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BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT

January 30, 2013

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

Attn: Title V Reports

**Re: Semiannual Monitoring Report for Plant No. A0733**

The City of Sunnyvale Water Pollution Control Plant (No. A0733) is submitting this semiannual report to meet Standard Condition F and provide a report for Permit Condition 10844 #4 and #6 and Permit Condition 19978 #2 as required by our Major Facility Review Permit.

The monitoring required by this permit and the monitoring results are summarized below:

**Condition 10844 (4, 6):**

Annual source testing for S-14 and S-15 was conducted in the first quarter of 2012 and the results were reported in the Semiannual Monitoring Report for the period ending June 30, 2012. Those results were compliance with the emission limits and regulations specified in the permit.

**Condition 19978 (2):**

Information to show compliance with Permit Condition 19978 (2) for the third and fourth quarterly testing of total reduced sulfur compounds in digester gas used in Sources 16, 17, & 18 are provided in the table below:

Total Reduced Sulfur Compounds – Draeger Tube Test results				
Sources:	Date of Test	Requirement	Result ppmv (dry)	Compliant (Y/N)
S-16, 17 & 18				
First Quarter Sampling:				
Digester Gas	8/15/12	19978 (2)	950	Y
Second Quarter Sampling:				
Digester Gas	12/12/12	19978 (2)	950	Y

Additionally, during this reporting period, the following instances of non-compliance were also identified and reported:

- On August 6, 2012, Sunnyvale submitted deviation reports to address two compliance issues that were identified and described in the Annual Compliance Certification submitted on July 30, 2012: 1) Omission of filing for Authority to Construct permits for two anaerobic digesters in which the covers were modified from floating to fixed design; and 2) Intermittent exceedance of the heat input thresholds listed in the facility’s permit for the engines that comprise the onsite power generation facility.

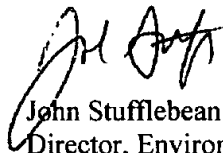
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TDD (408) 730-7501**

- On November 16, 2012, BAAQMD issued Notices of Violation (#A52007, A52008, and A52009) to the City of Sunnyvale for the compliance issues reported in the August deviation reports.
- On November 29, 2012, Sunnyvale responded to the Notices. This included a report of resolution on the Authority to Construction permit for 2 digesters; the required forms and fees had been submitted and BAAQMD issued the PTO on October 22, 2012. The response also included reference to interim resolution of the heat input compliance issue; Sunnyvale has subsequently maintained compliance with operational modifications and has an active request for a change to the permit condition pending additional information to BAAQMD from Sunnyvale.
- On November 30, 2012, Sunnyvale submitted an updated Statement of Compliance, clarifying that the previous compliance issues are being addressed to maintain current compliance.
- On December 19, 2012, Sunnyvale submitted, based on clarification from the BAAQMD inspector that such a report is required, an additional deviation report regarding the receipt of and response to the NOVs described above.

I am the responsible person for the City of Sunnyvale Water Pollution Control Plant, and I certify that this report is true, accurate, and complete.

Please contact Melody Tovar at (408) 730-7808 if you have any questions or comments on this report.

Sincerely,



John Stufflebean  
Director, Environmental Services Department

cc: Melody Tovar, Regulatory Programs Division Manager  
Carol Lee, Senior Air Quality Inspector, BAAQMD  
Director of the Air Division, US EPA, Region IX, Attn: Air-3