



OFFICE OF THE VICE CHANCELLOR FOR RESEARCH  
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Via email to [compliance@baaqmd.gov](mailto:compliance@baaqmd.gov) and hard copy sent via U.S. Postal Service

April 30, 2024

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

TV Tracking #: 904

1.  RECEIVED IN  
ENFORCEMENT: 4/30/2024

RE: UC Berkeley, Facility #A0059 – Semi-Annual Monitoring Report for the Title V Operating Permit, October 01, 2023 – March 31, 2024

Dear Director of Compliance and Enforcement:

This monitoring report satisfies the semi-annual reporting requirements for the University of California, Berkeley (Facility #A0059), for the reporting period of **October 01, 2023 – March 31, 2024**.

Enclosed are the Tables of Applicable Emission Limits and Compliance Monitoring Requirements referenced in the Title V Operating Permit, issued July 12, 2022.

Below is the summary of DAS system events, CEMS system events and other events as previously submitted in our monthly emission reports during this time period:

#### Summary of DAS System Events

- **10/30/2023 (08:21-17:34):** BAD data was recorded due to plant offline.
- **11/05/2023 (18:00) – 11/11/2023 (13:00):** BAD data was recorded due to plant offline.
- **11/11/2023 (15:00-20:00):** BAD data was recorded due to plant offline.
- **12/06/2023 (04:01-11:20):** BAD data was recorded in the Main Stack due to process offline.
- **03/04/2024 (03:00-17:00):** BAD data was recorded due to plant offline.
- **03/10/2024 (02:00-03:00):** BAD data was recorded due to plant offline.

#### Summary of CEMS System Events

- **10/05/2023 (15:15-15:37):** CEMS offline due to high ambient temperatures.
- **11/17/2023 (10:00-12:00):** CEMS offline due to maintenance.
- **11/30/2023 (09:10-13:42):** CEMS offline due to maintenance.
- **12/01/2023 (11:00-13:00):** BAD data due to annual CEM Service.

- **03/12/2024 (11:00-12:00):** CEMS offline due to maintenance.
- **03/19/2024 (10:00-11:00):** CEMS offline due to maintenance.

### Summary of Other Events

- **11/07/2023:** The Main Stack and Bypass Stack NO<sub>x</sub>, CO, and O<sub>2</sub> analyzer calibrations were not performed.
- **11/29/2023:** The Bypass Stack NO<sub>x</sub>, CO, and O<sub>2</sub> analyzer failed the first calibration at 07:20. Analyzers were re-tested and successfully passed at 07:42.
- **11/30/2023:** The Main Stack NO<sub>x</sub>, CO, and O<sub>2</sub> analyzer failed the first calibration at 12:51. Analyzers were re-tested and successfully passed at 13:04.
- **12/01/2023:** The Bypass Stack NO<sub>x</sub>, CO, and O<sub>2</sub> analyzer failed the first calibration at 12:26. Analyzers were re-tested and successfully passed at 12:47.

### Schedule of Compliance Status Updates / Deviations

- **NOV A62678:** On Wednesday, October 18, 2023, UC Berkeley received a NOV (A62678) upon inspection from BAAQMD for an unpermitted portable vacuum excavator. The equipment is currently permitted under CARB PERP (#151725), however it needs to be permitted under BAAQMD Facility A0059 due to the engine size (>50 hp). UC Berkeley has retrieved necessary data from Facilities Services Utilities Plumbers, and has applied for a Permit to Operate. A 10-day deviation report was submitted to BAAQMD on October 27, 2023. A 30-day deviation report was submitted to BAAQMD on November 17, 2023.
- **NOV A62679:** On Wednesday, October 18, 2023, UC Berkeley received a NOV (A62679) upon inspection from BAAQMD for an unpermitted portable wood chipper. The equipment is currently permitted under CARB PERP (#171724/171725), however it needs to be permitted under BAAQMD Facility 16869 due to the engine size (>50 hp). UC Berkeley has retrieved necessary data from Facilities Services Landscaping, and has applied for a Permit to Operate. A 10-day deviation report was submitted to BAAQMD on October 27, 2023. A 30-day deviation report was submitted to BAAQMD on November 17, 2023.
- **NOV A62751/Deviation 7633:** On July 9, 2023 source 115 located at the Unit 2 Residence Hall was incidentally ran for approximately a 24-hour period. The automatic transfer switch system was being serviced by an outside contractor, who after repairs left the generator running. UC Berkeley maintenance staff adjusted the appropriate settings upon discovery. On September 11, 2023 BAAQMD inspected UC Berkeley generators, and noted this exceedance for source 115 upon review of the logbook held on-site. UC Berkeley has since confirmed that this generator has exceeded the annual hour limitations as defined in the permit. Residential and Student Service Programs maintenance staff have received training regarding this incident and have reviewed the Title V permit conditions. UC Berkeley submitted a 10-day deviation report (ID 7633) on September 21, 2023 and a 30-day deviation report (ID 7633) on October 10, 2023. On Wednesday, October 18, 2023, UC Berkeley received a NOV (A62751) upon inspection from BAAQMD for the generator exceedance. A 10-day deviation report was submitted to BAAQMD on October 27, 2023. A 30-day deviation report was submitted to BAAQMD on November 17, 2023.

