

Attachment A
City of Santa Rosa Wastewater Treatment
Review of BAAQMD's Draft Renewal Major Facility Review (Title V) Permit dated June 27, 2012
Application 23455; Plant A1403
Facility Comments with District Responses
November 1, 2012
Responses are in blue font color

Title Page

Facility Contact is Martin St. George (707) 543-3409; not Dean Paige.

Okay, will update the Facility Contact

SECTION II – Equipment List

Equipment List – pages 8-10

- Sources S-37 and S-38 have been removed from Table II A – Permitted Sources and placed on Table II C – Exempt Equipment because registered portable and non-road engines are exempt. These sources do not have a state-wide registration, but are permitted as portable sources through BAAQMD. Therefore these sources should be placed back on Table IIA. Additionally, they are listed as permitted sources on the current Facility PTO.

Table II C is for sources that are exempt from Title V per Regulation 2-6-114. Table II C does not list equipment that is exempt from BAAQMD permit requirements. Despite having District permits, the engines meet the definition of “non-road” engines per 40 CFR 89.2, Subpart A.

- Source 40 (Diesel Engine Compost Mixer) is not listed on Table II A, but is listed on Table II C. This source does not have a state-wide registration, but is permitted as a portable source through BAAQMD. Therefore this source should be placed back on Table IIA. Additionally, it is listed as a permitted source on the current Facility PTO.

Same response as previous.

Equipment List – page 9

- Source S-5 is listed as a source controlled by Abatement Device A-1 on Table II B – Abatement Devices. The current PTO does not include a S-5 source (see also Table IIA) and should not be listed on Table II B. This is an error in Permit condition 12848 that also needs to be correct in the current Facility PTO.

Okay. We will correct it

SECTION III – General Applicable Requirements

Table III – Generally Applicable Requirements

- Why is 2-1-429 called out specifically when Regulation 2 Rule 1 is called out in its entirety?
2-1-429 was adopted into the SIP separately from Regulation 2, Rule 1. See listing of BAAQMD SIP regulations - <http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions>

- BAAQMD Reg 2, Rule 5 is not applicable. It is contended that Regulation 2, Rule 5 is not currently applicable to this facility. In the description of Reg 2, Rule 5 it is stated that it is only applicable to new or modified sources.
We will remove Reg 2-5 from Table III. It is appropriately listed in section I.A.
- BAAQMD Reg 6, Rule 1 and SIP Reg 6 are not applicable to a facility, but to individual sources and not even all of those. It was called out as applicable for individual sources, where appropriate.
Because Regulation 6 can potentially apply to any Title V facility as well as exempt sources not listed in the Title V permit, it is included as a generally applicable requirement in all Title V permits.
- BAAQMD Reg 7 is not applicable. In the description of this regulation, it is stated that it is not applicable until the APCO receives odor complaints from ten or more complainants within a 90-day period.
Because Regulation 7 can potentially apply to any Title V facility as well as exempt sources not listed in the Title V permit, it is included as a generally applicable requirement in all Title V permits.
- BAAQMD Reg 8, Rule 1 is federally enforceable. Both the BAAQMD and the SIP list the date for Reg 8, Rule 1 as June 15, 1994, therefore, there is no reason to list both.
Okay, we will remove SIP Regulation 8, Rule 1.
- BAAQMD Reg 8, Rule 2 is not applicable to a facility, but to individual sources and not even all of those. It was called out as applicable for individual sources, where appropriate. Because Regulation 8, Rule 2 can potentially apply to any Title V facility, as well as exempt sources not listed in the Title V permit, it is included as a generally applicable requirement in all Title V permits.
- BAAQMD Reg 8, Rule 15 is not applicable. These are for emulsified and liquid asphalt in paving materials and paving and maintenance operations. This facility has no paving activities underway.
Because Regulation 8, Rule 15 can potentially apply to any Title V facility it is included as a generally applicable requirement in all Title V permits. Pursuant to Section I.B.12, the Title V permit holder is responsible for any contractors including paving contractors.
- BAAQMD Reg 8, Rule 40 and SIP Reg 8, Rule 40 are not applicable. These are for aeration of contaminated soil and removal of USTs. This facility has no remediation activities underway. Because Regulation 8, Rule 40 can potentially apply to any Title V facility, it is included as a generally applicable requirement in all Title V permits.
- BAAQMD Reg 8, Rule 47 and SIP Reg 8, Rule 47 are not applicable. These are for air stripping and soil vapor extraction. This facility has no remediation activities underway.
Because Regulation 8, Rule 47 can potentially apply to any Title V facility, it is included as a generally applicable requirement in all Title V permits.
Why aren't Reg 2, Rule 6 and Reg 3 listed? (Both have BAAQMD and SIP)
Regulation 3 does not contain emission limitations, and therefore is not listed as a Generally Applicable Requirement. Regulation 2, Rule 6 is listed in section I.A. of the permit.

