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January 22, 2020

Director of Enforcement and Compliance
Bay Area Air Quality Management District
375 Beale St, Ste 600
San Francisco, CA 94105

857/196

**Re: Second Half 2019 Semiannual Monitoring Report
Ameresco Keller Canyon LLC (Facility ID #B7667)**

BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

2020 JAN 24 AM 11:41

RECEIVED

Dear Director:

Ameresco Keller Canyon LLC is submitting the Second Half 2019 Semiannual Monitoring Report as required by Condition I.F. of our Major Facility Review Permit, certified by a Responsible Official.

Should you have comments or need more information on this report, please contact me at (508) 661-2242 or amcclelland@ameresco.com.

Ameresco Keller Canyon LLC;
Ameresco LFG Holdings III LLC, its sole member;
Ameresco, Inc., its sole member

Andrew J. McClelland
Sr Environmental Compliance Specialist

Enclosures: Second Half 2019 Semiannual Monitoring Report
Responsible Official Certification



AMERESCO KELLER CANYON LLC
MAJOR FACILITY REVIEW PERMIT (PART 70)
SEMIANNUAL COMPLIANCE REPORT CERTIFICATION

SITE: Ameresco Keller Canyon LLC	FACILITY ID#: 17667
REPORTING PERIOD: from 07/01/2019 through 12/31/2019	

CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that, based on information and belief formed after reasonable inquiry, all information provided in the attached Compliance Report for the semiannual reporting period is true, accurate, and complete.



Signature of Responsible Official

1/18/20

Date

Nathan W. Hall

Name of Responsible Official (Please Print)

Vice President - Asset Operations, Ameresco, Inc.;
Sole member of Ameresco LFG Holdings III LLC;
Sole member of Ameresco Keller Canyon LLC

Title of Responsible Official (Please Print)

Mail to: Director of Compliance and Enforcement
BAAQMD
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V Reports

Semiannual Compliance Report
Ameresco Keller Canyon LLC **Major Facility Review Permit**

Facility #: 17667
 Address: 901A Bailey Road, Pittsburg 94565

Semi-Annual Reporting Period: 07/01/2019 through 12/31/2019

Table IV-A: Source Specific Requirements Sources: S-1, S-2, S-3: LFG-Fired Internal Combustion Engines & Gas Treatment

Applicable	Requirement Citation	Compliance Method	Frequency (P/C/NA)	Compliance (Y/N)	Continuous or Intermittent
BAAQMD Regulation 1: General Provisions & Definitions					
1-523	Parametric Monitoring and Recordkeeping Procedures				
1-523.1	Report periods of inoperation > 24 hours	Reporting	P	Y	C
1-523.2	Limit on duration of inoperation	Monitoring	C	Y	C
1-523.3	Report violations of any applicable limits	Reporting	P	Y	C
1-523.4	Record inoperation, tests, calibrations, adjustments, & maintenance	Recordkeeping	P	Y	C
1-523.5	Maintain and calibrate monitors	Monitoring	C	Y	C
BAAQMD Regulation 2: Permitting					
2-6-402	District Fees	Reporting	P	Y	C
2-6-409	Certifications, Annual Compliance	Reporting	Annual	Y	C
2-6-502	Semi-Annual Monitoring, Prompt Deviation Reports	Reporting	Semi-annual	Y	C
BAAQMD Regulation 6					
6-1-301	Ringelmann No. 1 Limitation	Monitoring	C	Y	C
6-1-305	Visible Particles	“	C	Y	C
6-1-310	Particle Weight Limitation	“	C	Y	C
6-1-401	Appearance of Emissions	“	C	Y	C

