

# MARATHON BAY AREA COGEN

550 SOLANO WAY • MARTINEZ, CALIFORNIA 94553 • PHONE 925-370-3380 • FAX 925-313-0814

(SEND BY CERTIFIED MAIL)

December 14, 2023

Director of Compliance and Enforcement  
BAAQMD  
375 Beale Street, Suite 600  
San Francisco, CA 94105  
Attn: Title V Reports

TV Tracking #: 843

1.  RECEIVED IN ENFORCEMENT: 12/21/2023

RECEIVED  
2023 DEC 21 PM 3:42  
BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT

Subject: **Title V Semi-Annual Compliance Report**

Dear Sir or Madam:

This letter with attachments is submitted to serve as the Martinez Cogen Limited Partnership at Tesoro, Facility No. A1820, Title V Semi-Annual Compliance Report. All information in this report is true, accurate and complete based on information and beliefs formed after reasonable inquiry.

During the semester between June 1, 2023 and November 30, 2023 we:

- A. Had no exceedances.
- B. Submitted our monthly reports on time. All information in the reports is true, accurate and complete based on information and belief formed after reasonable inquiry.
- C. Performed weekly H<sub>2</sub>S walkdown reports and found no instances of leaking H<sub>2</sub>S.
- D. Performed the annual CO compliance certification test, which verifies that both gas turbine units were in compliance.

If you have any questions or comments, please call me at (925) 370-3363.

Very truly yours,



Brian Walker  
Maintenance Supervisor

cc: 6.00.86  
Att: Title V Semi-Annual Monitoring Verification Report

# Title V Semi-Annual Monitoring Verification Report

Date: Dec. 14, 2023

Period: 6/1/2023

To: 11/30/2023

Site #: A1820

Site Name: Martinez Cogen Ltd. Partnership

Address: 550 Solano Way

City: Martinez

State: CA

Zip Code: 94553

Source #: N/A				Source Name: COOLING TOWER					
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6-1-301 SIP 6-301	Y	< Ringelmann 1 for more than 3 min/hr			N		Y	
FP	BAAQMD Regulation 6-1-310 SIP 6-310	Y	0.15 grains per dscf			N		Y	

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Site #: A1820

Site Name: Martinez Cogen Ltd. Partnership

Address: 550 Solano Way

City: Martinez

State: CA

Zip Code: 94553

Source #: S-1, S-2		Source Name: S-1 Sludge Drying Operation & S-2 Product Silo							
Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301 SIP 6-301	Y		Ringelmann No. 1 for 3 minutes in any hour		N	N/A	OOS	
FP	BAAQMD 6-1-310 SIP 6-310	Y		0.15 grain/dscf		N	N/A	OOS	
FP	BAAQMD 6-1-311 SIP 6-311	Y		3.4 lb/hr (throughput = 0.71 tons/hr)		N	N/A	OOS	

Note: OOS - "Out of Service". Plant is completely down. No product, lines blinded, all vessels emptied.

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Date: Dec. 14, 2023

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To: 11/30/2023

Site #: A1820

Site Name: Martinez Cogen Ltd. Partnership

Address: 550 Solano Way

City: Martinez

State: CA

Zip Code: 94553

Source #: S-10, S-11				Source Name: Gas Turbines					
Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NOx	BAAQMD 9-9-301.1.2, 9-9-401 SIP 9-9-301.2	Y		17.1 ppmv dry @15% O <sub>2</sub> , 3-hr average excluding startup and shutdown periods (includes efficiency adjustment)	BAAQMD 9-9-501	C	CEM	Y	
	BAAQMD 9-9-301.2,	N		0.43 lbs/MWhr or 9 ppmv	BAAQMD 9-9-501, 9-9-605 and BAAQMD Condition 13422, part 13	C	CEM	Y	
	BAAQMD Condition 13422, part 2	Y		1,512 lbs/day and 198.5 tons/yr	BAAQMD Condition 13422, parts 5 and 7 through 10	C	CEM	Y	
	BAAQMD Condition 13422, part 3	Y		17.1 ppmv dry @15% O <sub>2</sub> , 3-hr average excluding startup period not to exceed 3 hrs and shutdown periods not to exceed 1 hr	BAAQMD Condition 13422, part 5	C	CEM	Y	

Source #: S-10, S-11

Source Name: Gas Turbines

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
				(includes efficiency adjustment)					
NOx	NSPS Subpart GG, 60.332 (a)(1)	Y		85.2 ppmv, @ 15% O2, dry, 3 hour average excluding startup and shutdown periods	Monitoring requirement subsumed by Regulation 9, Rule 9 monitoring. See Permit Shield.	N		Y	
NOx	PSD Permit Condition IX, C	Y		81.0 lbs/hr/turbine, 3 hour average except for 3 hours following commencement of turbine startup and 1-hour preceding completion of turbine shutdown	Monitoring requirement subsumed by Regulation 9, Rule 9 monitoring. See Permit Shield.	N		Y	
NOx	PSD Permit Condition IX,C	Y		45.0 ppm @15% O2, 3 hour average except for 3 hours following commencement of turbine startup and 1-hour preceding completion of turbine shutdown	Monitoring requirement subsumed by Regulation 9, Rule 9 monitoring. See Permit Shield.	N		Y	
SO2	BAAQMD Condition 13422, part 2	Y		550 lbs/day and 36 tons/yr	BAAQMD Condition 13422, part 5	C	CMS	Y	
	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min., or 0.25 ppm for 60 min., or 0.05 ppm for 24 hours		N		Y	
SO2	SIP 9-1-301	Y		Federal std: GLC <sup>1</sup> of 140 ppb, 24-hr average, once/yr and 30 ppb, annual		N		Y	