- **NOV A62752:** On Wednesday, October 18, 2023, UC Berkeley received a NOV (A62752) upon inspection from BAAQMD for a generator exceedance at the Unit 1 Residence Hall, source 112. The logbook was reviewed on-site, and noted several long periods of run time throughout 2022-2023 that in total exceed the annual hour limitations as defined in the permit. UC Berkeley has communicated with Residential and Student Service Programs, regarding this violation and has met to review the Title V permit conditions. A 10-day deviation report was submitted to BAAQMD on October 27, 2023. A 30-day deviation report was submitted to BAAQMD on November 17, 2023.

If you have any questions regarding the enclosed information, please contact Miranda Monge at [mirandam17@berkeley.edu](mailto:mirandam17@berkeley.edu).

Based upon the information and belief formed after a reasonable inquiry, I, as the Responsible Official, certify the information contained in this report as accurate and true to the best of my knowledge.

Sincerely,



Katherine Yelick  
Vice Chancellor for Research

Enclosures

10- and 30-day Deviation Report – NOV A62728

10- and 30-day Deviation Report – Deviation 7633

10-day Deviation Report – NOV A62678, NOV A62679, NOV A62751, and NOV A675

cc Grace Leung, BAAQMD Inspector  
Norris Herrington, UC Berkeley  
Alicia Bihler, UC Berkeley  
Diane Coppini, UC Berkeley

**Table VII-A  
Applicable Limits and Compliance Monitoring Requirements  
S2, S3, S4, Boilers**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NOx	BAAQMD 9-7112.2	N		30 ppmvd @ 3% O <sub>2</sub> , dry	Condition 14330, Part 5	P/every calendar year of operation starting date of renewal of Title V permit in 2019	Portable monitor	X	
NOx	SIP 9-7-301.1	Y		30 ppmv @ 3% O <sub>2</sub> , dry, when operating on gaseous fuels	Condition 14330, Part 5	P/every calendar year of operation starting date of renewal of Title V permit in 2019	Portable monitor	X	
NOx	SIP 9-302.1	Y		40 ppmv @ 3% O <sub>2</sub> , dry, when operating on non-gaseous fuels		N		X	
NOx	SIP 9-7-303	Y		Weighted average of 9-7-301.1 and 9-7-302.1	BAAQMD 97-501	C	Non-resettable fuel meters	X	
NOx	SIP 9-7-305.1	Y		150 ppmv @ 3% O <sub>2</sub> , dry, when operating on non-gaseous fuels during natural gas curtailment		N		X	
NOx	SIP 9-7-306.1	Y		150 ppmv @ 3% O <sub>2</sub> , dry, when operating on non-gaseous fuels for equipment testing		N		X	
CO	BAAQMD 9-7112.2	N		400 ppmvd @ 3% O <sub>2</sub>	Condition 14330, Part 5	P/every calendar year of operation starting date of renewal of Title V permit in 2019	Portable monitor	X	
CO	SIP 9-7-301.2	Y		400 ppmv @ 3% O <sub>2</sub> , dry	Condition 14330, Part 5	P/every calendar year of operation starting date of renewal of Title V permit in 2019	Portable monitor	X	

