



PUBLIC WORKS

CITY OF
**PALO
ALTO** 2501 Embarcadero Way
Palo Alto, CA 94303
650.329.2598

September 13, 2019

Attn: Brenda Cabral
Bay Area Air Quality Management District (BAAQMD)
Engineering Division
375 Beale Street, Suite 600
San Francisco, CA 94105

Facility: BAAQMD Site ID No. 617
City of Palo Alto Regional Water Quality Control Plant (RWQCP)
2501 Embarcadero Way, Palo Alto, CA 94303

Reference: Sewage Sludge Incinerator Decommissioning

Re: Title V Permit Application Withdrawal & PTO Source Removal

Dear Ms. Cabral,

The City of Palo Alto Regional Water Quality Control Plant (RWQCP) is requesting withdrawal of the Title V Major Facility Review Application submitted to BAAQMD on March 5, 2014. The application was submitted in compliance with the then newly promulgated Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Sewage Sludge Incineration Units and the subsequent Federal Plan Requirements for Sewage Sludge Incineration Units Constructed on or Before October 14, 2010, also referred to as CAA §129 (40 CFR 60.5245; 62.16035). As of September 13, 2019 the RWQCP sewage sludge incinerators (S-1 & S-2) as well as associated abatement devices (A20 – A23) have been permanently removed from operation by capping all the auxiliary fuel lines (natural gas and landfill gas). The sewage sludge (biosolids) itself does not have enough heat content to be burned without an auxiliary fuel source. Therefore, after capping the fuel lines, the RWQCP has officially decommissioned, or removed from operation, the aforementioned sources and abatement devices..

The enclosed Device Data Update (Form DDU) officially requests removal of the incinerators and associated abatement devices. As such, the RWQCP is no longer subject to CAA §129 Title V permitting requirements (40 CFR 62.15855). The RWQCP does not contain a major source and does not have high enough emissions to qualify as a major facility per BAAQMD Regulation 2-6-212, refer to Table 1 below as well as the enclosed potential to emit calculations submitted with the RWQCP's Major Facility Review Application.



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Table 1: Title V Thresholds BAAQMD Regulation 2-6-212 and RWQCP Potential to Emit

Description	Title V Threshold (TPY)	RWQCP Potential To Emit ^a (TPY)
Maximum Emissions for Any Single Hazardous Air Pollutant (HAP)	10	0.036 (HCl)
Combined HAPs	25	0.16
Maximum Emissions for Any Single Regulated Air Pollutant	100	22 (NO _x)

a. RWQCP Title V Major Facility Review Application, March 5, 2014, includes potential emissions from incinerators

Consequently, the RWQCP is seeking to withdrawal the Title V Major Facility Review Application and remove the incinerators and associated abatement devices from the RWQCP Permit-to-Operate. If you have any questions, please contact me at 650-329-2243 or Samantha Engelage at 650-329-2123 or by e-mail at Samantha.Engelage@CityofPaloAlto.org.

Sincerely,



James S. Allen
Regional Water Quality Control Plant Manager

Enclosures:

- Encl. 1 – Device Data Update Form
- Encl. 2 – Title V Potential to Emit Calculations as Submitted with the RWQCP’s Major Facility Review Application

- ecc: Robert Delarno, Bay Area Air Quality Management District
Mark Sims, USEPA Region IX
Phil Bobel, Assistant Director of Public Works, City of Palo Alto
Karin North, Watershed Protection Manager, City of Palo Alto
Samantha Engelage, Senior Engineer, City of Palo Alto
Diego Martinez Garcia, Associate Engineer, City of Palo Alto



Device Data Update Form

When Do I Use This Form? Use this form to do any of the actions listed in the table below (check all actions that apply).

<input checked="" type="checkbox"/>	You can...	Important Notes
<input type="checkbox"/>	Permanently remove materials from a source	You can only remove materials that you have not used in the last 12 months and do not anticipate to use in the future.
<input checked="" type="checkbox"/>	Permanently remove entire sources	<ul style="list-style-type: none"> You can only remove sources that are either dismantled or permanently removed from your operations. Your Permit(s) to Operate the removed sources will be cancelled. If you remove a source, you will need to obtain an Authority to Construct and/or Permit to Operate before you re-construct or operate the removed source.
<input checked="" type="checkbox"/>	Permanently remove entire abatement devices	<ul style="list-style-type: none"> You can only remove abatement devices that are either dismantled or permanently removed from your operations. Prior to removing an abatement device that controls emissions from a source that is still in operation, you must contact your plant engineer at the District. Your request will require an application to modify the source or operating conditions.

How Do I Complete This Form?

