

8 July 2004

**Union Sanitary District  
5072 Benson Road  
Union City, CA 94587**

**Attention: Jim Chen, Coach, Treatment & Disposal**

**Re: Response to Comments on Draft MFR Permit**

**ALAMEDA COUNTY**

Roberta Cooper  
Scott Haggerty  
(Chairperson)  
Nate Miley  
Shelia Young

**CONTRA COSTA  
COUNTY**

Mark DeSaulnier  
Erling Horn  
Mark Ross  
Gayle Uilkema  
(Secretary)

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO  
COUNTY**

Chris Daly  
Jake McGoldrick  
Vacant

**SAN MATEO COUNTY**

Jerry Hill  
Marland Townsend  
(Vice-Chairperson)

**SANTA CLARA COUNTY**

Erin Garner  
Liz Kniss  
Patrick Kwok  
Julia Miller

**SOLANO COUNTY**

John F. Silva

**SONOMA COUNTY**

Tim Smith  
Pamela Torliatt

Jack P. Broadbent

**EXECUTIVE  
OFFICER/APCO**

**Dear Mr. Chen:**

This letter is to address your comments of June 9, 2004 regarding the draft Major Facility Review (MFR) Title V Permit for Union Sanitary District.

As we understand your letter, the majority of your comments fall into two categories, 1) issues surrounding NSR permit application 3319 for the sludge handling system revamp project as permitted in Application Number 3319, and 2) issues regarding the NOx and CO emission standards for S-15 and S-16 Cogeneration Engines. Each of these areas will be addressed in turn. Additional minor comments will be addressed after the above two areas of concern are discussed.

AN 3319 Sludge Dewatering Building Project: You commented that the new sludge dewatering building S-180, and the associated odor abatement scrubbers [should] be integrated into the Title V permit at this time. The sludge dewatering building, S-180, was permitted in 2002 (AN 3319), with a phased-in approach to installation and operation. Since the project was fully operational as of June, 2004, we agree that it should be integrated into the Title V permit. Accordingly, source S-180, as abated by A-31 and A-34 has been integrated into the Title V Permit and into the Statement of Basis. Source S-162 Sludge Handling, 5 Belt Filter Presses, has been archived and crossed out of the Title V permit and Statement of Basis. All other minor changes associated with the replacement of S-162 with S-180, as mentioned in your letter, have been incorporated into both the Statement of Basis and the Title V Operating Permit for Union Sanitary District.

S-15 and S-16 Cogeneration Engine(s) Conditions: You requested that the proposed condition wording allowing the use of either the g/bhp-hr standard or the equivalent ppm standard (for NOx and CO) be reworded to state that a violation of the standard would occur only when both standards were exceeded. We have reviewed your request and have determined that it is unnecessary to make any further changes to the condition wording in this regard. These conditions as currently worded are clear in their intent to provide a ppm standard that is equivalent to the g/bhp-hr standard. We expect that the exhaust gas ppm standards will be evaluated preferentially over g/bhp-hr. If the ppm standard is exceeded a violation notice would not be immediately issued. The facility would have an opportunity to demonstrate ultimate compliance with the g/bhp-hr standard.

**Application Number 3905**

**Plant 1209**

**08/05/04**

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Testing of Methane Content of Digester Gas: You commented that the additional testing for methane content in the digester gas (as noted in Conditions 20905 and 21298) is expensive and unnecessary. We have consulted with our laboratory manager who has informed us that the additional test for methane content is not a difficult test to perform and therefore may not be excessively expensive. This digester gas characterization is necessary to develop actual data from Union Sanitary District so that the heat throughput of the various digester gas combustion sources can be monitored and recorded. Once a statistically significant database is developed for USD then the regular sampling and testing schedule may be reconsidered as allowed by part 7 of Conditions 20905 and 21298.

Table VII-C: Monthly Monitoring of Heat Input to S-16: You commented that the engine heat throughputs are annual throughputs and therefore monthly monitoring is not required. This is partially correct. The fuel throughput limits are annual limits, but are calculated on a rolling 12-month basis. Therefore monthly compliance monitoring for both sources S-15 and S-16 is required to demonstrate compliance with the 12-month limit.

If you have any questions, please call me at **(415) 7749-4672 (fax 415-749-4949)**.

Very truly yours,

**Randy E. Frazier, P.E.**  
**Air Quality Engineer**