

TV Tracking #: 934 (Semi-Annual)

1. D RECEIVED IN ENFORCEMENT: 07/17/2024

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

July 16, 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

RE: Semiannual Monitoring and Deviation Report: 1/1/24 – 6/30/24 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, 2024 through June 30, 2024.

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 2024** 

## **Permit Services Division**

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

Name of Responsible Official

# Major Facility Review Certification Statement

FACILITY NAME Ameresco Half Moon Bay LLC FACILITY # 17040
STATEMENT OF COMPLIANCE:
certify the following:
Read each statement carefully and initial each box for confirmation.
Based on information and belief formed after reasonable inquiry, the source(s) identified in a Applicable Requirements and Compliance Summary form that is(are) in compliance will continue comply with the applicable requirement(s);
Based on information and belief formed after reasonable inquiry, the source(s) identified in a Applicable Requirements and Compliance Summary form will comply with future-effective application requirement(s), on a timely basis;
Based on information and belief formed after reasonable inquiry, information on application formal all accompanying reports, and other required certifications is true, accurate, and complete;
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.
certify the following:
Based on information and belief formed after reasonable inquiry, the source(s) identified in a Schedule of Compliance application form that is(are) not in compliance with the application requirement(s) will comply in accordance with the attached compliance plan schedule.
Harold Stewart  Jul 17, 2024
Signature of Responsible Official Date
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## **ATTACHMENT 2:**

## SEMIANNUAL COMPLIANCE REPORT

# AMERESCO HALF MOON BAY LLC SEMIANNUAL MONITORING AND DEVIATION REPORT

**JANUARY – JUNE 2024** 

Plant Number: 17040

12310 San Mateo Road Half Moon Bay, CA 94019

Reporting Period: January 1, 2024 to June 30, 2024

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

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	Υ	I	See: "Summary of Deviations".				
523.2	Limit on duration of inoperation	Monitoring	Υ	С					
523.3	Report monitored violations of any applicable limits within 96 hours	Reporting	Υ	С					
523.4	Record inoperation, tests, calibrations, adjustments, & maintenance	Recordkeeping	Υ	С					
523.5	Maintain and calibrate monitors	Monitoring	Υ	С					
BAAQMD Regulation 2 Rule 1	General Requirements								
2-1-405	Posting of Permit to Operate	Monitoring	Υ	С					
2-1-429	Federal Emissions Statement	Reporting	Υ	С					
BAAQMD Regulation 3	Fees		_						
3-319	Major Stationary Source Fees (Schedule M)	Monitoring	Υ	С					
3-320	Toxic Inventory Fee (Schedule N)	Monitoring	Υ	С					
3-327	Permit to Operate, Renewal Fees (Schedule B)	Monitoring	Υ	С					

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

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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					
8-34-412	Compliance Demonstration Tests	Monitoring	Υ	С		
8-34-413	Performance Test Report	Reporting	Υ	С		
8-34-501	Operating Records	_				
501.2	Emission Control System Downtime	Recordkeeping	Υ	С		
501.3	Continuous Temperature	Recordkeeping	Υ	С		
501.4	Testing Records	Recordkeeping	Υ	С		
501.6	Leak Discovery and Repair Records	Recordkeeping	Υ	С		
501.10	Continuous Gas Flow Records	Recordkeeping	Υ	С		
501.11	Records of Key Emission Control System Operating Parameters	Recordkeeping	Υ	С		
501.12	Maintain records 5 years	Recordkeeping	Υ	С		
8-34-503	Landfill Gas Collection and Emission Control System Leak Testing	Monitoring	Υ	С		
8-34-504	Portable Hydrocarbon Detector	Monitoring	Υ	С		
8-34-507	Continuously operate temperature recording device (flare)	Monitoring	Υ	С		
8-34-508	Gas flow meter records flow rate at least every 15 minutes	Monitoring/Records	Υ	I	See: "Summary of Deviations".	
8-34-509	Key emission control system operating parameters	Monitoring/Records	Υ	С		

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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 SO₂ Concentration Limit	N/A	N/A	N/A					
9-1-302	General Emission Limitations	Monitoring	Υ	С					
BAAQMD Regulation 9 Rule 2	Inorganic Gaseous Pollutants – Hydrogen Sulfide								
9-2-301	Ground Level H₂S 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	Υ	С					
302.3	CO Emission Limit	Monitoring	Υ	С					
9-8-501	Initial Demonstration of Compliance	Monitoring	Υ	С					
9-8-502.3	Compliance Demonstration Test Records	Recordkeeping	Υ	С					
9-8-503	Quarterly Demonstration of Compliance (ECOM)	Monitoring	Υ	С					