CO	SIP 9-7-302.2	Y		400 ppmv @ 3% O2, dry		N		X	
CO	SIP 9-7-303	Y		400 ppmv @ 3% O2, dry		N		X	
CO	SIP 9-7-305.2	Y		400 ppmv @ 3% O2, dry		N		X	
CO	SIP 9-7-306.2	Y		400 ppmv @ 3% O2, dry		N		X	
Opacity	BAAQMD Regulation 6-1-301	N		>Ringelmann 1.0 for < 3 minutes in any hour	Condition 14330, Part 6	P/E, after firing for 200 hours on fuel oil	Visible emission inspection	X	
Opacity	SIP Regulation 6-301	Y		>Ringelmann 1.0 < 3 minutes in any hour	Condition 14330, Part 6	P/E, after firing for 200 hrs on fuel oil	Visible emission inspection	X	
FP	BAAQMD Regulation 6-1310.3	N		0.15 gr/dscf @ 6% O2		N		X	
FP	SIP Regulation 6-310.3	Y		0.15 gr/dscf @ 6% O2		N		X	
SO2	BAAQMD 9-1-301	Y		Property Line Ground Level Limits: < 0.5 ppm for 3 minutes and < 0.25 ppm for 60 min and < 0.05 ppm for 24 hours	None	N	N/A	X	
	BAAQMD 9-1-302	Y		300 ppm when burning gaseous fuels				X	
	BAAQMD 9-1-304	Y		0.5% wt Sulfur in liquid fuel		N		X	
Heat input limit	BAAQMD 9-7-112.2	N		< 120,012 MMBtu/any consecutive 12-month period for each boiler	BAAQMD 9-7-504	C	Non-resettable fuel meters for each fuel for each boiler within one year of renewal of Major Facility Review permit	X	

**Table VII-B Applicable Limits and Compliance Monitoring Requirements**

**S62, S63, S64, S65, S105, S106, S107, S108, S109, S110, S111, S112, S113, S114, S115, S116, S117, S118, S120, S121, S122, S123, S125, S126, S128, S129, S130, S131, S132, S133, S142, S143, S144, S145, S200, In-use Emergency Diesel Engine Generators**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6-1-303.1	N		>=Ringlemann 2.0 for < 3 minutes in any hour.		N		X	
Opacity	SIP Regulation 6-303.1	Y		>=Ringleman 2.0 for < 3 minutes in any hour		N		X	
FP	BAAQMD Regulation 6-1-310.1	N		0.15 gr/dscf		N		X	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		X	

SO <sub>2</sub>	BAAQMD 9-1-301	Y		Property Line Ground level limits: ≤0.5 ppm for 3 minutes and ≤0.25 ppm for 60 min. and ≤0.05 ppm for 24 hours.	None	N	N/A	X	
SO <sub>2</sub>	BAAQMD 9-1-304	Y		0.5% wt. Sulfur in liquid fuel		N		X	
	CARB ATCM 93115.5(a)(1)	N		Sulfur content of diesel fuel ≤ 15 ppmw		N		X	
Hours of Operation	BAAQMD 9-8-330.1	N		Unlimited hours for emergencies	BAAQMD 9-8-530.2	C P/M	Hour Meter, Records of Operating Hours	X	
Hours of Operation	BAAQMD 9-8-330.3	N	1/1/2012	50 hours per calendar year or permit limit whichever is lower for reliability-related activities	BAAQMD 9-8-530	C P/M	Hour Meter, Records of Operating Hours	X	
	BAAQMD Condition #22728 Part 2	Y		Applies to S145 Unlimited hours for emergencies	BAAQMD Condition 22728, Part 5	C P/M	Hour Meter, Record Keeping	X	
	BAAQMD Condition #22728 Part 1	Y		Applies to S145 ≤ 26 hours per year for reliability-related activities	BAAQMD Condition # 22728, Part 5	C P/M	Hour Meter, Record Keeping	X	
Hours of Operation	BAAQMD Condition # 22820, Part 2	Y		Applies to S105, S106, S107, S108, S111, S112, S113, S114, S115, S117, S120, S121, S122, S123, S125, S126, S128, S129, and S200 Unlimited hours for emergencies	BAAQMD Condition # 22820, Parts 3 and 4	C P/M	Hour meter, record keeping	X	
	BAAQMD Condition # 22820, Part 1	Y		Applies to S105, S106, S107, S108, S111, S112, S113, S114, S115, S117, S120, S121, S122, S123, S125, S126, S128, S129, and S200 ≤20 hours per year for reliability-related activities	BAAQMD Condition # 22820, Parts 3 and 4	C P/M	Hour meter, record keeping		X
	BAAQMD Condition # 22826, Part 2	Y		Applies to S62, S63, S64, S65, S133, S142, S143, S144, and S146 Unlimited hours for emergencies	BAAQMD Condition # 22826, Parts 3 and 4	C P/M	Hour meter, record keeping	X	
Hours of Operation	BAAQMD Condition # 22826, Part 1	Y		Applies to S62, S63, S64, S65, S133, S142, S143, S144, and S146 ≤ 26 hours per year for reliability-related activities	BAAQMD Condition # 22826, Parts 3 and 4	C P/M	Hour meter, record keeping	X	
	BAAQMD Condition # 22830, Part 2	Y		Applies to S109, S110, and S118 Unlimited hours for emergencies	BAAQMD Condition # 22830, Parts 3 and 4	C P/M	Hour meter, record keeping	X	
	BAAQMD Condition # 22830, Part 1	Y		Applies to S109, S110, and S118 ≤ 30 hours per year for reliability-related activities	BAAQMD Condition # 22830, Parts 3 and 4	C P/M	Hour meter, record keeping	X	

