

Attachment 1
Response to Comments

Central Contra Costa Sanitary District Letter of January 13, 2015

Comment 1: Please change the responsible official to Ann K. Sasaki, P.E., Deputy General Manager, Phone #925-229-7131.

Response: The definition of “responsible official” for a municipality, State, Federal, or Other Public Agency in BAAQMD Regulation 2-6-223.3 is: “The principal executive officer or ranking elected official.” Staff for the facility has stated that Ms. Sasaki is directly responsible for the operation and maintenance of the plant and is therefore the principle executive officer for the plant. Therefore, the District agrees to this change.

Comment 2: Please correct the page numbering for pages 6 through 15.

Response: The page numbers have been fixed.

Comment 3: On page 10, in Table II-B, Abatement Devices, please add a “PM” designation to the limit of 80 microgram/dscm @ 7% O2 from 40 CFR 60, Subpart Mmmm, and state that the limit is effective on 3/21/16 for A2

Response: The District has made these changes.

Comment 4: On page 12, in Table II-B, Abatement Devices, please add the PM limits from 40 CFR 60, Subpart Mmmm and the parameters: scrubber liquid flow and pressure drop for A4.

Response: The District has made this correction.

Comment 5: On page 13, please delete A184 and A185 from Table II-B, Abatement Devices, because these are abatement devices for exempt sources.

Response: The District has made this correction.

Comment 6: On page 15, please revise the capacity of S194, Portable Engine, in Table II-C, Exempt equipment, from 95 hp to 54 hp.

Response: The District has made this correction.

Comment 7: On page 15, please revise the model of S198, Portable Engine, in Table II-C, Exempt equipment, from “C24AG098” to “D914L03.”

Response: The District has made this correction.

Comment 8: On page 28, please label all conditions under Subpart M MMMM
“effective 3/21/16.”

Response: The date has been added for the following citations:

<u>Citation</u>	<u>Description</u>
40 CFR 60.5085	What are my requirements for meeting increments of progress and achieving final compliance?
40 CFR 60.5085(a)	Submit a final control plan
40 CFR 60.5085(b)	Achieve a final control plan
40 CFR 60.5090	When must I complete each increment of progress?
40 CFR 60.5095	What must I include in the notifications of achievement of increments of progress?
40 CFR 60.5100	When must I submit the notifications of achievement of increments of progress?
40 CFR 60.5105	What if I do not meet an increment of progress?
40 CFR 60.5110	How do I comply with the increment of progress for submittal of a control plan?
40 CFR 60.5115	How do I comply with the increment of progress for achieving final compliance?
40 CFR 60.5120	What must I do if I close my SSI unit and then restart it?
40 CFR 60.5125	What must I do if I plan to permanently close my SSI unit and not restart it?
40 CFR 60.5135	When must the operator training course be completed?
40 CFR 60.5140	How do I obtain my operator qualification?
40 CFR 60.5145	How do I maintain my operator qualification?
40 CFR 60.5150	How do I renew my lapsed operator qualification?
40 CFR 60.5155	What if all the qualified operators are temporarily not accessible?
40 CFR 60.5160	What site-specific documentation is required and how often must it be reviewed by qualified operators and plant personnel?
40 CFR 60.5165	What emission limits and standards must I meet and by when?
40 CFR 60.5170	What operating limits and requirements

<u>Citation</u>	<u>Description</u> must I meet and by when?
40 CFR 60.5180	Do the emission limits, emission standards, and operating limits apply during periods of startup, shutdown, and malfunction?
40 CFR 60.5181	How do I establish an affirmative defense for exceedance of an emission limit or standard during malfunction?
40 CFR 60.5185	How and when do I demonstrate initial compliance with the emission limits and standards?
40 CFR 60.5185(a)	Demonstrate initial compliance using specified performance tests
40 CFR 60.5185l	Determine initial compliance with the dioxins/furans toxic equivalency emission limit
40 CFR 60.5185(d)	Submit an initial compliance report
40 CFR 60.5185l	Notify the administrator in case of force majeure
40 CFR 60.5190	How do I establish my operating limits?
40 CFR 60.5190(a)	Applicability of establishing operating limits
40 CFR 60.5190(b)	Determine minimum pressure drop
40 CFR 60.5190l	Determine minimum scrubber liquid flow rate
40 CFR 60.5190(d)	Determine minimum scrubber liquid pH
40 CFR 60.5190l	Determine minimum combustion chamber operating temperature
40 CFR 60.5200	How do I develop a site-specific monitoring plan for my continuous monitoring, bag leak detection, and ash handling systems, and by what date must I conduct an initial performance evaluation?
40 CFR 60.5200(a)	Address specified elements and requirements. Operate and maintain the continuous monitoring system according to the site-specific monitoring plan