SECTION IV – Source-Specific Applicable Requirements

Applicable Requirements for S-3 and S-4 (Table IV-A)

- 6-1-301 is not applicable; it only applies to point sources.
Regulation 6-1-301 applies to all sources of particulate emissions, not just those that are emitted through a stack.
- 6-1-401 is not applicable because 6-1-301 is not applicable.
Same response as previous
- Regulation 7 is not applicable. In the description of this regulation, it is stated that it is not applicable until the APCO receives odor complaints from ten or more complainants within a 90-day.
Okay. We will remove Regulation 7-303.

Applicable Requirements for S-17 and S-18 (Table IV-B)

- BAAQMD 8-2-301 is federally enforceable. Both the BAAQMD and the SIP list the date for 8-2-301 as May 21, 1980, therefore, there is no reason to list both.
Although the text of 8-2-301 is identical in the SIP version and the current BAAQMD version of the regulation, only the SIP version is federally-enforceable. Both are listed pursuant to Regulation 2-6-202 and 2-6-409.1.

Applicable Requirements for S-29 and S-31 (Table IV-C)

- 8-2-301 is not applicable. Internal combustion engines are exempt from Regulation 8 per 8-1-110.2.
The exemption listed in 8-1-110.2 is from Regulation 8, Rule 1 only, not all rules of Regulation 8. For example, 8-1-110.3 states that certain operations that are subject to Regulation 8, Rule 2 or Rule 4 are exempt from Regulation 8, Rule 1.
- The nature of the limitation of 9-1-301 is such that it cannot be applied to an individual source, only facility wide.
9-1-301 applies to any source of sulfur dioxide at a facility that can potentially contribute to ground-level concentrations of SO₂ outside of the facility boundaries.
- BAAQMD 9-1-302 is federally enforceable. Both the BAAQMD and the SIP list the date for 9-1-302 as February 16, 1983, therefore, there is no reason to list both.
Although the text of 9-1-302 is identical in the SIP version and the current BAAQMD version of the regulation, only the SIP version is federally-enforceable. Both are listed pursuant to Regulation 2-6-202 and 2-6-409.1.
- The nature of the limitation of 9-2-301 is such that it cannot be applied to an individual source, only facility wide.
9-2-301 applies to any source of H₂S at a facility that can potentially contribute to ground-level concentrations of H₂S outside of the facility boundaries.
- 9-8-301 is not applicable as the engines are not fired exclusively on natural gas.
Regulation 9-8-301 applies when the engines are fired exclusively on natural gas in the case of emergency.

- The engines are exempt from 40CFR63 Subpart ZZZZ and, as a consequence, Subpart A. The engines are subject to Subpart ZZZZ. Therefore, Subpart A will remain.