	BAAQMD Condition # 22850, Part 2	Y		Applies to S130, S131, and S132 Unlimited hours for emergencies	BAAQMD Condition # 22850, Parts 3 and 4	C P/M	Hour meter, Record keeping	X	
	BAAQMD Condition # 22850, Part 1	Y		Applies to S130, S131, and S132 ≤ 50 hours per year for reliability-related activities	BAAQMD Condition # 22850, Parts 3 and 4	C P/M	Hour meter, Record keeping	X	

**Table VII-C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S148, S149, S150, S152, S153, S154, S155, S156, S157, S158, S160, S162, S163, S164**  
**New Emergency Diesel Engine Generators**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6-1-303.1	N		>Ringlemann 2.0 for < 3 minutes in any hour.		N		X	
Opacity	SIP Regulation 6-303.1	Y		>Ringlemann 2.0 for < 3 minutes in any hour		N		X	
FP	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf		N		X	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		X	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		Property Line Ground level limits: <0.5 ppm for 3 minutes and < 0.25 ppm for 60 min. and < 0.05 ppm for 24 hours.	None	N	N/A	X	
	BAAQMD 9-1-304	Y		0.5% wt. Sulfur in liquid fuel		N		X	
	CARB ATCM 93115.5(a)(1)	N		Sulfur content of diesel fuel < 15 ppmw		N			
Hours of Operation	BAAQMD 9-8-330.1	N		Unlimited hours for emergencies	BAAQMD 9-8-530.2	C P/M	Hour Meter, Records of Operating Hours	X	
	BAAQMD 9-8-330.3	N	1/1/2012	50 hours per calendar year or permit limit whichever is lower for reliability-related activities	BAAQMD 9-8-530	C P/M	Hour Meter, Records of Operating Hours	X	
	BAAQMD Condition #22850, Part 2	Y		Unlimited hours for emergencies	BAAQMD Condition # 22820, Parts 3 and 4	C P/M	Hour Meter, Record Keeping	X	
Hours of Operation	BAAQMD Condition #22850, Part 1	Y		< 50 hours per year for reliability-related activities	BAAQMD Condition # 22820, Parts 3 and 4	C P/M	Hour Meter, Record Keeping	X	

**Table VII-D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S139, Emergency Natural Gas Engine Generator**  
**S140, Emergency Propane Engine Generator**

			Future	Emission Limit		Monitoring		Compliance
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Type of Limit	Emission Limit Citation	FE Y/N	Effective Date		Monitoring Requirement Citation	Frequency (P/C/N)	Monitoring Type	Yes	No
Opacity	BAAQMD Regulation 6-1-303.1	N			≥Ringelmann 2.0 for <3 minutes in any hour	N		X	
Opacity	SIP Regulation 6-303.1	Y			≥Ringelmann 2.0 for <3 minutes in any hour	N		X	
FP	BAAQMD Regulation 6-1-310	N			0.15 gr/dscf	N		X	
FP	SIP Regulation 6-310	Y			0.15 gr/dscf	N		X	
SO2	BAAQMD 9-1-301	Y			Property Line Ground Level Limits: ≤0.5 ppm for 3 minutes and ≤0.25 ppm for 60 min. and ≤0.05 ppm for 24 hours	N	N/A	X	
	BAAQMD 9-1-302	Y			300 ppm when burning gaseous fuels	N		X	
Hours of Operation	BAAQMD 9-8-330.1	N			Unlimited hours for emergencies	BAAQMD 9-8-530.2	C P/M	Hour meter, Records of Operating Hours	X
	BAAQMD 9-8-330.3	N	1/1/2012		50 hours per calendar year or permit limit whichever is lower for reliability-related activities	BAAQMD 9-8-530	C P/M	Hour meter, Records of Operating Hours	X
	BAAQMD Condition # 19533, Part 1	Y			50 hours per calendar year for reliability-related activities	BAAQMD Condition # 19533, Parts 2 and 3	P/E	Recordkeeping	X

