

APPENDIX D

COMPLIANCE REPORTS

COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

April 13, 2004

TO: BRIAN BATEMAN, DIRECTOR, ENGINEERING DIVISION
FROM: KELLY WEE, DIRECTOR OF ENFORCEMENT *KW*
SUBJECT: REVISED REVIEW OF COMPLIANCE RECORD OF:

PG&E COMPANY, HUNTER'S POINT POWER PLANT – SITE#A0024

Introduction

At the April 6, 2004 Informational Meeting on the Title V Permit Process for Pacific Gas & Electric Company (PG&E), staff was requested to provide more compliance history detail for this facility. Staff has revised this document to incorporate the additional details.

Background

This review was initiated as part of the District evaluation of a renewal application by PG&E for a Title V Permit. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of a renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems that have been identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on-going compliance.

Facility Summary

The primary function of this facility is to supply electrical power to the City and County of San Francisco. The primary electrical generation source is a natural gas fired boiler that powers a steam turbine. Continuous emission monitors, calibrated daily, are used to monitor the emissions from this source. This facility also operates two low usage gas turbines when mandated by the California Independent System Operator, usually when power reserves for San Francisco are low. The facility uses one jet fuel storage tank for storing jet fuel and all other storage tanks are empty. Some of these empty tanks are currently being dismantled. This facility also uses solvents and coatings for wipe cleaning, maintenance and painting.

This facility is permitted for two 25 MW standby combustion turbines, one 170 MW electric utility steam boiler, eight lubricating oil storage tanks (all empty), eight fuel oil tanks (all empty), one jet fuel tank, one jet fuel loading/unloading facility, one oil-water separator, one cold solvent degreaser, wipe cleaning, a coating operation, and a residual fuel oil handling facility.

Findings

The District did not issue any Notices of Violation during the permit term.

- II. The communities surrounding the facility have been publicly complaining about the emissions impact, from the power plant, on their neighborhoods and alleging health effects. Many persons attending the April 6, 2004 meeting indicated they have registered complaints against PG&E Hunter's Point with the District. However, a search of records shows no complaints to the District's 1-800-334-ODOR complaint phone line have been received alleging PG&E Hunters Point and no complaints attributing specific air pollution complaints to the power plant.
- III. During this review period, PG&E requested breakdown relief associated with two NO_x excesses and three inoperative monitors. Summaries of these events are as follows:
 - a. NO_x Excesses
 1. August 31, 2003. This excess was reported to the District by error. There was no excess emissions.
 2. September 4, 2003 at 1622 hours to 1658 hours. (Total of 36 minutes of NO_x excess) This excess occurred during boiler performance testing and is exempt per Regulation 9-11-111.
 - b. Inoperative Monitors (Total Downtime – 230 hours, 24 minutes)
 1. August 31, 2003 at 0702 hours to September 2, 2003, at 1358 hours. (Total of 54 hours, 56 minutes) Smart programmable logic controller failed.
 2. September 4, 2003 at 1419 hours to September 10, 2003 at 1535 hours. (Total of 144 hours, 16 minutes) Smart programmable logic controller failed. During the periods of these two reported inoperative monitors, the boiler was shut down for a majority of the time.
 3. December 8, 2003 at 0520 hours to December 9, 2003 at 1130 hours. (Total of 30 hours, 10 minutes) NO_x calibration problem.
- IV. There are no pending variances, abatement orders, or office conferences regarding this facility.

In addition, staff reviewed Pacific Gas & Electric's Title V Annual Compliance Certifications for 1999 – 2004.

Conclusions

The Compliance and Enforcement Division finds that ongoing compliance can be reasonably assured for this facility, due to the above record.

COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

March 8, 2004

TO: BRIAN BATEMAN, DIRECTOR, ENGINEERING DIVISION

FROM: KELLY WEE, DIRECTOR OF ENFORCEMENT 

SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

PG&E COMPANY, HUNTER'S POINT POWER PLANT – Site #A0024

Background

This review was initiated as part of the District evaluation of an application by Pacific Gas & Electric Company (PG&E) for a Title V Permit. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of a renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on going compliance.

Finding

The Enforcement Division staff has commenced a review of the records for Pacific Gas & Electric Company for the period of February 28, 2003 to February 28, 2004. During this review period, Pacific Gas & Electric's activities known to the District include:

The District did not issue any Notices of Violation during this review period.

No complaints have been received alleging PG&E as the source

During this review period PG&E requested breakdown relief associated with two indicated NOX excesses and three inoperative monitors. Both indicated excesses were found not to be in violation. All three inoperative monitors are back online and in compliance.

There are no pending variances, abatement orders, or office conferences regarding this facility.

In addition, staff reviewed Pacific Gas & Electric's Annual Compliance Certifications for 1999 – 2004 and found no outstanding compliance issues.

Conclusions

The Compliance and Enforcement Division finds that ongoing compliance can be reasonably assured for this facility, due to the above record.