

Comments to BAAQMD from EBMUD

From: Dembiczak, Chris <chris.dembiczak@ebmud.com>
Sent: Thursday, August 15, 2019 1:45 PM
To: Simrun Dhoot
Cc: Brenda Cabral
Subject: Comments on EBMUD Title V Permit Public Draft

Hi Simrun,

I read over the public draft of our Title V permit that is posted on the BAAQMD website and have a few additional comments.

1)Page 10, Abatement Devices, missing new abatement devices at IPS (S-110). A-463 and A-464 were added to the blue Permit to Operate a while ago.

2)Page 64, Permit Condition 17335 does not match the existing conditions in our blue Permit to Operate. Related issue to item above.

3)Page 71, Permit Condition 20651, numbering appears off from items 10-20.

4)Page 80, Permit Condition 24050, item 5

a. The permit condition requires us to record SO2 exhaust concentration every day. We cannot do this. I believe the intent of KKKK is to do daily monitoring of the sulfur content of the fuel gas, not the exhaust gas. I suggest this edit: "The owner or operator shall determine and record the turbine fuel gas sulfur content value SO2 exhaust concentration at least one time every day..."

b. Cited section 60.4333(a)(3) does not exist

Please let me know if you have any questions.

Thanks,

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