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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 Perm	its to Operate Cond #25465					
Part 1	Fuel Restrictions and Bypass Event Limitations	Monitoring/Records	Υ	С		
Part 2	Heat Input Limits and Monitoring Requirements	Monitoring/Records	Υ	С		
Part 3	CO Emissions < 1.8 g/bhp-hr	Monitoring/Records	Υ	С		
Part 4	S1 NOx Emissions < 0.15 g/bhp-hr	Monitoring/Records	Υ	С		
Part 5	S2-6 NOx Emissions < 0.6 g/bhp-hr	Monitoring/Records	Υ	С		
Part 6	Start-up and Shutdown < 1 hr	Monitoring/Records	Υ	С		
Part 7	S1-S6 POC emissions < 0.2 g/ bhp-hr	Monitoring/Records	Υ	С		
Part 8	LFG Fuel < 150 ppmv total sulfur, as H₂S	Monitoring/Records	Υ	С		
Part 9	Abate S1-S6 with CO oxidation catalyst	Monitoring/Records	Υ	С		
Part 10	Abate S1 with NOx SCR	Monitoring/Records	Υ	С		
Part 11	Annual / Quadrennial Engine Source Testing Requirements	Testing	Υ	С		
Part 12	Monitoring Records	Recordkeeping	Υ	С		
BAAQMD Perm	BAAQMD Permits to Operate Cond #26864					
Part 1	Facility-Wide CO Emissions Limit	Monitoring/Records	Υ	С		
Part 2	Facility-Wide Record Keeping Requirements	Monitoring/Records	Υ	С		

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

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## **Semiannual Monitoring and Deviation Report**

#### **Federal Requirements**

Applicable Requirement	Compliance Description 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	Υ	С			
63.5	Preconstruction review and notification requirements						
63.5(b)	Requirements for existing, newly constructed, and reconstructed sources	Monitoring, Reporting	Υ	С			
63.6	Compliance with standards and maintenance requirements						
63.6(e)	Operation and maintenance requirements and SSM Plan	Monitoring	Υ	С			
63.6(f)	Compliance with non-opacity emission standards	Monitoring	Υ	С			
63.10	Record Keeping and reporting requirements						
63.10(b)	General record keeping requirements	Recordkeeping	Υ	С			
63.10(b)(2)	For affected sources, maintain relevant records of:	Recordkeeping	Υ	С			
63.10(b)(2)(i- v)	Records for startup, shutdown, malfunction, and maintenance	Recordkeeping	Υ	С			
63.10(d)	General reporting requirements	Reporting	Υ	С			
63.10(d)(5)	Startup, Shutdown, and Malfunction (SSM) Reports	Reporting	Υ	С			

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



## **ATTACHMENT 3:**

## **SUMMARY OF DEVIATIONS**

# AMERESCO HALF MOON BAY LLC SEMIANNUAL MONITORING AND DEVIATION REPORT

**JANUARY – JUNE 2024** 

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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 1-523 (RCA 200113)	N/A (Gas Chromatograph)	On January 19, 2024, during a routine review of operational data, Ameresco discovered that the facility's gas chromatograph (GC) started recording static/invalid data at 9:13AM PT on January 18, 2024, when the unit was intentionally placed offline for its routine annual calibration service performed by the equipment manufacturer, Emerson. The GC remained offline for maintenance until 2:32PM PT on January 19, 2024.  Because the GC was out of service for more than 24 hours while the plant was operational, Ameresco considered this to be an RCA event.	The GC was out of service for more than 24 hours due to it undergoing schedule, routine maintenance (calibration service) on January 18, 2024 through January 19, 2024. Ameresco makes every attempt to ensure the GC is placed back into operations before the 24-hour mark, however because maintenance was ongoing at that time, it remained offline.	Emerson worked with facility personnel to conduct the calibration service and return the GC to operations as soon as possible; however, this required the unit to be offline for more than 24 hours. The GC could not be placed back into service until the maintenance was completed and the unit was confirmed to be working properly. While the GC was offline, facility personnel collected two gas composition readings with a GEM on January 19, 2024.
BAAQMD Rule 8-34-508	S-5 (Engine 5)	On April 19, 2024, the gas flow meter for Engine 5 recorded invalid data for (40) 15-minute periods (15-minute periods ending 1:00AM PT - 10:45AM PT) after the engine 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 flow meter was not working properly following calibration due to a blown fuse. Ameresco believes that the blown fuse was not discovered during the service because the facility was offline at the time, which is why it was discovered after the service was completed and the engine was returned to service.	Facility personnel worked with Emerson (the equipment manufacturer who performed the calibration service) to repair the Engine 5 gas flow meter issues and return the device to operations as soon as possible. This entailed replacing the blown fuse and ensuring that all components were working properly. Ameresco has continued to monitor Engine 5's gas flow meter operations and data and has not identified any abnormalities or issues following the calibration service.

12310 San Mateo Road

Half Moon Bay, CA 94019

## DRAFT HMB 2024-1 SAR 20240716

Final Audit Report 2024-07-1

Created: 2024-07-16

By: Rebecca Sherwood (rsherwood@ameresco.com)

Status: Signed

Transaction ID: CBJCHBCAABAA-Rs1h\_V4AtNEqrLQTB9UkZYPCMI\_MLNx

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Document e-signed by Harold Stewart (hstewart@ameresco.com)

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