**Table VII-E  
Applicable Limits and Compliance Monitoring Requirements  
S151, S159, Emergency Natural Gas Engine Generators**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6-1-303.1	N		≥Ringelmann 2.0 for <3 minutes in any hour		N		X	
Opacity	SIP Regulation 6-303.1	Y		≥Ringelmann 2.0 for <3 minutes in any hour		N		X	
FP	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf		N		X	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		X	
SO2	BAAQMD 9-1-301	Y		Property Line Ground Level Limits: ≤0.5 ppm for 3 minutes and ≤0.25 ppm for 60 min and ≤0.05 ppm for 24 hours	None	N	N/A	x	
	BAAQMD 9-1-302	Y		300 ppm		N		X	
	BAAQMD Condition #23107, Part 1	Y		Applies to S159: 50 hours per calendar year for reliability-related activities	BAAQMD Condition 23107, Parts 2 and 3	P/E	Recordkeeping	X	
	BAAQMD Condition # 23112, Part 1	Y		Applies to S151: 50 hours per calendar year for reliability-related activities	BAAQMD Condition 23112, Parts 2 and 3	P/E	Recordkeeping	X	



**Table VII-F  
Applicable Limits and Compliance Monitoring Requirements  
S201, Turbine**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NOx	BAAQMD 9-9-301.2 and 9-9-603	N		0.70 lbs/MW-hr or 20.2 ppmv, 3-hr average when burning natural gas	BAAQMD 9-9-501	C	CEM	X	
NOx	SIP 9-9-303.2	Y		20.2 ppmv @ 15% O <sub>2</sub> , dry (adjusted per 9-9-401), except during start-up	SIP 9-9-501	C	CEM	X	

	BAAQMD Condition #366, Part 4	Y		0.70 lbs/MW-hr or 20.2 ppmv - natural gas: @ 15% O <sub>2</sub> , 3 hr avg, except during start-up	BAAQMD Condition #366, Part 12	C	CEM	X	
NOx	BAAQMD Condition #366, Part 5	Y		0.70 lbs/MW-hr or 20.2 ppmv - natural gas: @ 15% O <sub>2</sub> (combined S201 & S202), 3 hr avg, except during start-up	BAAQMD Condition #366, Part 12	C	CEM	X	
	BAAQMD Condition #366, Part 10	Y		547 lb/day when burning natural gas (combined S201 & S202)	BAAQMD Condition #366, Part 12	C	CEM	X	
	NSPS Subpart GG, 60.332(a)(1)	Y		99 ppmv @ 15% O <sub>2</sub> dry, 4-hr average	NSPS Subpart GG, 60.334(b)	C	CEM	X	
CO	BAAQMD Condition #366, Part 4a	Y		200 ppm @ 15% O <sub>2</sub> , 3-hour average except during start-up	BAAQMD Condition #366, Part 12a	C	CEM	X	
CO	BAAQMD Condition #366, Part 5a	Y		200 ppm @ 15% O <sub>2</sub> (combined S201 & S202) 3-hour average except during start-up	BAAQMD Condition #366, Part 12a	C	CEM	X	
CO	BAAQMD Condition #366, Part 10	Y		2,195 lb/day (combined S201 & S201)	BAAQMD Condition #366, Parts 10, 12a, and 18	C	CEM, annual source test	X	
SO <sub>2</sub>	BAAQMD 9-1-301	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		X	
SO <sub>2</sub>	BAAQMD 9-1-302	Y		300 ppm (dry)		N		X	

SO2	NSPS Subpart GG, 60.333 (a)	Y		0.015% (vol) @ 15% O2 (dry), or 0.8% sulfur in gaseous fuel by weight	NSPS Subpart GG, 60.334 (h)(3)	P/M or EN	Monthly gaseous fuel analysis or current, valid purchase contract, tariff sheet or transportation contract	X	
Opacity	BAAQMD 6-1-301	N		≥Ringelmann No. 1 for <3 minutes in an hour		None		X	
Opacity	SIP 6-301	Y		≥Ringelmann No. 1 for <3 minutes in an hour		None		X	
FP	BAAQMD 6-1-310.1 and 6-1-310.3	N		0.15 grain/dscf @ 6% O2		N		X	
FP	SIP 6-310	Y		0.15 grain/dscf @ 6% O2		N		X	