<u>Citation</u>	<u>Description</u>
40 CFR 60.5200(d)	Specify ash handling system operating procedures
40 CFR 60.5200l	Alternative monitoring requirements
40 CFR 60.5200(f)	Submit monitoring plans required in (a) and (b) of this section at least 60 days before the initial performance evaluation of continuous monitoring system(s)
40 CFR 60.5200(h)	Update or resubmit monitoring plan for changes in monitoring procedures
40 CFR 60.5220	What are the performance testing, monitoring, and calibration requirements for compliance with the emission limits and standards?
40 CFR 60.5225	What are the monitoring and calibration requirements for compliance with my operating limits?
40 CFR 60.5225(a)	Install, operate, calibrate, maintain the continuous parameter monitoring systems as required
40 CFR 60.5225l	Operate and maintain the continuous parameter monitoring systems as specified
40 CFR 60.5230	What records must I keep?
40 CFR 60.5235	What reports must I submit?
40 CFR 60, Subpart M MMM, Table 3	Emission Limits and Standards for Existing Multiple Hearth Sewage Sludge Incineration Units
40 CFR 60, Subpart M MMM, Table 4	Operating Parameters for Existing Sewage Sludge Incineration Units
40 CFR 60, Subpart M MMM, Table 6	Summary of Reporting Requirements for Existing Sewage Sludge Incineration Units

Comment 9: On page 60, please set up the Hearth 2-11 temperature excursion reporting in Condition 21423, part 14f, on a clock hour basis.

Response: The District has added this clarification to Condition 21423, part 14d.

Comment 10: On page 60, please set up the volatile solid content of sewage sludge reporting in Condition 21423, part 14f, on a daily basis.

Response: The District has added this clarification to Condition 21423, part 14d.

Comment 11: On page 74, please correct the 40 CFR 60, Subpart GG, NO_x limit from 154 ppmvd at 15% oxygen to 167 ppmvd at 15% oxygen.

Response: The District has made this correction, since it is described in the Statement of Basis.

Comment 12: Condition 21485, part 13, on page 75, was deleted so injection water to fuel ratio is no longer a monitoring requirement. Please add a condition that the Water-to-fuel Ratio can be used as a parametric to demonstrate compliance in case of a NO_x CEMS failure.

Response: The District will allow the facility to use water-to-fuel monitoring during periods that the CEM is not working to show compliance with the NSPS limit of 167 ppmvd @ 15% O₂. The condition will be divided into two parts since use of the fuel meter is required to show compliance with the heat input limit in part 1b of Condition 21485. 40 CFR 60.334(a), regarding water-to-fuel monitoring, has been added to Tables IV-J and VII-G, with a note stating that it will only be used when the NO_x CEM is not operating.

Comment 13: Please modify Condition 24708, part 2, on page 78, to allow A197, Emergency Sludge Loading Facility, to operate for 100 hours per calendar year when S9 and/or S10 are available for reliability testing to ensure compliance with Condition 24708, part 1: "...that A197 is installed, operated, and maintained in good working order."

Response: This change requires an application for a change in conditions.

Comment 14: On page 80, please confirm that a portable analyzer for the annual compliance demonstrations for S7 and S8 is acceptable for NO_x and CO.

Response: A portable analyzer is allowed by BAAQMD Regulation 9-7-506 and mentioned in Table VII-A.

Comment 15: On page 81, Table VII-A, second to last row, sixth column over (Monitoring Requirement Citation), please change "part 2" to "part 3."

Response: The citation for the quarterly monitoring for compliance with BAAQMD Regulation 9-1-302 will be corrected from Condition 21422, part 2 to Condition 21422, part 3.

Comment 16: On page 81, Table VII-A, last row, sixth column over (Monitoring Requirement Citation), please change "part 9b" to "part 2."

Response: The citation for the monthly monitoring for compliance with BAAQMD Regulation 9-1-304 will be deleted because the facility uses California diesel, which contains 15 ppm sulfur by weight or less. Condition 21422, part 7b, has been amended to say "The owner/operator shall assume that the distillate oil contains 15 ppm sulfur by weight." The citation of the 0.5% sulfur by weight limit based on Condition 21422, part 6, has been deleted because part 6 does not contain this limitation.