

February 1, 2000

**Central Contra Costa Sanitary District**  
5019 Imhoff Place  
Martinez, CA 94553-4392

Attention: Charles W. Batts

**Application Number: 25827**  
**Plant Number: A0907**  
**Equipment Location:**  
**Same as Above**

Dear Mr. Batts:

The requirements for public and EPA review of the proposed Major Facility Review Permit for the facility identified above have been completed. The District has made a decision to issue the Major Facility Review Permit.

The District received no comments from EPA or the public. However, the District acknowledges receipt of comments from Randy Schmidt, your contact.

The response to the comments is as follows:

### **I. Standard Conditions**

Item 7 Compliance Certification

The "Responsible Official" (R/O) must be the individual defined in Regulation 2, Rule 6. Based on discussions with Mr. Randy Schmidt, it appears the R/O would be Charles W. Batts, General Manager of CCCSD.

### **II. Equipment**

Table IIA – Permitted Sources:

Table IIB – Abatement Devices:

The names of S120, S140, S170, and A4 will be changed in the permit.

### **VI. Permit Conditions**

Condition 193: CCCSD requests a modification of the condition – specifying 10 or more confirmed odor complaint triggering installation of an H2S monitoring network. The District does not agree with CCCSD that installation of an H2S monitoring network is necessarily the correct remedy for odorous problems. While the current condition may need improvement, a permit condition change such as this requires more analysis. This issue should be addressed in a future permit application.

Condition 1716: CCCSD suggested “delete Part 2”. The District sees these issues as being similar to those around Condition 193, above. See our reply to the above comment.

CCCSD suggested adding parts 3, 4, and 5 to deal with particulate emissions: The District does not agree that these additional requirements should be included in the Title V permit conditions. These requirements are noted in other locations in the Title V Permit (See Table IV-E Citation). The purpose of the permit conditions is not to list each and every requirement. In the interest of smooth operation, CCCSD may decide to prepare a guidance document for operations personnel which would contain every requirement – including all permit conditions as well as every other requirement seen to be important to CCCSD. Permit conditions are developed to list the most important operating, monitoring and recordkeeping guidelines that are seen to be of special significance to the facility in question. Conditions do not reiterate every single air quality requirement of a facility. There is no statutory requirement that the Table IV citations be included in the permit conditions.

Condition 7055: CCCSD suggested adding parts 6, 7, and 8 to deal with issues of particulate emissions. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Condition 7124: CCCSD suggested deleting Part 2. The District agrees that Part 2 may be redundant, but we are hesitant to remove this requirement. There is no statutory requirement to remove this portion of condition 7124.

Condition 13082: CCCSD suggested replacing sludge handling name. The District agrees and will make this replacement.

CCCSD suggested adding Part 3, 4, and 5 to deal with issues of particulate emissions: The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Condition 13271: Part 1: CCCSD suggested adding S188 firing rate limit. The District agrees that this should be added to this condition. Monitoring for this limit has been added to part 15.

Part 7: CCCSD suggested noting SO<sub>2</sub> concentration correction basis. The District agrees that this should be added to this condition.

Part 14: CCCSD suggested noting NO<sub>x</sub> emissions correction basis. The District agrees that this should be added to this condition.

Part 15: CCCSD suggested adding Part 15 as follows: “In order to show compliance with Part 14, the permittee shall operate a BAAQMD approved fuel flow meter and water injection flow monitor and calculate the water fuel ration on a clock-hour basis”. The District agrees that this should be added to this condition, but *U.S. EPA* substituted in place of *BAAQMD*. Also, CCCSD shall use the fuel monitor to determine compliance with part 1b.

Part 16: CCCSD suggested adding Part 16 dealing with ground level concentrations of SO<sub>2</sub>. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Part 17: CCCSD suggested additional specification on exhaust gas emissions SO<sub>2</sub> concentrations. The District agrees these requirements should be added with the stipulation that there is no % oxygen correction noted in Regulation 9, Rule 1. All recommended language will be added except for the % oxygen correction. Further, 150 ppm has been set as the threshold for a relaxed monitoring frequency in condition #16562. The condition will be changed to match the language in condition #16562.

Part 18: CCCSD suggested addressing the sulfur content of gaseous fuels as well as the means to measure same for compliance with the NSPS, Subpart GG. The proposed permit contains the citation for the limit (40 CFR 60.333) and for the monitoring (40 CFR 60.334(b)), which requires daily monitoring of fuel sulfur and nitrogen if there is no intermediate bulk storage. This requirement could be removed by approval for a "custom schedule" for the fuel pursuant to 40 CFR 60.334(b)(2) or by subsuming the monitoring using the permit shield. Since CCCSD burns landfill gas in the turbine rarely, CCCSD has decided to ask for a permit shield for the fuel sulfur monitoring requirement during the burning of natural gas, and for the nitrogen content monitoring in all cases. The fuel sulfur monitoring requirement will be subsumed only for the burning of natural gas by the requirement to burn PUC quality natural gas. The nitrogen content monitoring will be subsumed by the requirement for NO<sub>x</sub> CEMs. Of course, the NO<sub>x</sub>, fuel sulfur, and SO<sub>2</sub> limits are not subsumed.