<sup>1</sup> Ground Level Concentration

**Table VII-G  
Applicable Limits and Compliance Monitoring Requirements  
S-202, Duct Burner**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NOx	BAAQMD 9-9-301.2	N		0.70 lbs/MW/hr or 15 ppmv, 3-hr average when burning natural gas	BAAQMD 9-9-501	C	CEM	X	
NOx	SIP 9-9-303.2	Y		20.2 ppmv @ 15% O2, dry (adjusted per 9-9-401), except during start-up	BAAQMD 9-9-501	C	CEM	X	
NOx	BAAQMD Cond #366, Part 5	Y		0.70 lbs/MW-hr or 15 ppmv - natural gas: @ 15% O2 (combined S201 & S202), 3 hr avg, except during start-up	BAAQMD Condition #366, Part 12	C	CEM	X	

	BAAQMD Condition #366, Part 10	Y		547 lb/day (combined S201 & S202)	BAAQMD Condition #366, Parts 9 and 12	C	CEM	X	
	NSPS Subpart GG, 60.332(a)(1)	Y		99 ppmv @ 15% O2 dry, 4-hr average	NSPS Subpart GG, 60.334(b)	C	CEM	X	
CO	BAAQMD Condition #366, Part 5a	Y		200 ppm @ 15% O2 (combined S201 & S202) 3-hour average except during start-up	BAAQMD Condition #366, Part 12a	C	CEM	X	
CO	BAAQMD Condition #366, Part 10	Y		2,195 lb/day (combined S201 & S202)	BAAQMD Condition #366, Parts 10, 12a, and 18	C	CEM, annual source test	X	

SO2	BAAQMD 9-1-301	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		X	
SO2	BAAQMD 9-1-302	Y		300 ppm (dry)		N		X	
SO2	NSPS Subpart GG, 60.333 (a)	Y		0.015% (vol) @ 15% O2 (dry) or 0.8% sulfur in gaseous fuel by weight	NSPS Subpart GG, 60.334 (h)(3)	P/M or EN	Monthly gaseous fuel analysis or current, valid purchase contract, tariff sheet or transportation contract	X	
Opacity	BAAQMD 6-1-301	N		≥Ringelmann No. 1 for < 3 minutes in an hour		None		X	
Opacity	SIP 6-301	Y		≥Ringelmann No. 1 for < 3 minutes in an hour		None		X	
FP	BAAQMD 6-1-310.1 and 6-1-310.3	N		0.15 grain/dscf @ 6% O2		N		X	
FP	SIP 6-310	Y		0.15 grain/dscf @ 6% O2		N		X	

**Table VII-H  
Applicable Limits and Compliance Monitoring Requirements  
S100, Facility-wide Painting Operations**

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD 8-19-302	Y		Baked Coatings: 2.3 lb/gal Air Dried Coatings: 2.8 lb/gal	BAAQMD 8-19-501 and Condition 21880, Part 1c.iv	P/W/M	Records	X	
VOC	BAAQMD 8-19-312.1	Y		Camouflage: Baked Coatings: 3.0 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, Part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-19-312.3	Y		Heat Resistant: Baked Coatings: 3.0 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, Part 1c.iv	P/W/M	Records	X	
VOC	BAAQMD 8-19-312.4	Y		High Performance Architectural Baked Coatings: 3.5 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, Part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-19-312.5	Y		Metallic Topcoat Baked Coatings: 3.0 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, Part 1c.iv	P/W/M	Records	X	

<sup>1</sup> Ground Level Concentration

	BAAQMD 8-19-312.7	Y		Pretreatment Wash Primer Baked Coatings: 3.5 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-19-312.8	Y		Silicon Release Baked Coatings: 3.5 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-19-312.9	Y		Solar Absorbent Baked Coatings: 3.0 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-19-312.12	Y		Extreme Performance Baked Coatings: 3.5 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
VOC	BAAQMD 8-19- 312.13	Y		High Temperature Baked Coatings: 3.5 lb/gal Air Dried Coatings: 3.5 lb/gal	BAAQMD 8-19-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-23-301	Y		2.1 lb/gal	BAAQMD 8-23-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-31-302	Y		2.8 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-31-306.1	Y		Flexible Parts: Flexible Primer: 4.1 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-31-306.2	Y		Flexible Parts: Color Topcoat: 3.8 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
VOC	BAAQMD 8-31-306.3	Y		Flexible Parts: Base coat/clear coat (combined system): 2.8 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
VOC	BAAQMD 8-31-309.1	Y		Camouflage: 3.5 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-31-309.2	Y		Conductive: 2.7 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-31-309.3	Y		Metallic Topcoat: 3.5 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-31-309.4	Y		Extreme Performance: 6.2 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	

