVISION

## OFFICE MEMORANDUM

April 27, 2004

TO: BRIAN BATEMAN, DIRECTOR, ENGINEERING DIVISION

FROM: KELLY WEE, DIRECTOR OF ENFORCEMENT

SUBJECT: REVISED REVIEW OF COMPLIANCE RECORD OF:

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

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#### Introduction

At the April 6, 2004 Informational Meeting on the Title V Permit Process for Pacific Gas & Electric Company (PG&E), staff was requested to provide additional compliance details pertaining to the Hunter's Point facility. Staff has revised this document to incorporate the additional details.

#### Background

This review was initiated as part of the District's evaluation of PG&E's Title V Permit renewal. It is the Compliance and Enforcement Division's standard practice to undertake a compliance record review prior to renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance that occurred during the previous twelve months has been adequately addressed. Additionally, the review is intended to recommend additional permit conditions and limitations necessary to protect public health and to assure on-going compliance.

#### Facility Summary

The primary function of this facility is to supply electrical power to the City and County of San Francisco. The primary electrical generation source is a natural gas-fired boiler that powers a steam turbine. Continuous emission monitors, calibrated daily, are used to monitor the emissions from this source. This facility also operates two low-usage gas turbines when mandated by the California Independent System Operator, usually when power reserves for San Francisco are low. The facility uses one jet fuel storage tank for storing jet fuel and all other storage tanks are empty. Some of these empty tanks are currently being dismantled. This facility also uses solvents and coatings for wipe cleaning, maintenance and painting.

As described above, equipment for which this facility is currently permitted includes: two 25 MW standby combustion turbines, one 170 MW electric utility steam boiler, eight lubricating oil storage tanks (all empty), eight fuel oil tanks (all empty), one jet fuel tank, one jet fuel loading/unloading facility, one oil-water separator, one cold solvent degreaser, wipe cleaning, a coating operation, and a residual fuel oil handling facility.

## Findings

- I. The District did not issue any Notices of Violation during the permit term.
- II. The community surrounding the facility has been publicly complaining about the emissions impact from the power plant, alleging negative health effects in their neighborhood. Many people attending the April 6, 2004 meeting indicated that they registered complaints with the District against PG&E Hunter's Point. However, a search of District records shows that no complaints to the District's 1-800-334-ODOR complaint phone line alleging PG&E Hunters Point or any other complaints that could be attributed to PG&E were received. PG&E received no complaints alleging specific air pollution issues. Field staff received one phone message concerning PG&E that was investigated.
- III. During this review period, PG&E requested breakdown relief associated with two NO<sub>x</sub> excesses and three inoperative monitors. Summaries of these events are as follows:
  - a. NO<sub>x</sub> Excesses (As Indicated)
    1. August 31, 2003. This excess was reported to the District in error. Upon review of the charts, there were no excess emissions.
    2. September 4, 2003: duration from 4:22 pm to 4:58 pm. (Total of 36 minutes of NO<sub>x</sub> excess) This excess occurred during the District-required boiler performance testing and is exempt per Regulation 9-11-111.
  - b. Inoperative Monitors (Total Monitor Downtime – 229 hours, 22 minutes, out of 8,760 total hours [2.7%]; total NO<sub>x</sub> monitor downtime 85 hours, 6 minutes [1%]; total opacity monitor downtime 144 hours, 16 minutes [1.6%])
    1. August 31, 2003 (NO<sub>x</sub>): duration from 7:02 am to September 2, 2003, at 1:58 pm. (Total of 54 hours, 56 minutes) Smart programmable logic controller failed. The boiler was shut down for the majority of the monitor downtime. Following a seven month shutdown to replace the turbine in the generator and normal boiler maintenance, the boiler was in start-up/shutdown mode, consistent with typical start-up after maintenance.
    2. September 4, 2003 (opacity): duration from 2:19 pm to September 10, 2003 at 3:35 pm. (Total of 144 hours, 16 minutes) Smart programmable logic controller failed and the chopper motor required replacement.
    3. December 8, 2003 (NO<sub>x</sub>) at 5:20 am to December 9, 2003 at 11:30 am. (Total of 30 hours, 10 minutes) NO<sub>x</sub> calibration problem.
- IV. From August 1997 through April 2004, the District's Source Test unit performed 23 Field Accuracy Tests on the units operating at this facility. A Field Accuracy Test (FAT) is actually two tests. First, it is a compliance source test for the established emissions limits and secondly, it is a test to verify compliance with the accuracy requirements of the in-stack Continuous Emission Monitors (CEMs). During the previous twelve months, tests

were performed on the boiler on September 11, 2003 and on April 16, 2004. The source complied with the NO<sub>x</sub>, CO and CO<sub>2</sub> limits and the CEMs were verified to be accurate.

V. There were compliance inspections performed at this facility on June 23, 1999, August 24, 2000, August 28, 2001, May 23, 2002, June 5, 2003, and April 20, 2004. Permitted sources were inspected and determined to be in compliance with all applicable air quality regulations. No violations were documented during any of those inspections.

VI. There are no pending Variances or Abatement orders.

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

### **Conclusions**

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