1) Provide the following information:

Action	Required Information
Provide current District ID number for the facility (plant #, or site # as it appears on the Permit to Operate or invoice).	Plant# / Site #: <u>617</u>
Provide current business name (as it appears on the Permit to Operate or invoice).	Current Business Name: <u>Palo Alto Regional Water Quality Control Plant</u>
Provide physical address of your facility or permitted equipment.	Street # & Name: <u>2501 Embarcadero Way</u> City: <u>Palo Alto</u> State: <u>Ca</u> Zip: <u>94303</u> Phone: <u>(650) 329 - 2243</u>
Provide your name, title and the date when you complete this form.	First and Last Name: <u>James S. Allen</u> Title: <u>Plant Manager</u> Date: <u>9/13/2019</u>

2) Find sections below that are applicable to you and follow the instructions within these sections.

3) Mail this form to: BAAQMD, 375 Beale St., Ste. 600, San Francisco, CA 94105, ATTN: Permit Systems Section.

Removing Materials from Source

If you need to permanently remove materials (not used in the last 12 months) from a source at your facility, perform the action in the table below.

Action	Required Information
For each material to be removed, provide the source number and material name or/and District material code.	Source #: _____ Material Name or/and District Material Code: _____

<i>Note: If you have more materials to remove, attach to this form a list of additional materials to be removed in the same table format as above.</i>	



Removing Sources

If you need to permanently remove sources, perform the action in the table below.

Action	Required Information		
For each source to be removed, provide the source number, source name and removal date.	Source #:	Source Name:	Date Removed from Service:
	1	Sludge Incinerator #1	September 12, 2019
	2	Sludge Incinerator #2	September 12, 2019
<i>Note: If you have more sources to remove, attach to this form a list of additional sources to be removed in the same table format as above.</i>			

Removing Abatement Devices

If you need to permanently remove abatement devices, perform the action in the table below.

Note: If you remove an abatement device that controls emissions from a source that is still in operation, you must contact your plant engineer at the District.

Action	Required Information		
For each abatement device to be removed, provide the abatement device number, abatement device name and the removal date.	Abatement Device #:	Abatement Device Name:	Date Removed from Service:
	A20	Sludge Incinerator Afterburner #1	September 12, 2019
	A21	Sludge Incinerator Afterburner #2	September 12, 2019
	A22	Venturi Scrubber	September 12, 2019
	A23	Venturi Scrubber	September 12, 2019
<i>Note: If you have more abatement devices to remove, attach to this form a list of additional abatement devices to be removed in the same table format as above.</i>			

For Internal Use Only

Codes for Data Changes:

1. Change source name 2. Correct data 3. Source not operating 4. Other

Source #	Code	Comments

Inspector's Name: _____ #: _____ Date: _____

Approved by (Plant Engineer Name): _____ Date: _____

**City of Palo Alto
Regional Water Quality Control Plant**

Emissions Analysis

Total Facility Emissions - 2013

Pollutant	S-1	S-2	S-6	S-100	S-4614	S-4638	S-3639	S-4640	S-4641	S-4642	S-4643	Total
PM10	0.30	0.79	0.01		0.003	0.003	0.002	0.002	0.001	0.001	0.001	1.12
NOx	7.73	13.81			0.149	0.149	0.127	0.103	0.026	0.020	0.018	22.13
CO	5.73	10.08			0.022	0.022	0.019	0.019	0.020	0.020	0.018	15.95
POC	0.20	0.26		4.36	0.003	0.003	0.002	0.002	0.010	0.002	0.002	4.85
SO2	0.73	1.11			2.648E-05	2.648E-05	2.258E-05	1.851E-05	1.733E-05	1.509E-05	1.4E-05	1.84
HAP	1.99E-02	1.44E-01										1.64E-01
Dioxin	6.90E-11	3.50E-11										1.04E-10
Furans	1.41E-10	9.30E-11										2.34E-10
Hydrogen Chloride	1.58E-02	2.04E-02										3.62E-02
Formaldehyde	1.11E-03	8.43E-04										1.95E-03
Arsenic	8.17E-05	1.74E-04										2.56E-04
Beryllium	4.84E-07	1.15E-06										1.64E-06
Cadmium	3.12E-04	7.35E-04										1.05E-03
Chromium	2.19E-04	2.79E-05										2.47E-04
Lead	1.10E-03	2.06E-03										3.16E-03
Manganese	5.25E-05	2.02E-04										2.55E-04
Mercury	1.04E-03	1.73E-03										2.77E-03
Nickel	2.19E-04	3.89E-05										2.58E-04
Selenium	8.46E-06	1.56E-04										1.65E-04
Zinc	2.51E-02	2.30E-02										4.81E-02
DPM					2.80E-03	2.80E-03	2.39E-03	2.40E-03	1.13E-03	5.63E-04	5.25E-04	1.26E-02