Applicable Requirements for S-33 and S-34 (Table IV-D)

- 8-2-301 is not applicable. Internal combustion engines are exempt from Regulation 8 per 8-1-110.2. The exemption listed in 8-1-110.2 is from Regulation 8, Rule 1 only, not all rules of Regulation 8. For example, 8-1-110.3 states that certain operations that are subject to Regulation 8, Rule 2 or Rule 4 are exempt from Regulation 8, Rule 1.
- The nature of the limitation of 9-1-301 is such that it cannot be applied to an individual source, only facility wide. 9-1-301 applies to any source of sulfur dioxide at a facility that can potentially contribute to ground-level concentrations of SO₂ outside of the facility boundaries.
- 9-8-110.5 is the correct exemption; 9-8-110.2 is not as the engines are greater than 50hp. Agree, correction will be made
- 9-8-331 is no longer enforceable and is no longer allowed by the ATCM (17CCR93115). 9-8-330 is the applicable requirement. Agree, correction will be made
- There is no Permit Condition 22820 listed in the current PTO. The Permit Condition applicable to S-33 and S-34 is 18856 of which there are 5 parts. Permit condition 22820 is a standard permit condition that has been assigned to all standby diesel engines subject to a 20 hour per year limit on reliability-related activities. It replaces the unique condition 18856.

Applicable Requirements for S-35 (Table IV-E)

- 8-2-301 is not applicable. Internal combustion engines are exempt from Regulation 8 per 8-1-110.2. The exemption listed in 8-1-110.2 is from Regulation 8, Rule 1 only, not all rules of Regulation 8. For example, 8-1-110.3 states that certain operations that are subject to Regulation 8, Rule 2 or Rule 4 are exempt from Regulation 8, Rule 1.
- The nature of the limitation of 9-1-301 is such that it cannot be applied to an individual source, only facility wide. 9-1-301 applies to any source of sulfur dioxide at a facility that can potentially contribute to ground-level concentrations of SO₂ outside of the facility boundaries.
- BAAQMD 9-1-302 is federally enforceable. Both the BAAQMD and the SIP list the date for 9-1-302 as February 16, 1983, therefore, there is no reason to list both. Although the text of 9-1-302 is identical in the SIP version and the current BAAQMD version of the regulation, only the SIP version is federally-enforceable. Both are listed pursuant to Regulation 2-6-202 and 2-6-409.1.

- The nature of the limitation of 9-2-301 is such that it cannot be applied to an individual source, only facility wide.
9-2-301 applies to any source of H₂S at a facility that can potentially contribute to ground-level concentrations of H₂S outside of the facility boundaries.
- 9-8-301 is not applicable as the engines are not fired exclusively on natural gas.
Regulation 9-8-301 applies when the engines are fired exclusively on natural gas in the case of emergency.
- The engines are exempt from 40CFR63 Subpart ZZZ and, as a consequence, Subpart A.
The engines are subject to Subpart ZZZZ. Therefore, Subpart A will remain.
- BAAQMD Permit Condition 19750-5 refers to NMHC emissions, not records. Agree, corrections will be made
- There is no part 9 to BAAQMD Permit Condition 19750 as it appears on the PTO; record keeping is included in part 8. Agree, corrections will be made

Applicable Requirements for S-37 and S-38

- All requirements were removed. As stated above, these sources do not have a state-wide registration, but are permitted as portable sources through BAAQMD. Therefore requirements for these sources should be listed. Additionally, they are listed as permitted sources on the current Facility PTO.
S-37 and S-38 are exempt from Title V per Regulation 2-6-114 because they meet the definition of “nonroad engine” per 40 CFR 89.2, Subpart A.

Applicable Requirements for S-40

- There are no requirements listed for this source. As stated above, this source does not have a state-wide registration, but is permitted as portable source through BAAQMD. Therefore requirements for this source should be listed. Additionally, it is listed as permitted source on the current Facility PTO.
S-40 is exempt from Title V per Regulation 2-6-114 because it meets the definition of “nonroad engine” per 40 CFR 89.2, Subpart A.