Source #: S-10, S-11

Source Name: Gas Turbines

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
				average State std: GLC <sup>1</sup> of 40 ppb, 24-hr average, and 250 ppb, 1 hr average					
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)		N		Y	
SO2	NSPS Subpart GG, 60.333(b)	Y		Sulfur content of fuel < 0.8% by weight	Subsumed by BAAQMD Cond #13422, parts 4 and 5	N		Y	
	BAAQMD Condition 13422, part 4	Y		≤ 62 ppm H2S in refinery gas, annual average, (not emission limit)	BAAQMD Condition 13422, part 4 and part 5	C	CMS	Y	
CO	BAAQMD Condition 13422, part 2	Y		1,248 lbs/day and 228 tons/yr		P/A	annual source test	Y	
NMHC	BAAQMD Condition 13422, part 2	Y		210 lbs/day and 35 tons/yr		N		Y	
PM10	BAAQMD Condition 13422, part 2	Y		240 lbs/day and 43.8 tons/yr		N		Y	
Opacity	BAAQMD 6-1-301 SIP 6-301	N		Ringelmann No. 1		N		Y	
FP	BAAQMD 6-1-310 SIP 6-310	Y		0.15 grain/dscf @ 6% O <sub>2</sub>		N		Y	
H <sub>2</sub> S	BAAQMD 9-2-301	N		GLC <sup>1</sup> of 0.06 ppm 3 min. average, or 0.03 ppm 60 min. average	BAAQMD Condition 13422, part 12	P/W	weekly inspection	Y	
Fuel Usage	BAAQMD Condition 13422,	Y		500 MMBtu/hr per turbine	BAAQMD Condition 13422, part 5	C	records	Y	

Source #: S-10, S-11

Source Name: Gas Turbines

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
	part 1								
Fuel Usage	PSD Permit Condition VII, F.	Y		500 MMBtu/hr per turbine	PSD Permit Condition VII, F.	C	records	Y	

Note 1: Ground Level Concentration

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Date: Dec. 14, 2023

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Site #: A1820

Site Name: Martinez Cogen Ltd. Partnership

Address: 550 Solano Way

City: Martinez

State: CA

Zip Code: 94553

Source #: S-12, S-13		Source Name: DIESEL IC ENGINES FOR GAS TURBINE START							
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6-1-303 SIP 6-303	Y		Ringelmann 2.0 for 3 minutes in any hour		N		Y	
FP	BAAQMD Regulation 6-1-310 SIP 6-310	Y		0.15 grain/dscf		N		Y	
SO2	BAAQMD Regulation 9-1-301	N		ground level concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours	Condition #18843, part 2	P/E	Vendor fuel certification	Y	
SO2	BAAQMD Regulation 9-1-304	Y		0.5% sulfur limit for liquid fuel	Condition #18843, part 2	P/E	Vendor fuel certification	Y	
SO2	CCR 93115.5(a),C	N		Sulfur content of fuel: CARB Diesel	Condition #18843, part 2	P/E	Vendor fuel certification	Y	

Source #: S-12, S-13

Source Name: DIESEL IC ENGINES FOR GAS TURBINE START

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
	Condition #18843, part 2			(or equivalent)					
Hours of operation	CCR 93115.3(j), Condition #18843, part 1	Y		Low-use prime engine exemption. BAAQMD limit: 190 hours per year, each engine	Condition #18843, part 3	P/E	Recordkeeping	Y	

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Site #: A1820

Site Name: Martinez Cogen Ltd. Partnership

Address: 550 Solano Way

City: Martinez

State: CA

Zip Code: 94553

Source #: S-14		Source Name: DIESEL IC ENGINE FOR EMERGENCY POWER GENERATION							
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6-1-303 SIP 6-303	Y		Ringelmann 2.0 for 3 minutes in any hour		N		Y	
FP	BAAQMD Regulation 6-1-310 SIP 6-310	Y		0.15 grain/dscf		N		Y	
SO2	BAAQMD Regulation 9-1-301 BAAQMD	N		ground level concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours	Condition #18844, part 1	P/E	Vendor fuel certification	Y	
SO2	BAAQMD Regulation 9-1-304	Y		0.5% sulfur limit for liquid fuel	Condition #18844, part 1	P/E	Vendor fuel certification	Y	
SO2	Condition #18844, part	N		CARB Diesel (or equivalent)	Condition #18844, part 1	P/E	Vendor fuel certification	Y	

Source #: S-14

Source Name: DIESEL IC ENGINE FOR EMERGENCY POWER GENERATION

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Emission Limits	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
	1								
Hours of operation	Condition #18844, part 2	Y		reliability-related activities not to exceed 20 hours in any consecutive 12-month period	Condition #18844, part 6	P/E	Recordkeeping	Y	