Parts 19, 20, 21, and 22: The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Part 23: CCCSD suggested adding organic compound abatement efficiencies across S188, effective 7/1/2002. The District agrees that this should be added to this condition. The citation will be changed from 8-34-114 to 8-34-301.4.

Condition 16562: CCCSD suggested replacing the current Part 2 requirements with a revised Part 2 specifying SO<sub>2</sub> dry, corrected to 3% oxygen. Other CCCSD suggestion was to allow relaxed monitoring frequency based on 300 ppm dry, at 3% oxygen. The District does not agree that Part 2 should be changed as suggested. Regulation 9, Rule 1 does not specify any correction to any % oxygen concentration. Further, 150 ppm has been set as the threshold for relaxed monitoring frequency. No changes are necessary for the current Condition 16562 Part 2.

Part 10: CCCSD suggested adding Part 10 to address natural gas curtailment. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Part 11: CCCSD suggested adding Part 11 to deal with NO<sub>x</sub> emissions during periods of equipment testing. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Parts 12 and 13: CCCSD suggested adding Parts 12 and 13 to deal with CO emissions during natural gas curtailment and equipment testing periods. This request does not appear to be necessary since the standard is 400 ppm and doesn't change as a function of different operating modes. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Part 14, 15, 16, 17: CCCSD suggested adding Part 14 to deal with ground level concentrations of SO<sub>2</sub>, as well as Parts 15, 16, and 17. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Part 18: CCCSD suggested adding Part 18 to deal with organic compound abatement efficiencies across S7 and S8, effective 7/1/2002. The District agrees that this should be added to this condition.

Condition 16563: Part 11: CCCSD suggested adding a % oxygen to use in correcting the SO<sub>2</sub> concentration. The District does not agree that this should be added as there is no % oxygen correction noted in Regulation 9, Rule 1.

Part 12: CCCSD suggested typographical changes to Part 12 identification of the sewage sludge incinerators. The District agrees with this recommendation and will make the necessary corrections. We have changed the number of this part to 12a and have noted that it expires July 1, 2002. Part 12b has been added to show the new requirement after July 1, 2002.

Parts 15, 16, 17, 18: CCCSD suggested adding Parts 15, 16, 17, 18 to deal with issues of GLC of SO<sub>2</sub>, visible emissions, particulate mass emissions, total organic compound leakage. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Part 19: CCCSD suggested adding Part 19 to deal with organic compound abatement efficiencies across S9 and S10, effective 7/1/2002. The District agrees that this should be added to this condition. We are also noting that part 8 expires on July 1, 2002.

Parts 20, 21: CCCSD suggested adding Parts 20 and 21 to deal with issues of GLC of SO<sub>2</sub> and lead. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Condition 16692: Part 2/Part 3: CCCSD suggested changing Part 3 to Part 2. Parts 1 and 2 were combined in error. The error has been corrected and now there are 3 parts.

Parts 4, 5: CCCSD suggested adding Parts 4 and 5 to deal with issues of particulate matter. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Condition 16693: Parts 4, 5, and 6: CCCSD suggested adding parts 4, 5 and 6 to deal with issues of particulate emissions. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

## **VII. Applicable Limits & Compliance Monitoring Requirements**

Tables to Revise: Table Items – Listed in Tables VII (Not In Conditions): We have reviewed the dark rows representing items listed in tables VII but not currently in the text of the respective permit conditions. The District notes that not all requirements listed in the permit conditions should be listed in the Table VII. These issues have been addressed in the previous discussion. CCCSD may very well deem it necessary to integrate the Conditions and Tables for operating convenience. There is no statutory requirement to provide additional integration of Table VII and the Operating Conditions.

Tables to Revise: Table Items – Listed in Conditions (Not in Table VII): We have reviewed the lightly shaded rows representing items listed in the permit condition but not currently in the test of the Table VII for the respective source. The District notes that not all requirements listed in the permit conditions should be listed in the Table VII. Specifically, Table VII is to list monitoring requirements associated with pollutant emissions and not general requirements. The District notes that those items included in the lightly shaded rows do not need to be included in the Tables. CCCSD may very well deem it necessary to integrate the Conditions and Tables for operating convenience. There is no statutory requirement to provide additional integration of Table VII and the Operating Conditions.

Tables to Add: CCCSD suggested adding Compliance Monitoring Tables VII-J, VII-K, and VII-L for sources 100, 110, and 120. There is no compliance monitoring per se at these sources. The District does not agree that these additional requirements should be included in the Title V permit conditions. See comments under Condition 1716, above.

Please be advised that the first monitoring report is due July 31, 2000.

Enclosed for your information is a copy of the final permit. If you have any questions regarding this proposed permit, please call Randy Frazier - Air Quality Engineer, at (415) 749-4672.

Very truly yours,

Signed by Ellen Garvey  
Ellen Garvey  
Executive Officer/Air Pollution Control Officer

Enclosure

cc: Randy Schmidt, Central Contra Costa Sanitary District

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