Applicable Requirements for S-100 (Table IV-F)

- Regulation 7 is not applicable. In the description of this regulation, it is stated that it is not applicable until the APCO receives odor complaints from ten or more complainants within a 90-day.
Okay. We will remove Regulation 7-303.
- BAAQMD 8-2-301 is federally enforceable. Both the BAAQMD and the SIP list the date for 8-2-301 as May 21, 1980, therefore, there is no reason to list both.
Although the text of 8-2-301 is identical in the SIP version and the current BAAQMD version of the regulation, only the SIP version is federally-enforceable. Both are listed pursuant to Regulation 2-6-202 and 2-6-409.1.
- There is only one part to permit condition 947 as it appears on the PTO; consequences of odor complaints.
The permit condition 947 has been updated in the previous renewal and the current renewal to reflect the District’s Requirements.

Applicable Requirements for S-110, S-120, S-130, S-140, S-150, S-160 and S-170 (Table IV-G)

- Permit condition 947 is not applicable to these sources.
[Agree.](#)
- Permit condition 784 (not listed), of which there is one part, is applicable to source S-130 only.
[Agree, will replace condition 947 with condition 784. To be consistent, Condition 784 will also be applicable to other sources \(S-110, S-120, S-140, S-150, S-160, and S-170\).](#)

Applicable Requirements for S-190 (Table IV-H)

- BAAQMD 8-2-301 is federally enforceable. Both the BAAQMD and the SIP list the date for 8-2-301 as May 21, 1980, therefore, there is no reason to list both.
[Although the text of 8-2-301 is identical in the SIP version and the current BAAQMD version of the regulation, only the SIP version is federally-enforceable. Both are listed pursuant to Regulation 2-6-202 and 2-6-409.1.](#)
- The nature of the limitation of 9-2-301 is such that it cannot be applied to an individual source, only facility wide.
[9-2-301 applies to any source of H₂S at a facility that can potentially contribute to ground-level concentrations of H₂S outside of the facility boundaries.](#)
- Permit condition 18871-5 is not listed.
[Okay. We will add section 5 of condition 18871 to the table.](#)

Applicable Requirements for S-200, S-201, S-202 and S-203 (Table IV-I)

- 8-2-301 is not applicable. Internal combustion engines are exempt from Regulation 8 per 8-1-110.2.
[The exemption listed in 8-1-110.2 is from Regulation 8, Rule 1 only, not all rules of Regulation 8. For example, 8-1-110.3 states that certain operations that are subject to Regulation 8, Rule 2 or Rule 4 are exempt from Regulation 8, Rule 1.](#)
The nature of the limitation of 9-1-301 is such that it cannot be applied to an individual source, only facility wide.
[9-1-301 applies to any source of sulfur dioxide at a facility that can potentially contribute to ground-level concentrations of SO₂ outside of the facility boundaries.](#)
- BAAQMD 9-1-302 is federally enforceable. Both the BAAQMD and the SIP list the date for 9-1-302 as February 16, 1983, therefore, there is no reason to list both.
[Although the text of 9-1-302 is identical in the SIP version and the current BAAQMD version of the regulation, only the SIP version is federally-enforceable. Both are listed pursuant to Regulation 2-6-202 and 2-6-409.1.](#)
- 9-8-301 is not applicable as the engines are not fired exclusively on natural gas.
[Regulation 9-8-301 applies when the engines are fired exclusively on natural gas in the case of emergency.](#)
- Per 63.6590(c)(1) the sources must meet requirements in 40CFR part 60 subpart JJJ. No further requirements, including subpart A, apply.
[Agree, will remove 40CFR63 subpart A requirements](#)

- Why wasn't 40CFR60.4237 (monitoring requirements) listed?
S-200, S-201, S-202, and S-203 are not considered to be "emergency engines" under 40CFR60.4248, and therefore 40 CFR 60.4237 is not applicable.
- 40CFR4243(g) is not applicable. Neither three-way catalysts nor NSCR are used on these engines.
Agree, will remove this requirement.

SECTION VI – Permit Conditions

Condition 947 (S-100)

- The permit conditions do not match the current PTO.
The condition is modified over the Title V renewal process to reflect current applicable requirements.