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Applicable	Requirement Citation	Compliance Method	Frequency (P/C/NA)	Compliance (Y/N)	Continuous or Intermittent
BAAQMD Regulation 8, Rule 34 LFG Collection and Control System					
8-34-301	Landfill Gas Collection and Emission				
8-34-301.2	Collection and Control Systems Leak	Field monitoring	Quarterly	Y	C
8-34-301.4	Limits for Other Emission Control Systems	Performance test	Annual	Y	C
8-34-412	Compliance Demonstration Tests	“	Annual	Y	C
8-34-413	Performance Test Report	Recordkeeping	Annual	Y	C
8-34-501 Operating Records					
8-34-501.2	Emission Control System Downtime	Recordkeeping	P	Y	C
8-34-501.4	Required Testing Records	“	P	Y	C
8-34-501.6	Leak Discovery and Repair Records	“	Quarterly	Y	C
8-34-501.10	Gas Flow Rate Records for All Emission	“	C	Y	C
8-34-501.11	Key Emission Control System Operating	“	C	Y	C
8-34-501.12	Maintain Records 5 Years	“	C	Y	C
8-34-503	Landfill Gas Collection and Emission	“	C	Y	C
8-34-504	Portable Hydrocarbon Detector	“	Quarterly	Y	C
8-34-508	Gas Flow Meter	“	P	Y	C
8-34-509	Key Emission Control System Operating	“	C	Y	C
BAAQMD Regulation 9, Rule 1 Inorganic Gaseous Pollutants – Sulfur Dioxide					
9-1-301	Limitations on Ground Level	Monitoring	C	Y	C
9-1-302	General Emission Limitations	“	C	Y	C
Rule 2 Inorganic Gaseous Pollutants – Hydrogen Sulfide					
9-2-301	Limitations on Hydrogen Sulfide	Monitoring	P	Y	C

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Table IV-A: Source Specific Requirements

Sources: S-1, S-2: LFG-Fired Internal Combustion Engines

Applicable Requirement Citation	Compliance Method	Frequency (P/C/NA)	Compliance (Y/N)	Continuous or Intermittent
Rule 8 Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines				
9-8-302 Emission Limits – Waste Derived Fuel Gas				
9-8-302.1	Lean-Burn Engines: NO _x Emission Limit	Performance Test	Y	C
9-8-302.3	CO Emission Limit	“	Y	C
9-8-501	Initial Demonstration of Compliance	“	Y	C
9-8-502	Recordkeeping	Recordkeeping	Y	C
9-8-502.3	Records of Compliance Demonstration Tests	“	Y	C
9-8-503	Demonstration of Engine Compliance	Monitoring	Y	C
40 CFR Part 63 Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (3/9/11)				
63.6585(c)	An area source of HAP emissions is a source that is not a major source.	NA	NA	NA
63.6590	What parts of my plant does this subpart cover?	NA	NA	NA
63.6590(a) (2)	Affected Source - New Stationary RICE	NA	NA	NA
63.6590(a)(2)(iii)	A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.	NA	Y	C

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Table IV-A: Source Specific Requirements

Sources: S-1, S-2: LFG-Fired Internal Combustion Engines

Applicable Requirement Citation	Compliance Method	Frequency (P/C/NA)	Compliance (Y/N)	Continuous or Intermittent	
BAAQMD PTO Cond #23400					
Part 1	Restrictions on Landfill Gas Fuel and TSA Bypass Events < 130 hrs	Recordkeeping	C	Y	C
Part 2	Heat Input: <172,861 mmBTU (HHV) per 12-mo (each engine)	Monitoring/Recordkeeping	C	Y	C
Part 3	CO: <2.1 g/bhp-hr (each engine) <257 ppmv @ 15% O ₂ , dry basis	Monitoring	C	Y	C
Part 4	NO _x < 0.6 g/bhp-hp or <45 ppmv @ 15% O ₂ , dry basis	“	C	Y	C
Part 5	NMOC Limits: 120 ppmv @3% O ₂ dry as methane	Temperature/Test	C	Y	C
Part 6	Temperature Requirements: >927 F, 3-hr average	Monitoring/Recordkeeping	C	Y	C
Part 7	SO _x < 42.6 lb/day per each engine; 8.64 tons per year during any consecutive 12-month period (combined)	Recordkeeping	C	Y	C
Part 7a	TRS: < 600 ppmv in LFG expressed as H ₂ S @ 50% CH ₄ (Individual test or measurement)	Monitoring	P	Y	C
Part 7b	Monthly H ₂ S monitoring and determination of TRS	“	P	Y	C
Part 7c	Requirements to demonstrate compliance with daily and annual SO ₂ limits	Test/Record-keeping	C	Y	C
Part 7d/e	Daily and annual SO ₂ emission calculation requirements	Recordkeeping	P	Y	C
Part 8	Formaldehyde: 1.46 lb/hr Combined (6/9/2015)	Test	P	Y	C
Part 9	Source Testing Requirements and Parameters	Test	P	Y	C

