



January 30, 2025

Jeffrey Gove
Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale St. St. 600
San Francisco, CA 94105

TV Tracking #1072 (Semi-Annual)

1. RECEIVED IN
ENFORCEMENT: 01/30/2025

ATTN: TITLE V REPORTS

**RE: Semi-Annual Monitoring Report: July through December 2024 for City of Santa Rosa
Regional Water Reuse System, Permit for Facility #A1403**

Dear Mr. Gove:

In accordance with Permit Standard Conditions Section F, this letter is provided to fulfill semi-annual monitoring reporting required for the City of Santa Rosa (City) during the period July 1, 2024, through December 30, 2024. Pursuant to the monitoring requirements specified in the Permit, please note the following items regarding monthly and annual emissions testing:

Monthly Emission Testing and Annual Source Tests (Condition #24751)

During this period, monthly portable tests were conducted by Montrose Air Quality Services for emissions from digester/natural gas fueled internal combustion engines S-200, S-201, S-202, and S-203 on July 30, August 30, September 30, October 11, November 20, and December 6. Testing results are attached in Appendix A. Please note the following exceptions regarding engine testing:

- S-200 (Engine1) did not receive monthly testing in September or October, as it was out of service.
- S-201 (Engine 2) did not receive monthly testing in September, October, or November, as it was out of service.
- S-202 (Engine 3) did not receive monthly testing in July, August, or September as it was out of service.
- S-203 (Engine 4) did not receive monthly testing in July, August, September, or December as it was out of service.

Per the City of Santa Rosa's Title V permit, annual source testing is required to be conducted no later than 12 calendar months after the previous source test. As noted in a letter to the Bay Area Air Quality Management District dated December 2, 2024, the City was unable to complete source testing on S-201, S-202, and S-203 during the scheduled November 2024 source test and the engines were shut-down until the test could be completed. Sources S-201 and S-202 were retested in December of 2024 and S-202 continues to be shut-down for maintenance. The most recent source test dates and upcoming due dates are listed in the table below:

Source	Test Date	Next Due
S-200 Engine 1	November 2024	November 2024
S-201 Engine 2	December 2024	December 2025
S-202 Engine 3	December 2024	December 2025
S-203 Engine 4	November 2023	Engine Shut Down

Anaerobic Digesters Gas Conditioning (Condition #18871)

Weekly H₂S monitoring is conducted on the digester gas upstream of the iron sponge abatement device (A-200) for compliance with the sulfur limit of 1,500 ppm and downstream of A-200 for compliance with the H₂S content limit of 50 ppm. Results of these tests are attached with this report in Appendix B.

Emergency Generators (Condition #22820)

During the reporting period, reliability-related activities performed on the emergency standby diesel generators (S-33 and S-34) were in compliance with the limitation of less than 20 hours/year.

Thank you for your consideration of this matter. Please contact Heather Johnson, Environmental Services Officer at (707) 543-3472 for any information related to this report.

I certify that based on information and belief formed after reasonable inquiry, the statements and information in this letter are true, accurate, and complete.

Sincerely,



Jennifer Burke
Director of Santa Rosa Water

Enclosure:

Appendix A – Monthly Emission Testing Results

Appendix B – Digester Gas Quality Results

APPENDIX A
Monthly Monitoring Results



July 2024

October 9, 2024

To: Heather Johnson; Environmental Services Officer

Re: City of Santa Rosa Laguna WWTP
Monthly Engine CO/NOx Check

Ms. Johnson,

Attached are the results from our compliance check on your Internal Combustion Engines when corrected for 15% oxygen:

Engine #1 (S-200)	Engine #2 (S-201)
CO: 349.2 ppmvd	CO: 284.5 ppmvd
NO _x : 49.9 ppmvd	NO _x : 60.4 ppmvd

Measurements obtained on 07/30/2024 show that Engine S-200 parametric emissions are in excess of the CO "Action Limit" (348ppm corrected for 15% O₂).

Measurements obtained on 7/30/2024 are compliant with the parametric emissions limits required by the BAAQMD for internal combustion Engine S-201.

Please feel free to reach out to either myself (925) 680-4300 or VP, Technical Kevin Crosby (925) 680-4337 with any questions.

Regards,

Dan Duncan

Dan Duncan



August 2024

October 4, 2024

To: Heather Johnson; Environmental Services Officer

Re: City of Santa Rosa Laguna WWTP
Monthly Engine CO/NOx Check

Ms. Johnson,

Attached are the results from our compliance check on your Internal Combustion Engines when corrected for 15% oxygen:

Engine #1 (S-200)	Engine #2 (S-201)
CO: 355.3 ppmvd	CO: 282.2 ppmvd
NO _x : 52.9 ppmvd	NO _x : 55.8 ppmvd

Measurements obtained on 08/30/2024 show that Engine S-200 parametric emissions are in excess of the CO "Action Limit" (348ppm corrected for 15% O₂).

Measurements obtained on 08/30/2024 are compliant with the parametric emissions limits required by the BAAQMD for internal combustion Engine S-201.

Please feel free to reach out to either myself (925) 680-4300 or VP, Technical Kevin Crosby (925) 680-4337 with any questions.

