



City of Santa Rosa

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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

Wayne Kino
Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

ATTN: TITLE V REPORTS

RE: SEMI-ANNUAL MONITORING REPORT: JULY – DECEMBER 2013
CITY OF SANTA ROSA WASTEWATER TREATMENT FACILITY
TITLE V - MAJOR FACILITY REVIEW PERMIT #A1403

Dear Mr. Kino:

This report is provided to fulfill semi-annual monitoring requirements of the Major Facility Review Permit (MFRP) issued to the City of Santa Rosa Wastewater Treatment Facility for the six month monitoring period July 1, 2013 – December 31, 2013. Pursuant to the monitoring requirements specified in the MFRP, please note the following:

- On November 18, 2013, a Permit to Operate was formally issued by the Bay Area Air Quality Management District (BAAQMD) for our four new digester/natural gas fueled lean burn internal combustion engines: S-200, S-201, S-202 and S-203.
- During this period, monthly portable analyzer testing was formally initiated for emissions from digester/natural gas fueled internal combustion engines: S-200, S-201, S-202 and S-203. Our contractor, Blue Sky Environmental, Inc. performed monthly emissions testing in October, November and December. In October and November, engine emissions testing remained below the limits listed in the MFRP. However, in December, NO_x, ppm @ 15% O₂ levels exceeded the action limits set forth in Table VII-H of the MFRP, BAAQMD Regulation 9-8-503. Please see attached monthly reports for additional details.
- Also during this period, the level of H₂S of digester gas going into engines S-200, S-201, S-202 and S-203 exceeded Permit Condition 18871(5) several times. At the time of this semi-annual monitoring report, the City is continuing to work with BAAQMD staff to determine an acceptable approach toward this concern. A copy of our January 24, 2014 email to the BAAQMD is enclosed. This email was provided upon the request of BAAQMD and provides a detailed description of the City's ongoing difficulties related to abatement device, A-200, iron sponge performance and associated H₂S removal efficiencies.

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