

## TITLE V COMPLIANCE ACTIVITIES

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The following sections summarize the compliance activities for the January 1, 2013, through June 30, 2013, period.

### 2.1 AUXILIARY BOILERS NO. 1 AND NO. 2 (S-7 AND S-8)

Both Auxiliary Boilers were operated on natural gas (NG) and landfill gas (LFG) during the reporting period. The flow meters for both gases were operable, and the hourly data was collected and electronically archived. Neither Auxiliary Boiler exceeded the 28 million British thermal unit (BTU)/hour permit requirement for the reporting period.

When operating on LFG, the three clock hour first-pass temperatures for both Auxiliary Boiler No. 1 (S-7) and No. 2 (S-8) were above the minimum 770 degrees Fahrenheit permit limit 100 percent of the operating time during the reporting period (Appendix A). The next annual tune-up, insulation check, exhaust temperature check, and emissions source test is due in November 2013.

### 2.2 FURNACES NO. 1 AND NO. 2 (S-9 AND S-10)

Only Furnace No. 1 (S-9) was in operation during the reporting period. The solid fuel throughput to S-9 did not exceed the daily limit of 120 tons/day or the annual limit of 20,000 dry tons/365 days. S-9 did not exceed the hourly auxiliary fuel limit of 27 MMBtu/hour.

On March 26, 2013, S-9 exceeded the opacity limit of 20 percent for 3 minutes and 50 seconds. The opacity excursion was properly reported to BAAQMD and assigned Identification Number 06J97. BAAQMD Inspector Peter Calimeris conducted a follow-up site visit for the March 26, 2013, opacity excursion. BAAQMD concluded that the opacity excursion was not an excess and no further enforcement actions was taken.

On June 20, 2013, S-9 exceeded the opacity limit of 20 percent for 3 minutes and 20 seconds. The opacity excursion was properly reported to BAAQMD and assigned Identification Number 06K91.

The temperature of Hearth No. 1 was above 1,000 degrees Fahrenheit 100 percent of the time when S-9 was firing on landfill gas. The wet scrubber pressure drop for S-9 was above the minimum 5.9 inches of water column reporting limit for 100 percent of the reporting period (Appendix B). The Hearth No. 2 oxygen (O<sub>2</sub>) levels for S-9 were below the 10 percent O<sub>2</sub> reporting limit for 100 percent of the reporting period (Appendix C). The total hydrocarbon (THC) emissions were well below the limit of 100 ppm corrected to 7 percent O<sub>2</sub>.

The annual source test on S-9 for non-methane organic compounds (NMOC) concentration and sulfur dioxide (SO<sub>2</sub>) was completed on March 5-7 and March 19-21, 2013, by Blue Sky Environmental, Inc. The final source test report was

submitted to BAAQMD on May 7, 2013. The final source test results show that flue gas concentrations of NMOC and SO<sub>2</sub> were well below the emission limits of 120 ppm NMOC at 3 percent O<sub>2</sub> and 300 ppm dry SO<sub>2</sub>.

### **2.3 COGENERATION (S-188)**

During the reporting period, nitrogen oxides (NO<sub>x</sub>) emissions from Cogeneration (S-188) did not exceed the maximum limits of 42 ppm NO<sub>x</sub> at 15 percent O<sub>2</sub>, 118 pounds of NO<sub>x</sub> per day, 19.834 tons of NO<sub>x</sub> per the previous 12 months, and 2.12 pounds NO<sub>x</sub>/MW-hr. All span and zero calibrations for the NO<sub>x</sub> continuous emission monitor were within limits during the entire reporting period.

The NG feed rate to the Cogeneration Unit did not exceed the permit limit of 1,188 MM BTU/day (HHV) during the reporting period.

### **2.4 SLUDGE CAKE VOLATILE CONTENT**

Sludge cake solids content is measured on all three work shifts each day. The volatile fraction of the cake solids is measured daily, and the volatile content varies slightly from day to day.

### **2.5 VISIBLE EMISSIONS EVALUATION (S-182, A-186, A-191, A-192, and A-196)**

Sources S-182, A-186, A-191, A192, and A-196 were monitored for visible emissions daily during the reporting period. No visible emissions were observed.

### **2.6 GASOLINE DISPENSING FACILITY (S-25)**

The gasoline dispensing facility passed the annual vapor recovery system test on April 1, 2013. No issues were noted during the annual test.

Throughput for the gasoline dispensing facility is recorded monthly. The gasoline dispensed for the past 12 months was approximately 721 gallons (Appendix D). This is considerably less than the limit of 400,000 gallons in any consecutive 12-month period.

### **2.7 ADDITIONAL TITLE V ACTIVITY**

CCCSD's Title V Permit Renewal Application is currently under review by BAAQMD.

On April 1, 2013, the leak detection system of the 2,000-gallon diesel tank near the Standby Power Facility was successfully inspected.

On April 3, 2013, BAAQMD Inspector Peter Calimeris conducted a Title V site inspection. CCCSD's Title V compliance records were reviewed, and Mr. Calimeris noted no Title V related compliance issues.