

Title V Semi- Annual Monitoring Verification Report

Eco Services Operations LLC

100 Mococo Road, Martinez, CA 94553

Site #: B1661

Period: 01/01/2015 to 06/30/2015

Table VII-A
S-1 Sulfuric Acid Plant

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
SO2	BAAQMD 9-1-301	Y		Ground level concentrations of SO2 shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours		N	None	Y
SO2	BAAQMD 9-1-309	Y		Gaseous emissions from any source at an H2SO4 plant shall not exceed 300 ppm SO2 @ 12% oxygen	BAAQMD 9-1-502	C	CEM	Y
SO2	Consent Decree Paragraphs 7.p, 7.x, 11b	Y		2.2 lbs per ton averaged over 365-day period and 3.0 lbs per ton averaged over 3-hour period	Consent Decree paragraph 13	C	CEM	Y
H2SO4	BAAQMD 12-6-301	N		Gaseous emissions from an H2SO4 production unit shall not exceed 0.15 g/kg (0.3 lb/ton) of acid produced	BAAQMD Regulation 12-6-501	P/D	Daily Production Records	Y
H2SO4	BAAQMD 12-6-301	N		Gaseous emissions from an H2SO4 production unit shall not exceed 0.15 g/kg (0.3 lb/ton) of acid produced	BAAQMD Condition #17734, parts 17 and 24	P/D	pH monitoring	Y
H2SO4	BAAQMD 12-6-301	N		Gaseous emissions from an H2SO4 production unit shall not exceed 0.15 g/kg (0.3 lb/ton) of acid produced	BAAQMD Condition #17734, part 22	P/A	Method 8 of Appendix A to 40 CFR 60 and Daily Production Records	Y
H2SO4	40 CFR 60.31d	Y		0.25 grams sulfuric acid mist per kilogram of sulfuric acid produced, the production being expressed as 100% sulfuric acid	BAAQMD Condition #17734, part 22	P/Annual	Source Test	Y
H2SO4	40 CFR 60.83(a)(1)	Y		0.15 lbs per ton of 100% sulfuric acid produced	BAAQMD Condition #17734, part 23	P/Annual	Method 8 of Appendix A to 40 CFR 60 or such method that is approved by EPA	Y
Opacity	40 CFR 60.83(a)(2)	Y		Less than 10% opacity	40 CFR 60.11	P/E	Method 9 of Appendix A to 40 CFR 60	Y
SO3 and H2SO4 Emission Limit	BAAQMD 6-1-320	N		0.04 grain/dscf	BAAQMD Condition #17734, part 22	P/Annual	Source Test	Y
SO3 and H2SO4 Emission Limit	BAAQMD 6-1-320	N		0.04 grain/dscf	BAAQMD Condition #17734, parts 17 and 24	P/D	pH monitoring	Y
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	BAAQMD Condition #17734, parts 17 and 24	P/D	pH monitoring	Y
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	BAAQMD Condition #17734, parts 17 and 22	P/D	Source Test	Y
FP	BAAQMD 6-1-310	N		0.15 grain/dscf	BAAQMD Condition #17734, parts 17 and 24	P/D	pH monitoring	Y

FP	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	BAAQMD Condition #17734, part 22	P/Annual	Source Test/Monthly records	Y
FP	BAAQMD 6-1-311	N		4.10P ^{0.67} lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	BAAQMD Condition #17734, parts 17 and 24	P/D	pH monitoring	Y
Through-put	BAAQMD Condition #17734, Part 4	Y		1834 tons sulfuric acid per day	BAAQMD Condition #17734, Part 15	P/M	records	Y
Through-put	BAAQMD Condition #17734, Part 9	Y		629,062 tons sulfuric acid per year	BAAQMD Condition #17734, Part 15	P/M	records	Y
Scrubber Liquid pH	BAAQMD Condition #17734, Part 17b	Y		pH between 3.5 and 14	BAAQMD Condition #17734, Part 33	P/D	Scrubber liquid sampling and pH testing	Y

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Table VII-B
S-2 Auxiliary Boiler

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
NOx	BAAQMD 9-7-301.1	N		Emissions shall not exceed 30 ppmv @ 3% O2	BAAQMD Condition #17734, part 22	P/Every 5 years	Source Test	Y
NOx	SIP 9-7-301.1	Y		Emissions shall not exceed 30 ppmv @ 3% O3		N		Y
CO	BAAQMD 9-7-301.4	N		Emissions shall not exceed 400 ppmv, dry @ 3% O2	BAAQMD Condition #17734, part 22	P/Every 5 years	Source Test	Y
CO	SIP 9-7-301.2	Y		Emissions shall not exceed 400 ppmv @ 3% O2		N		Y
SO2	BAAQMD 9-1-301	Y		Ground level concentrations shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours		N		Y
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)		N		Y
Opacity	BAAQMD 6-1-301	Y		Ringelmann No. 1 for < 3 min/hr		N		Y
FP	BAAQMD 6-1-310.3	Y		0.15 grain/dscf @ 6% O2		N		Y
Fuel Usage	BAAQMD Condition #17734, Part 2	Y		978,200,000 standard cubic feet per year at S-2 and S-3	BAAQMD #17734, Part 14	P/M	Fuel Meter	Y
Fuel Usage	BAAQMD Condition #17734, Part 3	Y		2,700,000 standard cubic feet per day at S-2 and S-3	BAAQMD #17734, Part 14	P/M	Fuel Meter	Y