Condition 12848 (S-3, S-4)

- The permit conditions do not match the current PTO.
Part 2 of the Condition is deleted since the start-up was performed. Minor modifications will be made to other items to clarify the conditions with no changes to the applicable requirements.

Condition 22820 (S-33, S-34)

- There is no Permit Condition 22820 listed in the current PTO. The Permit Condition applicable to S-33 and S-34 is 18856 of which there are 5 parts.
Permit condition 22820 is a standard permit condition that has been assigned to all standby diesel engines subject to a 20 hour per year limit on reliability-related activities. It replaces the unique condition 18856.

Condition 18867 (S-29, S-31)

- The permit conditions do not match the current PTO.
Part 1 is modified during the Title V renewal process to reflect current applicable requirements. Other sections are modified to clarify the permit requirements.

Condition 18871 (S-190)

- The permit conditions do not match the current PTO.
The condition is modified to clarify the permit requirements. No applicable requirements were added/removed from the permit.

Condition 19750 (S-35)

- The permit conditions do not match the current PTO.
Part 7 of the original permit condition was removed since the start-up process was complete. Other sections are modified to clarify the permit requirements.

Condition 24751 (S-200, S-201, S-202, S-203)

- The permit conditions do not match those listed in the ATC issued on September 23, 2010. The condition is modified to clarify the permit requirements. No applicable requirements were added/removed from the permit.

Condition 784 (S-130)

- This condition is not included.
Agree, condition 784 will be added to the Permit, and Condition 784 will be applied to S-110, S-120, S-140, S-140, S-150, S-160, and S-170 in addition to S-130.
- Condition 947 was incorrectly listed as applicable to S-110, S-120, S-130, S-140, S-150, S-160, and S-170.
Agree, will remove condition 947 for those sources

Conditions 19192 (S-37, S-38) and 23495 (S-40)

- These conditions are not included.
- As stated above, these sources do not have a state-wide registration, but are permitted as portable sources through BAAQMD. Therefore conditions for these sources should be listed. Additionally, they are listed as permitted sources on the current Facility PTO.
S-37, S-38, and S-40 are exempt from Title V per Regulation 2-6-114 since the engines meet the definition of “non-road” engines per 40 CFR 89.2, Subpart A. The permit conditions for these sources will be retained in the District’s Permit but not in the Federal Title V permit.

SECTION VII – Applicable Limits & Compliance Monitoring Requirements

The most stringent limits for each source were reviewed.

Applicable Limits and Compliance Monitoring Requirements for S-3 and S-4 (Table VII-A)

- 6-1-301 is not applicable; it only applies to point sources.
Regulation 6-1-301 applies to all sources of particulate emissions, not just those that are emitted through a stack.

Applicable Limits and Compliance Monitoring Requirements for S-29 and S-31 (Table VII-C)

- 6-1-310. 0.5 grains per dscf should be 0.15 gr per dscf.
Agree, correction will be made
- The nature of the limitation of 9-1-301 is such that it cannot be applied to an individual source, only facility wide.
9-1-301 applies to any source of sulfur dioxide at a facility that can potentially contribute to ground-level concentrations of SO₂ outside of the facility boundaries.
- 9-8-301 is not applicable as the engines are not fired exclusively on natural gas.
Regulation 9-8-301 applies when the engines are fired exclusively on natural gas in the case of emergency.
- Limits for 9-8-302.1 are listed twice; once correctly and once incorrectly.
The BAAQMD Regulation 9-8-302.1 NO_x limits will be corrected to reflect the current emissions requirements
- The NO_x limits listed under permit condition 18867 part 1 are incorrect.
The NO_x emissions under Condition 18867 are correct according to Regulation 9-8

- Permit condition 18867 part 1 does not list monitoring requirements.
Agree, 18867 part 4 will put in the monitoring requirements citation section.

