AMERESCO
Green • Clean • Sustainable

111 Speen St, Ste 410
Framingham, MA 01701
P: (508) 661-2200
ameresco.com

July 15, 2025

TV Tracking #1152 (Semi-Annual)

1. ☐ RECEIVED IN ENFORCEMENT: 07/17/2025

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

RE: Semiannual Monitoring and Deviation Report: 1/1/2025 – 6/30/2025
Ameresco Half Moon Bay LLC, Plant #B7040
Title V Permit - Condition I.F (Regulation 2-6-502)

Dear Director,

Ameresco Half Moon Bay LLC is submitting this Semiannual Monitoring and Deviation Report in accordance with Condition I.F (Regulation 2-6-502) of Title V Permit #B7040 issued on December 14, 2020. As required, this report covers the compliance period of January 1, 2025 through June 30, 2025.

This report is certified by the facility Responsible Official (RO). If you have any questions on this submittal or require additional information, please contact me or Rebecca Sherwood at rsherwood@ameresco.com or (508) 598-3049.

Sincerely,
Ameresco Half Moon Bay LLC;

Harold Stewart

Harold Stewart,
Authorized Representative

Attachments:
1. Certification Statement
2. Semiannual Compliance Report
3. Summary of Deviations

CC: R. Peary, R. Sherwood, P. Ziesing, J. Lankford, R. DeVries, Ameresco
R. Guittap, D. Oliver, T. Endow, compliance@baaqmd.gov, BAAQMD

ATTACHMENT 1:

CERTIFICATION STATEMENT

AMERESCO HALF MOON BAY LLC
SEMIANNUAL MONITORING AND DEVIATION REPORT

JANUARY – JUNE 2025

Permit Services Division
Bay Area Air Quality Management District
375 Beale Street, Suite 600, San Francisco, CA 94105 • 415-749-4990

Major Facility Review
Certification Statement

FACILITY NAME Ameresco Half Moon Bay LLC FACILITY # 17040

STATEMENT OF COMPLIANCE:

I certify the following:

Read each statement carefully and initial each box for confirmation.

HS ***Based on information and belief formed after reasonable inquiry, the source(s) identified in the Applicable Requirements and Compliance Summary form that is(are) in compliance will continue to comply with the applicable requirement(s);***

HS ***Based on information and belief formed after reasonable inquiry, the source(s) identified in the Applicable Requirements and Compliance Summary form will comply with future-effective applicable requirement(s), on a timely basis;***

HS ***Based on information and belief formed after reasonable inquiry, information on application forms, all accompanying reports, and other required certifications is true, accurate, and complete;***

HS ***All fees required by Regulation 3, including Schedule P have been paid.***

STATEMENT OF NON-COMPLIANCE

Read statement carefully. Initial box for confirmation if statement is true.

I certify the following:

☐ ***Based on information and belief formed after reasonable inquiry, the source(s) identified in the Schedule of Compliance application form that is(are) not in compliance with the applicable requirement(s) will comply in accordance with the attached compliance plan schedule.***

Harold Stewart
Signature of Responsible Official

07/16/2025
Date

Harold Stewart
Name of Responsible Official

ATTACHMENT 2:

SEMIANNUAL COMPLIANCE REPORT

AMERESCO HALF MOON BAY LLC
SEMIANNUAL MONITORING AND DEVIATION REPORT

JANUARY – JUNE 2025

Ameresco Half Moon Bay LLC
Plant Number: 17040

12310 San Mateo Road
Half Moon Bay, CA 94019

Reporting Period: January 1, 2025 to June 30, 2025
Source Name: Internal Combustion Lean Burn Engines and TSA System with Control Flare
Sources #: S-1; S-2; S-3; S-4; S-5; S-6; S-7; S-8, A-8

