

**District Response to Comment from City of Sunnyvale Water Pollution Control
Plant Number: A0733
Application Number 24582**

Comment from City of Sunnyvale Water Pollution Control	Response from Bay Area Air Quality Management District
Draft Title V Permit	
Change title for Melody Tovar to Regulatory Programs Division	Change made as noted.
Previous comments to consider exemption from Regulation 8 were not incorporated. More specifically, Reg 8, Rule 34 applies to solid waste disposal sites and should not be applied in whole to S14 and S15. The City's compliance with this regulation is covered by BAAQMD facility Title V Permit A5905, as described in the Statement of Basis. Permit A5905 covers the solid waste disposal site and materials processing facility. Applicability of 8-34 in A0733 should be screened to remove any duplication.	S-14 and S-15 burn landfill gas. It is the District's determination that the handling (i.e., use of landfill gas as a fuel) must be in accordance with the control requirements of Regulation 8, Rule 34. As a result, the sections regarding the landfill gas were put into the applicable requirements section for S-14 and S-15. No change was made.
SO2 monitoring is not described in the condition referenced on page 20 (Condition # 10844). This may be an artifact of the original condition prior to the modification by the District in 2011.	S-14 and S-15 have no SO2 monitoring requirements due to the removal of the H2S quarterly monitoring of the digester gas which was requested by the facility (Application # 18331). Instead, they have requested an annual SO2 source testing requirement. The District permit engineer removed the H2S monitoring requirement from Part 6 of Condition No. 10844, but mistakenly forgot to include the replacement annual source testing requirement. To ensure that the engines (S-14 and S-15) are in compliance with Regulation 9-1-302 standards, annual source testing requirements will be added (see next page for condition change).
The NESHAP RICE regulation was amended effective April 1, 2013 and the City is working to understand the applicability to and impacts for the facility. The City may seek additional clarification or have additional comments upon further review.	Comment noted. No change was made.
The SO2 monitoring refers to Condition No. 10844, which is not related to this set of sources. Please refer to Condition 19978 and note that the reduced sulfur in collected gas is used as a surrogate for SO2 monitoring.	SO2 source testing requirements will be added to Condition NO. 10844 to correct the mistake in its exclusion from Application No. 18331 (see next page for condition change)
Statement of Basis	
Add information on Authority to Construct for digesters 3 & 4 (which was received by the BAAQMD only recently).	Change was made as noted. Since this application did not result in a modification of the digester, there was no effect to the Title V permit.
Update to reflect that the District is not awaiting response on meeting BACT but "addressing" BACT for application still undergoing review.	Change was made to use new wording. Since this is just an editorial correct to the Statement of Basis, there was no effect to the Title V permit.
See comments about regarding overlap and duplication for A5905. Also, revise the language regarding the heat input issue to reflect the facility is currently in compliance.	Changes made as applicable. There was no effect to the Title V permit.
Update the information regarding compliance issues to reflect current status, including permit issued for Digesters 3&4.	Changes made. There was no effect to the Title V permit.

Change to Part 6 of Condition # 10844:

6. In order to demonstrate compliance with Part 4 above and Regulations 8-34-301.4, [9-1-302](#), 9-8-302.1, and 9-8-302.3, the owner/operator shall conduct and successfully pass a District-approved source test annually on S-14 and S-15. Source tests shall be conducted no sooner than 9 months and no later than 12 months after the previous source test. The Source Test Section of the District shall be contacted to obtain their approval of the source test procedures at least 14 days in advance of each source test. They shall be notified of the scheduled test date at least 7 days in advance of each source test. The source test report shall be submitted to the Compliance and Enforcement Division of the District within 45 days of the test date. The report shall include the following information:

- a. landfill gas and digester gas flow rates to S-14 and S-15 (dry basis);
- b. concentrations (dry basis) of carbon dioxide (CO₂), nitrogen (N₂), oxygen (O₂), methane (CH₄), and non-methane organic compounds (NMOC) in the landfill gas and digester gas; and concentration (dry basis) of hydrogen sulfide in digester gas;
- c. exhaust gas flow rates from S-14 and S-15 (dry basis);
- d. concentrations (dry basis) of NO_x, CO, NMOC, [SO₂](#), and O₂ in the exhaust gas from S-14 and S-15;
- e. the NMOC destruction efficiency achieved by S-14 and S-15; and
- f. the average air to fuel ratio setting range and exhaust gas oxygen content range, or other proposed key emission control system operating parameters approved by the APCO, for S-14 and S-15 that is required to maintain compliance with part 4 above and Regulation 8-34-301.4.

(Basis: BACT, and Regulations 8-34-301.4, 8-34-412, [9-1-302](#), 9-8-302.1, and 9-8-302.3)