

District Response to Comments from City of Santa Rosa Wastewater Treatment on proposed  
Title V Renewal Permit

Plant A1403  
Application 23555  
April 24, 2013

Comment #1:

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.

While the argument for including some regulations as generally applicable (such as Rule 8-3 or Rule 8-15) since operations regulated by these rules are generally not subject to permitting, air stripping and soil vapor extraction activities subject to Rule 8-47 are generally required to be permitted. Permitting actions would trigger a modification to the Title V Permit, therefore, Rule 8-47 should not be included unless covered activities are actually occurring.

Response:

Regulation 8, Rule 47 and SIP Regulation 8, Rule 47 are listed in the "Generally Applicable Requirements" table of all Title V permits issued by the District. The regulation is included to cover the potential future installation and operation of soil or groundwater remediation equipment. The citation of this regulation in the permit will not require any monitoring, recordkeeping, or reporting on your part unless a regulated remediation activity occurs at your facility.

Comment #2:

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

- 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. During an emergency, the engines are not subject to this rule per exemption 9-8-110.5. It is requested that 9-8-301 be removed from the referenced Applicable Requirements.

Response:

Under current District policy, the emission limitations of Regulation 9-8-301 apply to any discretionary-use engine when it is fired on 100% natural gas, even if it can also be fired on a mixture of digester gas and natural gas at other times. In keeping with this policy, the existing and renewal Title V permit cites 9-8-301 as an applicable requirement for S-35 IC Engine. Similarly, 9-8-301 will be listed as an applicable requirement for S-200, S-201, S-202, and S-203. Furthermore, if 9-8-301 did not apply, then the engines would not be subject to any NO<sub>x</sub> emission concentration limit when firing 100% natural gas. This certainly is not the intent of Regulation 9, Rule 8.

Please note that although the scenario where these engines are fired on 100% natural gas may be considered an operational "emergency" because digester gas is not available, the engines do not meet the definition of emergency standby engine as given in 9-8-230 and therefore do not qualify for the exemption cited in 9-8-110.5. Under District regulations, an engine is classified as either a discretionary-use engine or an emergency standby engine. It cannot switch back and forth depending on the operating scenario.