Semiannual Monitoring and Deviation Report

Applicable Requirement	Description	Compliance Determination Method	Compliance (Y/N)	Continuous or Intermittent	Comments
BAAQMD Regulation 1	**General Provisions and Definitions**				
1-523	**Parametric Monitoring and Recordkeeping Procedures**				
523.1	Report periods of inoperation > 24 hours by next workday	Reporting	Y	C	
523.2	Limit on duration of inoperation	Monitoring	Y	C	
523.3	Report monitored violations of any applicable limits within 96 hours	Reporting	Y	C	
523.4	Record inoperation, tests, calibrations, adjustments, & maintenance	Recordkeeping	Y	C	
523.5	Maintain and calibrate monitors	Monitoring	Y	C	
BAAQMD Regulation 2 Rule 1	**General Requirements**				
2-1-405	Posting of Permit to Operate	Monitoring	Y	C	
2-1-429	Federal Emissions Statement	Reporting	Y	C	
BAAQMD Regulation 3	**Fees**				
3-319	Major Stationary Source Fees (Schedule M)	Monitoring	Y	C	
3-320	Toxic Inventory Fee (Schedule N)	Monitoring	Y	C	
3-327	Permit to Operate, Renewal Fees (Schedule B)	Monitoring	Y	C	

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Semiannual Monitoring and Deviation Report

Applicable Requirement	Description	Compliance Determination Method	Compliance (Y/N)	Continuous or Intermittent	Comments
3-333	Major Facility Review (MFR) Fees (Schedule P)	Monitoring	Y	C	
3-334	Greenhouse Gas Fees (Schedule T)	Monitoring	Y	C	
BAAQMD Regulation 6	**Particulate Matter and Visible Emissions**				
6-1-301	Ringelmann No.1 Limitation	Monitoring	Y	C	
6-1-302	Opacity Limitation	Monitoring	Y	C	
6-1-305	Visible Particles	Monitoring	Y	C	
6-1-310	Particle Weight Limitation (343 mg/dscm or 0.15 grains/dscf)	Monitoring	Y	C	
6-1-401	Appearance of Emissions	Monitoring	Y	C	
6-1-501	Sampling Facilities and Instruments Required	Monitoring	Y	C	
6-1-502	Data, Records, and Reporting	Monitoring/Records	Y	C	
6-1-504	Demonstration of Total Suspended Particles (TSP) Compliance	Testing	Y	C	
BAAQMD Regulation 8	**LFG Collection and Control System**				
8-34-301	**Landfill Gas Collection and Emission Control System**				
301.2	Control Systems Leak Limit < 1000 as CH4; repair leaks within 7 days	Monitoring	Y	C	
301.3	Flare NMOC Limit < 30 ppmv as CH4 at 3% O2 or 98% destruction	Monitoring	Y	C	

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Semiannual Monitoring and Deviation Report

Applicable Requirement	Description	Compliance Determination Method	Compliance (Y/N)	Continuous or Intermittent	Comments
301.4	Engines NMOC Limit < 120 ppmvd as CH4 at 3% O2 or 98% destruction or 97% destruction of organic compounds and CH4	Monitoring	Y	C	
8-34-412	Compliance Demonstration Tests	Monitoring	Y	C	
8-34-413	Performance Test Report	Reporting	Y	C	
8-34-501	**Operating Records**				
501.2	Emission Control System Downtime	Recordkeeping	Y	C	
501.3	Continuous Temperature	Recordkeeping	Y	C	
501.4	Testing Records	Recordkeeping	Y	C	
501.6	Leak Discovery and Repair Records	Recordkeeping	Y	C	
501.10	Continuous Gas Flow Records	Recordkeeping	Y	C	
501.11	Records of Key Emission Control System Operating Parameters	Recordkeeping	Y	C	
501.12	Maintain records 5 years	Recordkeeping	Y	C	
8-34-503	Landfill Gas Collection and Emission Control System Leak Testing	Monitoring	Y	C	
8-34-504	Portable Hydrocarbon Detector	Monitoring	Y	C	
8-34-507	Continuously operate temperature recording device (flare)	Monitoring	Y	C	
8-34-508	Gas flow meter records flow rate at least every 15 minutes	Monitoring/Records	Y	I	See: “Summary of Deviations”.
8-34-509	Key emission control system operating parameters	Monitoring/Records	Y	C	

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Semiannual Monitoring and Deviation Report

