Water Pollution Control Plant
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July 31, 2026

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

TV Tracking #1411: (Semi-Annual)
1. ☐ RECEIVED IN ENFORCEMENT: 07/30/2026

Attn: Title V Reports

Re: Semiannual Monitoring Report, City of Sunnyvale Water Pollution Control Plant, Facility No. A0733

To Whom It May Concern:

Per Section I, Part F of its Title V permit, the City of Sunnyvale Water Pollution Control Plant (Facility No. A0733) is submitting this Semiannual Monitoring Report for the period from January 1 through June 30, 2026. After reasonable inquiry, we conclude the following regarding this period of operation:

- S-15 Source Test exceeded limits for NMOC. The retest was compliant.
- All reports were submitted on time; and
- All CEM QA procedures, methodologies, and maintenance were performed as required.

PGF Input Heat Limits Monitoring [Condition 10844(2)]:

S-14 and S-15 gas throughput for each fuel type is monitored continuously at five-second intervals on a daily basis, well in compliance with the required 15-minute interval. Monthly samples are collected from each fuel stream and analyzed for the high-heat value, which is used with the gas throughput to calculate the daily and consecutive 12-month total heat inputs for each engine to determine compliance with the respective limits.

The IHV values for both engines were maintained below the 200 MMBTU limit during the reporting period.

Source Test [BAAQMD 8-34-301.4; Condition 10844(6)]:

On January 20-21, 2026, a source test was conducted for S-14 and S-15 as scheduled, with Blue Sky Environmental, as required by permit condition 10844, Part 6. During the testing, Blue Sky deviated from their own test plan. The test plan indicated USEPA Method 18 was to be used to quantify and subsequently subtract methane from the NMOC (Non-Methane Organic Compounds) result, however

USEPA Method 25C was used which is less accurate since Method 25C cannot explicitly identify methane and exclude it.

On February 13, 2026, Sunnyvale was notified by Blue Sky Environmental that an incorrect test method had been used and that the resulting test data would be invalid. Based on this information, Sunnyvale submitted a Deviation Report for S-14 on February 20, 2026, because Sunnyvale believed the required source test had not been properly completed in time for S-14. A retest of both engines was subsequently scheduled for February 23–24, 2026.

The result for the initial test on January 21, 2026, for S-15 was 177.4 NMOC, ppmvd @3% O2 with a limit of 120. Additionally, the test result for NMOC, g/bhp-hr was 0.361 with a limit of 0.3. The retest on February 24 had a result of 62.3 for NMOC, ppmvd @3% O2 and NMOC g/bhp-hr had a result of 0.1. The final report was submitted to the Air District on April 6, 2026.

PGF Combustion Temperature Monitoring [Condition 10844(8)]:

The thermocouple data collected during this reporting period is accurate, and reflective of the operating conditions of S-14 and S-15, and in compliance with Condition 10844(8).

PGF Quarterly Emissions Monitoring [9-8-503, 9-8-302.1, 9-8-302.3]:

First and second quarter emissions monitoring events for S-14 and S-15 were conducted on January 7 and April 21, 2026, respectively. All results were in compliance with the applicable emissions limits of 70 ppm NOx and 2,000 ppm CO.

RICE Oil Change Frequency [Table 2d.13 of NESHAP 63.6603(a)]:

There were no exceedances of the 1,440-hour limit for oil and filter changes and hose and spark plug inspections, as established in Table 2d.13 of NESHAP 63.6603(a), for all applicable RICE engines at the facility.

Emergency Standby Diesel Generator Reliability-Related Activities [Condition 22850(1)]:

During the reporting period, reliability-related activities performed on the emergency standby diesel generators (S-26 and S-27) were in compliance with the limitation of ≤ 50 hours/year.

Landfill Gas Component System Leak Testing [8-34-301.2]:

On March 17, 2026, quarterly LFG component/leak emissions testing of the PGF and LFG Flare Station was performed. Most locations tested at the LFG flare were below the Rule 8-34 1000-ppmv limit and the LMR 500-ppmv limit during this initial monitoring event. However, two (2) locations, one at the Blower No. 1 seal and one at the Engine PGF-2 intake, exceeded one or both of the methane emissions limits with readings of 901 ppm and 1,340 ppm, respectively. City staff performed repairs to the seal at Blower No. 1 and completed maintenance at the PGF2 Engine prior to retesting by SCS on March 24, 2026. Results of retesting at these locations indicated both returned to compliance. No exceedances were detected at any

other location tested.

On May 4, 2026, PGF and LFG flare positive pressure component (e.g., leak/emissions) monitoring showed no exceedances of District Regulation 8, Rule 34 and LMR thresholds of 1,000 and 500 parts per million (ppm) for methane, respectively.

Landfill Gas Emission Control System [8-34-113.2]:

During the reporting period, the LFG emission control system was in compliance with the shutdown time limitation of ≤ 240 hours/year.

I am the responsible person for the City of Sunnyvale Water Pollution Control Plant. I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate and complete.

Please contact Julie Choun at (408) 730-7282 or jchoun@sunnyvale.ca.gov if you have any questions or comments on this report.

Sincerely,

Ramana Chinnakotla

Ramana Chinnakotla
Director, Environmental Services Department

2026 01-06 BAAQMD Semiannual Monitoring Report - Sunnyvale (Facility A0733)

Final Audit Report 2026-07-30

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