Applicable Limits and Compliance Monitoring Requirements for S-33 and S-34 (Table VII-D)

- 6-1-303 is not applicable
Regulation 6-1-303 applies since the engines considered to be a standby source of motive power per 6-1-303.1.
- Limits from 6-1-301 should be listed
Regulation 6-1-301 does not apply since 6-1-303 applies to S-33 and S-34

Applicable Limits and Compliance Monitoring Requirements for S-35 (Table VII-E)

- The nature of the limitation of 9-1-301 is such that it cannot be applied to an individual source, only facility wide.
9-1-301 applies to any source of sulfur dioxide at a facility that can potentially contribute to ground-level concentrations of SO₂ outside of the facility boundaries.
- 9-8-301 is not applicable as the engines are not fired exclusively on natural gas.
Regulation 9-8-301 applies when the engines are fired exclusively on natural gas in the case of emergency.
- Limits for 9-8-302.1 are listed twice; once correctly and once incorrectly.
One of the 9-8-302.1 are SIP standards and the other one is the current BAAQMD Standards. The BAAQMD Regulation will be corrected to Non-Federal Enforceable.
- The NO_x limits listed under permit condition 19750 part 3 are incorrect.
The NO_x emissions under Condition 19750 part will be updated according to Regulation 9-8
- Permit condition 19750 part 8 does not list monitoring requirements for thermal throughput, part 9 does.
Part 8 lists the monitoring requirements for thermal throughput, part 9 is deleted.

Applicable Limits and Compliance Monitoring Requirements for S-190 (Table VII-I)

- Should be Table VII-G
Agree, correction will be made

Applicable Limits and Compliance Monitoring Requirements for S-200, S-201, S-202, and S-203 (Table VII-J)

- Should be Table VII-H
Agree, correction will be made
- 9-8-301 is not applicable as the engines are not fired exclusively on natural gas.
Regulation 9-8-301 applies when the engines are fired exclusively on natural gas in the case of emergency.
- Limits for 9-8-302.1 are listed twice; once correctly and once incorrectly.
One of the Regulation 9-8-302.1 Standard is SIP standards and the other one is the current BAAQMD Standards. Both of them are listed correctly

- The units for the CO limits listed under Permit Condition 24751, part 5 do not match the units in the ATC. The units have corrected from g/hp-hr to g/bhp-hr to match the permit condition in the current ATC
- The nature of the limitation of 9-1-301 is such that it cannot be applied to an individual source, only facility wide.
9-1-301 applies to any source of sulfur dioxide at a facility that can potentially contribute to ground-level concentrations of SO₂ outside of the facility boundaries.
- 8-2-301 is not applicable. Internal combustion engines are exempt from Regulation 8 per 8-1-110.2. The exemption listed in 8-1-110.2 is from Regulation 8, Rule 1 only, not all rules of Regulation 8. For example, 8-1-110.3 states that certain operations that are subject to Regulation 8, Rule 2 or Rule 4 are exempt from Regulation 8, Rule 1.

Applicable Limits and Compliance Monitoring Requirements for S-37, S-38 and S-40

- These limits and requirements are not included.
- As stated above, these sources do not have a state-wide registration, but are permitted as portable sources through BAAQMD. Therefore limits and requirements for these sources should be listed. Additionally, they are listed as permitted sources on the current Facility PTO.
S-37, S-38, and S-40 are exempt from Title V per Regulation 2-6-114 because they meet the definition of “non-road engine” per 40 CFR 89.2, Subpart A. They are not exempt from BAAQMD permit requirements.

SECTION VIII – Test Methods

- 6-1-303 is not applicable to any of the sources currently listed. It is applicable to S-37, S-38 and S-40.
6-1-303 also applies to S-33 and S-34, as explained in the Limits and Compliance Monitoring Requirements for S-33 and S-34
- Regulation 7 is not applicable. In the description of this regulation, it is stated that it is not applicable until the APCO receives odor complaints from ten or more complainants within a 90-day.
Okay, will remove Regulation 7-303 from the table.
- 9-8-301 is not applicable as the engines are not fired exclusively on natural gas.
Regulation 9-8-301 applies when the engines are fired exclusively on natural gas in the case of emergency.