Applicable Requirement	Description	Compliance Determination Method	Compliance (Y/N)	Continuous or Intermittent	Comments
BAAQMD Regulation 9, Rule 1	**Inorganic Gaseous Pollutants – Sulfur Dioxide**				
9-1-301	Ground Level SO_2 Concentration Limit	N/A	N/A	N/A	
9-1-302	General Emission Limitations	Monitoring	Y	C	
BAAQMD Regulation 9 Rule 2	**Inorganic Gaseous Pollutants – Hydrogen Sulfide**				
9-2-301	Ground Level H_2S Concentration Limit	N/A	N/A	N/A	
BAAQMD Regulation 9 Rule 8	**Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines**				
9-8-302	**Emission Limits – Waste Derived Fuel Gas**				
302.1	Lean-Burn Engines: NOx Emission Limit	Monitoring	Y	C	
302.3	CO Emission Limit	Monitoring	Y	C	
9-8-501	Initial Demonstration of Compliance	Monitoring	Y	C	
9-8-502.3	Compliance Demonstration Test Records	Recordkeeping	Y	C	
9-8-503	Quarterly Demonstration of Compliance (ECOM)	Monitoring	Y	C	

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Semiannual Monitoring and Deviation Report

Permits to Operate

Applicable Requirement	Description	Compliance Determination Method	Compliance (Y/N)	Continuous or Intermittent	Comments
BAAQMD Permits to Operate	**Cond #25465**				
Part 1	Fuel Restrictions and Bypass Event Limitations	Monitoring/Records	Y	C	
Part 2	Heat Input Limits and Monitoring Requirements	Monitoring/Records	Y	C	
Part 3	CO Emissions < 1.8 g/bhp-hr	Monitoring/Records	Y	C	
Part 4	S1 NOx Emissions < 0.15 g/bhp-hr	Monitoring/Records	Y	C	
Part 5	S2-6 NOx Emissions < 0.6 g/bhp-hr	Monitoring/Records	Y	C	
Part 6	Start-up and Shutdown < 1 hr	Monitoring/Records	Y	C	
Part 7	S1-S6 POC emissions < 0.2 g/ bhp-hr	Monitoring/Records	Y	C	
Part 8	LFG Fuel < 150 ppmv total sulfur, as H_2S	Monitoring/Records	Y	C	
Part 9	Abate S1-S6 with CO oxidation catalyst	Monitoring/Records	Y	C	
Part 10	Abate S1 with NOx SCR	Monitoring/Records	Y	C	
Part 11	Annual / Quadrennial Engine Source Testing Requirements	Testing	Y	C	
Part 12	Monitoring Records	Recordkeeping	Y	C	
BAAQMD Permits to Operate	**Cond #26864**				
Part 1	Facility-Wide CO Emissions Limit	Monitoring/Records	Y	C	
Part 2	Facility-Wide Record Keeping Requirements	Monitoring/Records	Y	C	

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Semiannual Monitoring and Deviation Report

Applicable Requirement	Description	Compliance Determination Method	Compliance (Y/N)	Continuous or Intermittent	Comments
BAAQMD Permits to Operate	**Cond #26865**				
Part 1	Landfill Gas Throughput to S-7	Monitoring/Records	Y	C	
Part 2	Landfill Gas Combustion in A-8	Monitoring/Records	Y	C	
Part 3	Landfill Gas Throughput to A-8, Heat Input Limit for Flare	Monitoring/Records	Y	C	
Part 4	NMOC Emission Limit for Flare	Testing	Y	C	
Part 5	Combustion Zone Temperature Limit for Flare	Monitoring/Records	Y	C	
Part 6	NOx Emission Limit for Flare	Testing	Y	C	
Part 7	CO Emission Limit for Flare	Testing	Y	C	
Part 8	SO2 Emission Limit for Flare	Testing	Y	C	
Part 9	Benzene, Formaldehyde, Acetaldehyde, and PAH Emissions from Flare	Testing	Y	C	
Part 10	Compliance Demonstration Test for Flare	Testing	Y	C	
Part 11	Landfill Gas Analysis Procedures	Testing	Y	C	
BAAQMD Permits to Operate	**Cond #26782**				
Part 1	LFG Condensate Throughput Limit 5000 gal/12-month	Monitoring/Records	Y	C	
Part 2	LFG Condensate Tank Recordkeeping Requirements	Monitoring/Records	Y	C	

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Semiannual Monitoring and Deviation Report

