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January 23, 2011

**BAY AREA AIR QUALITY
MANAGEMENT DISTRICT**

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

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RE: **Major Facility Semiannual Monitoring Report 2011, Facility A1209, Union Sanitary District.**

Enclosed is the Compliance Monitoring Report for the period July 1, 2011 through December 31, 2011 as required by Standard Conditions part IF of the Title V major facility permit for Union Sanitary District (District), facility number A1209.

Permit Compliance Summary

We are pleased to report that the facility was in compliance with all requirements of the Title V permit during the reporting period.

On July 22, 2011 the District reported noncompliance with the 12-month thermal capacity limitation for source S-16 for the previous compliance monitoring period (January 2011 through June 2011), using the prescribed calculation method to demonstrate compliance contained in condition 20905. However, after further evaluation, we realized that the digester gas heat content yielded by the calculation method prescribed in the permit condition which is based on the average percentage methane concentration of the last three source tests was higher than the 12-month average higher heating value measured by ASTM 3588-98 and substantially higher than the lower heating value that the thermal capacity limitation was based upon. As a result, we have concluded that the method of demonstrating compliance prescribed in the permit condition overestimates the thermal input to S-16, and the source maintained compliance with the thermal input capacity limit at all times. To prevent any further confusion, the firing rate of S-16 was reduced to a level that will allow the demonstration of compliance using the overly protective method prescribed in permit condition no.20905.

Monitoring Summary

All required monitoring was performed before June 30th of this year. As a result, no source testing was performed during this reporting period.

Sincerely,

David Livingston
Manager/Treatment & Disposal Services
Union Sanitary District

Cc: File