	BAAQMD 8-31-309.5	Y		High Gloss: 3.5 lb/gal	BAAQMD 8-31-501 and Condition 21880, part 1c.iv	P/W/M	Records	X	
VOC	BAAQMD 8-31-309.6	Y		Optical: 6.7 lb/gal	BAAQMD 8-31-501 and Condition 21880, Part 1c.iv	P/W/M	Records	X	
	BAAQMD 8-31-301	Y		See rule		N		X	
Throughput	Condition 21880, part 1a	Y		Non-water-based coating < 80 gal/consecutive 12month period	Condition 21880, part 1c.iii	P/W/M	Recordkeeping	X	
	Condition 21880, part 1a	Y		Water-based coating <250 gal/consecutive 12-month period	Condition 21880, part 1c.iii	P/W/M	Recordkeeping	X	
	Condition 21880, part 1b	Y		Cleanup and surface preparation solvent <10 gal/consecutive 12month period	Condition 21880, part 1c.i and 1c.iii	P/W/M	Recordkeeping	X	
	Condition 21880, part 1b	Y		Organic thinner < 10 gal/consecutive 12month period	Condition 21880, part 1c.ii and 1c.iii	P/W/M	Recordkeeping	X	



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OFFICE OF ENVIRONMENT, HEALTH AND SAFETY  
317 UNIVERSITY HALL  
BERKELEY, CALIFORNIA 94720-1150

Via email to: [compliance@baaqmd.gov](mailto:compliance@baaqmd.gov)

September 21, 2023

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: UC Berkeley, Facility #A0059 –10-Day Deviation Report

Dear Director of Compliance and Enforcement:

This letter is to inform you of UC Berkeley's deviation from the Title V Operating Permit, issued July 12, 2022.

On July 9, 2023 source 115 located at the Unit 2 Residence Hall was incidentally ran for approximately a 24-hour period. The automatic transfer switch system was being serviced by an outside contractor, who after repairs left the generator running. UC Berkeley maintenance staff adjusted the appropriate settings upon realization. On September 11, 2023 the Bay Area Air Quality Management District inspected UC Berkeley generators, and noted this exceedance for source 115 upon review of the logbook held on-site. UC Berkeley Environment, Health, & Safety has since confirmed that this generator has exceeded the annual hour limitations for a non-emergency purpose as defined in the permit.

UC Berkeley Environment, Health, & Safety is in communication with Residential and Student Service Programs maintenance staff regarding this incident and has scheduled a meeting to review permit conditions and prevent similar violations from reoccurring.

If you have any questions or concerns, please contact Miranda Monge at [mirandam17@berkeley.edu](mailto:mirandam17@berkeley.edu).

Sincerely,

A handwritten signature in cursive script that reads "Miranda Monge".

Miranda Monge  
Environmental Specialist

Cc Grace Leung, BAAQMD Inspector  
Alicia Bihler, UC Berkeley

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OFFICE OF ENVIRONMENT, HEALTH AND SAFETY  
317 UNIVERSITY HALL  
BERKELEY, CALIFORNIA 94720-1150

Via email to: [compliance@baaqmd.gov](mailto:compliance@baaqmd.gov)

October 10, 2023

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: UC Berkeley, Facility #A0059 –30-Day Deviation Report

Dear Director of Compliance and Enforcement:

This letter is to follow-up on UC Berkeley's 10-day deviation notice emailed on September 21, 2023. UC Berkeley Environment, Health & Safety has since met with Residential and Student Service Programs facilities management to further discuss this incident and review permit conditions.

If you have any questions or concerns, please contact Miranda Monge at [mirandam17@berkeley.edu](mailto:mirandam17@berkeley.edu).

Sincerely,

*Miranda Monge*

Miranda Monge  
Environmental Specialist

Cc Grace Leung, BAAQMD Inspector  
Alicia Bihler, UC Berkeley





OFFICE OF ENVIRONMENT, HEALTH AND SAFETY  
317 UNIVERSITY HALL  
BERKELEY, CALIFORNIA 94720-1150

Via email to: [compliance@baaqmd.gov](mailto:compliance@baaqmd.gov)

October 27, 2023

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: UC Berkeley, Facility #A0059 –10-Day Deviation Report (NOV A62678, NOV A62679, NOV A62751, and NOV A62752)

Dear Director of Compliance and Enforcement:

This letter is to inform you of UC Berkeley's deviation from the Title V Operating Permit, issued July 12, 2022.