Federal Requirements

Applicable Requirement	Description	Compliance Determination Method	Compliance (Y/N)	Continuous or Intermittent	Comments
40 CFR Part 63, Subpart A	**National Emission Standards for Hazardous Air Pollutants: General Provisions**				
63.4	Prohibited activities and circumvention	Monitoring	Y	C	
63.5	**Preconstruction review and notification requirements**				
63.5(b)	Requirements for existing, newly constructed, and reconstructed sources	Monitoring, Reporting	Y	C	
63.6	**Compliance with standards and maintenance requirements**				
63.6(e)	Operation and maintenance requirements and SSM Plan	Monitoring	Y	C	
63.6(f)	Compliance with non-opacity emission standards	Monitoring	Y	C	
63.10	**Record Keeping and reporting requirements**				
63.10(b)	General record keeping requirements	Recordkeeping	Y	C	
63.10(b)(2)	For affected sources, maintain relevant records of:	Recordkeeping	Y	C	
63.10(b)(2)(i-v)	Records for startup, shutdown, malfunction, and maintenance	Recordkeeping	Y	C	
63.10(d)	General reporting requirements	Reporting	Y	C	
63.10(d)(5)	Startup, Shutdown, and Malfunction (SSM) Reports	Reporting	Y	C	

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Semiannual Monitoring and Deviation Report

Applicable Requirement	Description	Compliance Determination Method	Compliance (Y/N)	Continuous or Intermittent	Comments
40 CFR Part 63, Subpart ZZZZ	**National Emission Standards for Hazardous Air Pollutants: Stationary Internal Combustion Engines**				
63.6585	An area source of HAP emissions is a source that is not a major source	Monitoring/Records	Y	C	
63.6590(a)	Affected Source	Monitoring/Records	Y	C	
63.6590(a)(ii)	Existing Stationary RICE manufactured before 7/1/2007	Monitoring/Records	Y	C	
63.6595	Affected Source – major source of HAPs	Monitoring/Records	Y	C	
63.6603	Maintenance activities	Monitoring	Y	C	
63.6605	Compliance Limitations	Monitoring	Y	C	
63.6625	Monitoring, Operation and Maintenance Requirements	Monitoring	Y	C	
63.6640	Compliance Limitations	Monitoring	Y	C	
63.6655	Compliance Records	Recordkeeping	Y	C	
63.6650	Semiannual Monitoring Reports	Reporting	Y	C	
63.6660	Maintain records for a minimum period of 5 years	Recordkeeping	Y	C	

ATTACHMENT 3:

SUMMARY OF DEVIATIONS

AMERESCO HALF MOON BAY LLC
SEMIANNUAL MONITORING AND DEVIATION REPORT

JANUARY – JUNE 2025

Ameresco Half Moon Bay LLC
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Semiannual Monitoring and Deviation Report

Summary of Deviations

Applicable Requirement	Permit Unit(s)	Description of Deviation	Probable Cause of Deviation	Corrective / Preventative Actions
BAAQMD Rule 8-34-508	S-1, S-2, S-3, S-4, S-5, S-6 (Engines 1-6)	The prechamber compressor gas flow meter recorded invalid data from February 11, 2025 at 2:00PM PT to February 12, 2025 at 1:57PM PT (less than 24 total hours) after the equipment was brought online following its routine annual flow meter calibration service. Ameresco understands that this event deviations from BAAQMD Rule 8-34-508, which requires emission control systems to record gas flow data at least every 15 minutes. The other (6) flow meters were properly put back into service following the calibration, which are the main flow meters for the engines that account for at least 99% of the total gas flow to the engines. The prechamber flow accounts for a minimal amount of the gas sent to the engines (approximately 3-4 SCFM per engine) and can be estimated based on historical data, namely the correlation between the gas flow to the engines and prechamber.	The flow meter was properly calibrated and tested to verify they it work correctly once returned to operations. However, on February 12, 2025, Ameresco discovered that the manufacturer (Emerson) had forgotten to put the cap back on the prechamber compressor flow meter, which resulted in a blown fuse and pinched wires.	On February 12, 2025, immediately upon discovery/confirmation that the prechamber flow meter was not working properly, the Plant Operator contacted Emerson for assistance resolving the issue and performed on-site diagnosis. The Operator located a blown fuse and learned that the flow meter cap had pinched the two wires loomed to the sensor. The Operator made the necessary repairs to reestablish power to the sensor, and shortly after the prechamber flow data resumed recording as normal. Ameresco has continued to monitor the data since the flow meter was fixed and has not identified any issues or irregularities.

DRAFT HMB 2025-1 SAR 20250715

Final Audit Report 2025-07-16

Created:	2025-07-15
By:	Rebecca Sherwood (rsherwood@ameresco.com)
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