Regards,

Dan Duncan

Dan Duncan

September 2024

November 7, 2024

To: Heather Johnson; Environmental Services Officer

Re: City of Santa Rosa Laguna WWTP
Monthly Engine CO/NOx Check

Ms. Johnson,

Attached are the results from our compliance check on your Internal Combustion Engines when corrected for 15% oxygen:

Engine #4 (S-203)
CO: 19.2 ppmvd
NO _x : 0.05 ppmvd

The test run for S-203 was abbreviated due to operator error. Averages are compiled from a test run of 9 minutes rather than the required 15 minutes. Testing on S-203 was reperformed for the required duration at the earliest opportunity, October 11 2024. Results from 10/11/24 will be presented in October's report.

Measurements obtained on 09/30/2024 are compliant with the parametric emissions limits required by the BAAQMD for internal combustion Engine S-203.

Please feel free to reach out to either myself (925) 680-4300 or VP, Technical Kevin Crosby (925) 680-4337 with any questions.

Regards,

Dan Duncan

Dan Duncan

October 2024

January 9, 2025

To: Heather Johnson; Environmental Services Officer

Re: City of Santa Rosa Laguna WWTP
Monthly Engine CO/NOx Check

Ms. Johnson,

Attached are the results from our compliance check on your Internal Combustion Engines when corrected for 15% oxygen:

Engine #3 (S-202)	Engine #4 (S-203)
CO: 1.3 ppmvd	CO: 36.3 ppmvd
NO _x : 11.8 ppmvd	NO _x : 0.0 ppmvd

Measurements obtained on 10/11/2024 are compliant with the parametric emissions limits required by the BAAQMD for internal combustion Engines S-202 and S-203.

Please feel free to reach out to either myself (925) 680-4300 or VP, Technical Kevin Crosby (925) 680-4337 with any questions.

Regards,

Dan Duncan

Dan Duncan

November 2024

January 10, 2025

To: Heather Johnson; Environmental Services Officer

Re: City of Santa Rosa Laguna WWTP
Monthly Engine CO/NOx Check

Ms. Johnson,

Attached are the results from our compliance check on your Internal Combustion Engines when corrected for 15% oxygen:

Engine #1 (S-200)	Engine #3 (S-202)	Engine #4 (S-203)
CO: 342 ppmvd	CO: 3.2 ppmvd	CO: 46.6 ppmvd
NO _x : 29.6 ppmvd	NO _x : 18.3 ppmvd	NO _x : 21.1 ppmvd

Measurements obtained 11/20/2024 meet the monthly portable analyzer testing requirements as outlined in PTO COND #24751, section 7 (b).

Please feel free to reach out to either myself (925) 680-4300 or VP, Technical Kevin Crosby (925) 680-4337 with any questions.

Regards,

Dan Duncan

Dan Duncan



M
2825 Verne Roberts Circle
Antioch, CA 94509
T: (925) 680-4300 F: (925) 680-4416
www.montrose-environmental.com

December 2024

January 27, 2025

To: Heather Johnson; Environmental Services Officer

Re: City of Santa Rosa Laguna WWTP
Monthly Engine CO/NOx Check

Ms. Johnson,

Attached are the results from our compliance check on your Internal Combustion Engines when corrected for 15% oxygen:

Engine #1 (S-200)	Engine #2 (S-201)	Engine #3 (S-202)
CO: 339 ppmvd	CO: 261 ppmvd	CO: 5.2 ppmvd
NO _x : 33.0 ppmvd	NO _x : 33.2 ppmvd	NO _x : 6.3 ppmvd

Measurements obtained 12/6/2024 meet the monthly portable analyzer testing requirements as outlined in PTO COND #24751, section 7 (b).

Please feel free to reach out to either myself (925) 680-4300 or VP, Technical Kevin Crosby (925) 680-4337 with any questions.

Regards,

Dan Duncan

Dan Duncan

APPENDIX B

Digester Gas Quality Results

Digester Gas Quality(UT82-0003h)

7/1/2024 - 12/31/2024

	Hydrogen Sulfide (H2S)	
Date	Iron Sponge	Gas Skid
7/1/24	30	29
7/15/24	3	4
7/22/24	24	23
7/29/24	16	14
8/5/24	28	1
8/12/24	1	
8/19/24	1	
8/26/24	2	
9/9/24	13	1
9/16/24	12	1
9/23/24	5	
10/1/24	5	2
10/7/24	7	5
10/14/24	6	4
10/21/24	7	5
10/24/24		1
10/28/24	6	4
11/4/24	6	4
11/11/24	12	11
11/18/24	16	12
12/2/24	11	10
12/16/24	12	11
12/23/24	9	7
12/30/24	13	10

AVG	10	8
MIN	1	1
MAX	30	29






Please Sign - Semi Annual Monitoring Report July - December 2024_Final

Final Audit Report

2025-01-30

Created:	2025-01-30
By:	Catherine Noceti (cnoceti@srcity.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA6I5j9hbRNDjIY9quyZ2g9YymTMAcCrKR

"Please Sign - Semi Annual Monitoring Report July - December 2024_Final" History

-  Document created by Catherine Noceti (cnoceti@srcity.org)
2025-01-30 - 10:11:15 PM GMT
-  Document emailed to Jennifer Burke (jburke@srcity.org) for signature
2025-01-30 - 10:12:01 PM GMT
-  Email viewed by Jennifer Burke (jburke@srcity.org)
2025-01-30 - 10:19:28 PM GMT
-  Document e-signed by Jennifer Burke (jburke@srcity.org)
Signature Date: 2025-01-30 - 10:26:58 PM GMT - Time Source: server
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2025-01-30 - 10:26:58 PM GMT