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Table VII-C
S-3 Natural Gas Preheater Furnace

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr		N		Y
FP	BAAQMD 6-1-310	N		0.15 grains/dscf		N		Y
SO2	BAAQMD 9-1-301	Y		Ground level concentrations shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours		N		Y
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)		N		Y
Fuel Usage	BAAQMD Condition #17734, Part 2			978,200,000 standard cubic feet per year at S-2 and S-3		N		Y
Fuel Usage	BAAQMD Condition #17734, Part 3			2,700,000 standard cubic feet per day at S-2 and S-3		N		Y

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Table VII-D
S-16 Sulfur Storage Tank, T-2
S-17 Sulfur Storage Tank, T-14
S-18 Sulfur Storage Tank, T-12
S-50 Sulfur Storage Tank, T-16

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
Through-put Limits	BAAQMD Condition #17734, Part 5	Y		888 long tons of sulfur per day at S-16, S-17, S-18, and S-50	BAAQMD Condition #17734, part 15	P/M	monthly records	Y
Through-put Limits	BAAQMD Condition #17734, Part 10	Y		324,000 long tons of sulfur per year at S-16, S-17, S-18, and S-50	BAAQMD Condition #17734, part 15	P/M	monthly records	Y

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**Table VII-E
S-19, Alky Tank**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
Through-put Limits	BAAQMD Condition #17734, Part 6	Y		960 tons of alkylation acid per day	BAAQMD Condition #17734, Part 15	P/M	monthly records	Y
Through-put Limits	BAAQMD Condition #17734, Part 11	Y		267,351 tons of alkylation acid per year	BAAQMD Condition #17734, Part 15	P/M	monthly records	Y

**Table VII-F
S-20, Alky Tank**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
Through-put Limits	BAAQMD Condition #17734, Part 7	Y		960 tons of alkylation acid per day	BAAQMD Condition #17734, part 15	P/M	monthly records	Y
Through-put Limits	BAAQMD Condition #17734, Part 12	Y		267,351 tons of alkylation acid per year	BAAQMD Condition #17734, part 15	P/M	monthly records	Y

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Table VII-G
S-30 Gasoline Dispensing Facility

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
VOC	None	N		None	BAAQMD Regulation 8-7-503	P/A	Records	Y
Through-put Limit	BAAQMD Condition #7523, Part I	Y		400,000 gallons in any year	BAAQMD Condition #17817, Part I	Y	Monthly Records	Y

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Table VII-H
S-51 Oleum Storage Tank, T-19

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
Oleum	BAAQMD 12-10-401	N		0.01 grams per cubic meter at fence line or 2 ppm as H2SO4 over any 10 consecutive minutes		N		N/A Not Operated
Through-put Limits	BAAQMD Condition #13337, part 1	Y		73,000 tons of oleum sulfuric acid material per year	BAAQMD Condition #13337, part 11	P/M	Monthly records	N/A Not Operated
Through-put Limits	BAAQMD Condition #13337, part 13	Y		300 tons of oleum sulfuric acid material per day	BAAQMD Condition #13337, part 11	P/M	Monthly records	N/A Not Operated
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for no more than 3 minutes in any hour	BAAQMD Condition #13337, part 18	P/Q	visible emissions check	N/A Not Operated
Opacity	BAAQMD Condition #13337, part 3			Ringelmann 0.5 or result in fallout to cause a public nuisance	BAAQMD Condition #13337, part 18	P/Q	visible emissions check	N/A Not Operated
SO2	BAAQMD 9-1-301	Y		Ground level concentrations of SO2 shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours		N		N/A Not Operated
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)	BAAQMD Condition 13337, Part 16	P/Annual	Source Test	N/A Not Operated
SO2	BAAQMD Condition #13337, Part 7A	Y		0.416 lb/hr SO2 in any hour nor 0.416 lb SO2 per 60 min avg.	BAAQMD Condition 13337, Part 16	P/Annual	Source Test and Monthly records	N/A Not Operated
SO3	BAAQMD Condition #13337, Part 7B	Y		0.5 lb/hr SO3 in any hour nor 0.5 lb SO3 per 60 min avg.	BAAQMD Condition 13337, Part 16	P/Annual	Source Test and Monthly records	N/A Not Operated
H2SO4	BAAQMD Condition #13337, Part 7C	Y		0.558 lb/hr sulfuric acid in any hour nor 0.558 lb sulfuric acid per 60 min avg.	BAAQMD Condition 13337, Part 16	P/Annual	Source Test and Monthly records	N/A Not Operated