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Table IV-B: Source Specific Requirements

Source #: S-3, A-1: TSA Gas Clean-Up System Abated by TSA Waste Gas Flare

Applicable Requirement Citation		Compliance Method	Frequency (P/C/NA)	Compliance (Y/N)	Continuous or Intermittent
BAAQMD Regulation 1 General Provisions and Definitions		(see above)			
BAAQMD Regulation 8, Rule 34 LFG Collection and Control System		(see above)			
8-34-301.3	LFG Control System Emission Limit	Monitoring	C	Y	C
8-34-412	Compliance Demonstration Tests	Test	Annual	Y	C
8-34-413	Performance Test Report	Reporting	Annual	Y	C
8-34-501 Operating Records					
8-34-501.2	Emission Control System Downtime	Recordkeeping	P	Y	C
8-34-501.3	Continuous Temperature	“	C	Y	C
8-34-501.4	Required Testing Records	“	P	Y	C
8-34-501.6	Leak Discovery and Repair Records	“	Quarterly	Y	C
8-34-501.10	Continuous Gas Flow Records	“	C	Y	C
8-34-501.11	Log of Emission Control System Parameters	“	C	Y	C
8-34-501.12	Maintain records 5 years	“	C	Y	C
8-34-503	Landfill Gas Collection and Emission Control System Leak Testing	Monitoring	Quarterly	Y	C
8-34-504	Portable Hydrocarbon Detector	Monitoring	P	Y	C
8-34-507	Continuous Temperature not less than 1474 °F	Monitoring	C	Y	C
8-34-508	Gas Flow Monitoring	Monitoring	C	Y	C
8-34-509	Monitor Emission Control System Parameters	“	C	Y	C

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Table IV-B: Source Specific Requirements Source #: S-3, A-1: TSA Gas Clean-Up System Abated by TSA Waste Gas Flare

Applicable Requirement Citation		Compliance Method	Frequency (P/C/NA)	Compliance (Y/N)	Continuous or Intermittent
BAAQMD Regulation 9 Rule 1 Inorganic Gaseous Pollutants – Sulfur Dioxide (see above)					
Rule 2 Inorganic Gaseous Pollutants – Hydrogen Sulfide (see above)					
BAAQMD PTO: Cond. No. 23962 (11/25/13)					
Part 1	All waste gas generated from S-3 shall be vented to the flare. Flare shall be operated continuously when gas is vented to it.	Monitoring	C	Y	C
Part 2	Heat Input: <72,270 mmBTU (HHV) per 12-mo	Monitoring/Recordkeeping	C	Y	C
Part 3	NMOC Limits 30 ppmv @ 3% O2 dry, as methane	Test/ Parametric Monitoring	C	Y	C
Part 4	Temperature Requirement: Operate at 1474 F (3-hr av) or higher	Monitoring/Recordkeeping	C	Y	C
Part 5	NOx < 0.06 lbs. per million BTU of heat input, or <15 ppmv @ 15% O2, dry basis	Testing/Recordkeeping	C/Annual	Y	C
Part 6	CO: <0.20 lbs. of CO per million BTU of heat input, or <35 ppmv @ 15% O2, dry basis	Testing/Recordkeeping	C/Annual	Y	C
Part 7	SOx < 13.9 lb/hr, combined plant emissions < 20.9 ton / 12-mo; raw LFG < 300 ppmv TRS	Testing/Recordkeeping	C / Monthly	Y	C
Part 8	Formaldehyde: < 1.0E-3 pounds per hour	Testing	Annual	Y	C
Part 9	Toxic Air Contaminants limits for inlet gas	Testing	Annual	Y	C
Part 10	Equip with alarms and automatic combustion air control, gas shutoff valves, and start/restart system		NA	Y	C
Part 11/12	Annual compliance demonstration Source Test requirements; inlet gas analysis	Testing/Reporting	Annual	Y	C