On October 18, 2023, UC Berkeley received four Notice of Violations upon inspection from BAAQMD – NOV A62678 unpermitted portable ditch witch (CARB PERP #151725), NOV A62679 unpermitted portable wood chipper (CARB PERP #171724/171725), NOV A62751 permitted hour exceedance at Unit 2 Residence Hall (S-115), and NOV A62752 permitted hour exceedance at Unit 1 Residence Hall (S-112).

For NOV A62678, UC Berkeley will continue to work with the Air District to obtain a Permit to Operate for the portable ditch witch. The equipment is currently permitted under CARB PERP, however it needs to be permitted under BAAQMD Facility A0059 due to the engine >50 hp. UC Berkeley Environment, Health, & Safety is in communication with the operating department, Facilities Services Utilities Plumbers, regarding this violation and will work on obtaining the necessary information for the BAAQMD permit application.

For NOV A62679, UC Berkeley will continue to work with the Air District to obtain a Permit to Operate for the portable wood chipper. The equipment is currently permitted under CARB PERP, however it needs to be permitted under BAAQMD Facility 16869 due to the engine >50 hp. UC Berkeley Environment, Health, & Safety is in communication with the operating department, Facilities Services Landscaping, regarding this violation and will work on obtaining the necessary information for the BAAQMD permit application.

For NOV A62751, UC Berkeley will continue to monitor usage of the Unit 2 generator (S-115) until it returns to compliance. UC Berkeley Environment, Health, & Safety is in communication with the operating department, Residential and Student Service Programs, regarding this violation and will meet to review the Title V permit conditions.

For NOV A62752, UC Berkeley will continue to monitor usage of the Unit 1 generator (S-112) until it returns to compliance. UC Berkeley Environment, Health, & Safety is in communication with the operating department, Residential and Student Service Programs, regarding this violation and will meet to review the Title V permit conditions.

If you have any questions or concerns, please contact Miranda Monge at [mirandam17@berkeley.edu](mailto:mirandam17@berkeley.edu).

Sincerely,

*Miranda Monge*

Miranda Monge  
Environmental Specialist

Cc Grace Leung, BAAQMD Inspector  
Alicia Bihler, UC Berkeley



OFFICE OF ENVIRONMENT, HEALTH AND SAFETY  
317 UNIVERSITY HALL  
BERKELEY, CALIFORNIA 94720-1150

Via email to: [compliance@baaqmd.gov](mailto:compliance@baaqmd.gov)

November 17, 2023

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: UC Berkeley, Facility #A0059 –30-Day Deviation Report (NOV A62678, NOV A62679, NOV A62751, and NOV A62752)

Dear Director of Compliance and Enforcement:

This letter is to inform you of UC Berkeley's deviation from the Title V Operating Permit, issued July 12, 2022.

On October 18, 2023, UC Berkeley received four Notice of Violations upon inspection from BAAQMD – NOV A62678 unpermitted portable ditch witch (CARB PERP #151725), NOV A62679 unpermitted portable wood chipper (CARB PERP #171724/171725), NOV A62751 permitted hour exceedance at Unit 2 Residence Hall (S-115), and NOV A62752 permitted hour exceedance at Unit 1 Residence Hall (S-112). On October 27, 2023, UC Berkeley submitted a 10-Day Deviation Report for NOV A62678, NOV A62679, NOV A62751, and NOV A62752 to BAAQMD.

For NOV A62678 and NOV A62679, UC Berkeley has received guidance from the Air District on what forms to include as part of the permit application package. UC Berkeley will continue to draft the necessary documents, and then submit to the Air District for review. Once the permits are received, UC Berkeley Environment, Health, & Safety will review the permit requirements with the operating departments.

For NOV A62751 and NOV A62752, UC Berkeley will continue to monitor generator usage to only include normal reliability-related operations (emergency generators are tested twice a month for approximately 30 minutes) and any emergency runs. UC Berkeley will increase outreach to Residential Student Service Programs maintenance staff on permit conditions to avoid any future exceedances in hour limitations.

If you have any questions or concerns, please contact Miranda Monge at [miramdam17@berkeley.edu](mailto:miramdam17@berkeley.edu).

Sincerely,

A handwritten signature in cursive script that reads "Miranda Monge".

Miranda Monge  
Environmental Specialist

Cc Grace Leung, BAAQMD Inspector  
Alicia Bihler, UC Berkeley