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**Table VII-1
S-52 Oleum Truck Loading**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
Oleum	BAAQMD 12-10-401	N		0.01 grams per cubic meter at fence line or 2 ppm as H2SO4 over any 10 consecutive minutes		N		N/A Not Operated
Through-put Limits	BAAQMD Condition #13337, part 2	Y		73,000 tons of oleum sulfuric acid material per year	BAAQMD Condition #13337, part 12	P/M	Monthly records	N/A Not Operated
Through-put Limits	BAAQMD Condition #13337, part 14	Y		300 tons of oleum sulfuric acid material per days	BAAQMD Condition #13337, part 12	P/M	Monthly records	N/A Not Operated
Opacity	BAAQMD 6-1-301	N		Ringelmann No. 1 for < 3 min/hr	BAAQMD Condition #13337, part 18	P/Q	visible emissions check	N/A Not Operated
Opacity	BAAQMD Condition #13337, part 3			Ringelmann 0.5 or result in fallout to cause a public nuisance	BAAQMD Condition #13337, part 18	P/Q	visible emissions check	N/A Not Operated
SO2	BAAQMD 9-1-301	Y		Ground level concentrations of SO2 shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours		N		N/A Not Operated
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)	BAAQMD Condition 13337, Part 16	P/Annual	Source Test	N/A Not Operated
SO2	BAAQMD Condition #13337, Part 8A	Y		4.0 lb/hr SO2 nor 2 lbs SO2 per 30 min avg.	BAAQMD Condition 13337, Part 16	P/Annual	Source Test and Monthly records	N/A Not Operated
SO3	BAAQMD Condition #13337, Part 8B	Y		0.5 lb/hr SO3 nor 0.5 lbs SO3 per 60 min avg.	BAAQMD Condition 13337, Part 16	P/Annual	Source Test and Monthly records	N/A Not Operated
H2SO4	BAAQMD Condition #13337, Part 8C	Y		0.746 lb/hr sulfuric acid nor 0.746 lb sulfuric acid per 60 min avg.	BAAQMD Condition 13337, Part 16	P/Annual	Source Test and Monthly records	N/A Not Operated

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Table VII-J
S-54 Lube Spent Acid Storage Tank, T-360

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
Through-put Limits	BAAQMD Condition #17906, part 1	Y		100,000 tons of lube spent acid per year	BAAQMD Condition #17906, part 8	P/M	Monthly records	N/A Not Operated
Through-put Limits	BAAQMD Condition #17906, part 3	Y		400,000 tons of spent alky sulfuric acid per year	BAAQMD Condition #17906, part 8	P/M	Monthly records	N/A Not Operated
Through-put Limits	BAAQMD Condition #17906, part 13	Y		504 tons of lube spent acid per calendar day	BAAQMD Condition #17906, part 8	P/M	Monthly records	N/A Not Operated

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**Table VII-L
S-56 Standby Diesel Fire Pump Engine**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
Opacity	BAAQMD 6-1-303.1	N		Ringelmann No. 2 for no more than 3 minutes in any hour		N		Y
Opacity	SIP Regulation 6-303.1	Y		Ringelmann No. 2 for 3 minutes in any hour		N		Y
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		Y
FP	SIP Regulation 6-310	Y		0.15 grain/dscf		N		Y
SO2	BAAQMD 9-1-301	Y		Property Line Ground Level Limits: ≤0.5 ppm for 3 minutes and ≤0.25 ppm for 60 minutes and ≤0.05 ppm for 24 hours	None	N		Y
SO2	BAAQMD 9-1-304	Y		Fuel Sulfur Limit 0.5%	None	P/E	Vendor Certification	Y
Reliability Related Hours	BAAQMD 9-8-330	N	1/1/2012	100 hours until 1/1/12 50 hours after 1/1/12	9-8-502	P/E	Totalizing meter record keeping	Y
Reliability Related Hours	BAAQMD Condition #22850, Part 1	N		50 hours per calendar year	BAAQMD Condition #22850, Part 3, 4	P/E	Totalizing meter record keeping	Y

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**Table VII-M
S-57 Sulfuric Acid Cleaning Operation**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Y/N
VOC	BAAQMD 8-5-331.1	Y		Tank Cleaning Agent limit: Initial boiling point >302 degree F, true vapor pressure <0.5 psia, or VOC content <50 g/l	BAAQMD Condition #24537, Part 9	P/E	Record keeping	N/A Not Operated
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)		N		N/A Not Operated
Hours	BAAQMD Condition #24537, Part 1	Y		1,320 hours per consecutive 12-month period	BAAQMD Condition #24537, Part 9	P/E	Record keeping	N/A Not Operated
Scrubbing solution flow rate	BAAQMD Condition #24537, Part 4	Y		≥ 80 gallons per minute to Venturi scrubber when in operation	BAAQMD Condition #24537, Part 9	P/E	Record keeping	N/A Not Operated
Scrubbing solution flow rate	BAAQMD Condition #24537, Part 6	Y		≥120 gallons per minute to packed column scrubber when in operation	BAAQMD Condition #24537, Part 9	P/E	Record keeping	N/A Not Operated
pH	BAAQMD Condition #24537, Part 8	Y		pH of scrubber solution ≥ 8	BAAQMD Condition #24537, Part 9	P/E	Record keeping	N/A Not Operated