

PUBLIC COMMENTS

August 28, 2007 Public Hearing - – Santa Barbara

August 29, 2007 Public Hearing- – Santa Maria

Letters Received as of December 19, 2007

NEW RULE 361 and PROPOSED AMENDED RULE 202

| # | Comment from: | Comment |
|----|------------------------------|---|
| 1 | UCSB EH&S – Ali Aghayan | Why is tuning required 2 times per year? |
| 2 | VAFB – John Gilliland | Why not delay the CAC until October? |
| 3 | VAFB – John Gilliland | Section J.4.f. – One cannot always get a 30 minute test run. Any flexibility here? Sometimes cannot dump heat. |
| 4 | UCSB EH&S – Ali Aghayan | Will the cost of permitting be like that of larger boilers? |
| 5 | UCSB Housing – Mark Rousseau | What is the added emission reduction? |
| 6 | So Cal Gas – Jim Fox | We don't have to apply for permits until 2016? |
| 7 | WSPA - Kevin Wright | What requirements will be in the permit when Rule 202 exemption goes away? |
| 8 | WSPA - Kevin Wright | Regarding the tuning procedure. What are the compliance implications? What if you find you are out of compliance? |
| 9 | VAFB – John Gilliland | Section K.1. Do we have the list of APCD approved analyzers? |
| 10 | VAFB – John Gilliland | Section I.3. Boiler tuning. 24 hours per year is annual? |
| 11 | VAFB – John Gilliland | When will the staff report be available? |
| 12 | VAFB – John Gilliland | What is a smoke spot test? |
| 13 | VAFB - John Gilliland | What about units that don't use utility natural gas? |

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| 14 | So Cal Gas – Jim Fox | Unsure of what will be required of existing units. |
| 15 | UCSB Housing – Mark Rousseau | Are facilities required to install fuel meter now? |
| 16 | Venoco - Laura Kranzler | Is there a compliance schedule available? |
| 17 | Greka – Al Wedderburn | Can units be retrofitted as opposed to be replaced to meet the rule requirements? |
| 18 | ULA (at VAFB) – Rhonda Cardinal | What is the compliance schedule? |
| 19 | ULA (at VAFB) – Rhonda Cardinal | What will be in the permit? Content, requirements? |
| 20 | Greka – Al Wedderburn | What about cogen units? |
| 21 | Greka – Ramzi Chaabune | What about the replacement of old units with a new rule in progress? What happens with NEI? |
| 22 | Greka – Ramzi Chaabune | We have an ATC into the APCD for non-installed units (totaling 4.5 MM Btu). Is the unit subject to Rule 361? |
| 23 | VAFB – Kim Harding | What about units that have been purchased but not installed? We have several boilers in this size range in our warehouse(s). |
| 24 | Greka – Al Wedderburn | Can EPA require stricter requirements? |
| 25 | VAFB – Kim Harding | Are fuel meters required for Section D.1 units? |
| 26 | ULA (at VAFB) – Rhonda Cardinal | What conditions will be in the PTO? |
| 27 | VAFB – Dave Savinsky | How did we come up with the number 20 for Section J.1 (multiple units eligible for an alternative source test schedule for up to one half of the units every other year)? |
| 28 | Entrix – Kevin Wright | Question regarding stacking of units. |
| 29 | Greka – Ramzi Chaabane | Greka has 2 ATCs for external combustion units but the units have not been installed yet. If they are installed after Rule adoption would emission limits apply to them or would they be considered existing units? |

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| 30 | Greka – Ramzi Chaabane | If an application is submitted but an ATC has not been received yet would the unit be considered new or existing? |
| 31 | Greka – Ramzi Chaabane | If a permitted unit is moved within a stationary source would it still be considered an existing unit? |
| 32 | ULA (at VAFB) – Harley Santos | Make it clear that existing units must apply for a Permit to Operate upon rule adoption. |
| 33 | ULA (at VAFB) – Harley Santos | Add additional compliance dates to Sections G through J. |
| 34 | VAFB – Dave Savinsky | Provide details regarding the permit conditions that will accompany SBCAPCD-issued Permits to Operate for existing units |
| 35 | VAFB – Dave Savinsky | At the 5 September 2007 meeting between VAFB and SBCAPCD, SBCAPCD stated that existing units or new units are not required to install fuel meters. Because the units are not metered, the emissions limits would be the potential to emit emissions |
| 36 | VAFB – Dave Savinsky | Rule 361 defines a modified unit to mean any unit that has a burner or burners replaced or where the unit is replaced in its entirety on or after the rule adoption date. Modified units are considered new units. VAFB does not consider replacement of electrical systems, refractory linings, fasteners used to secure the burners, and other non-burner related parts to be a modification for the purposes of this rule. |
| 37 | VAFB – Dave Savinsky | VAFB requests the SBCAPCD revise the Rule 361 12-month compliance requirement to be 18 months. |
| 38 | VAFB – Dave Savinsky | VAFB requests the SBCAPCD remove the temperature and pressure corrected portion and revise the fuel meter requirement. |
| 39 | VAFB – Dave Savinsky | Rule 361 requires records be maintained for a period of five years. Revise to three years. |
| 40 | VAFB – Dave Savinsky | VAFB requests the remove all annual reporting requirements. Sources test reports are already required to be submitted to the District and VAFB is routinely inspected by the SBCAPCD. These records will be maintained by the applicable operator and made available upon request. |
| 41 | VAFB – Dave Savinsky | Rule 361 provides flexibility on a source test schedule for facilities with more than 20 boilers. VAFB requests the SBCAPCD lower this to ten (10) boilers. Source testing up to ten boilers in one year is challenging. Additionally, VAFB already is subject to other SBCAPCD rule and permit-required source testing schedules. Lowering the boiler total to ten provides VAFB operational flexibility to ensure rule compliance |
| 42 | VAFB – Dave Savinsky | Rule 361 requires “At a minimum, three 30 minute test runs be performed for compliance with Sections J.4.a and J.4.b”. VAFB requests the SBCAPCD revise to verbiage to state: “When operationally feasible, three 30 minute test runs shall be performed for compliance with Sections J.4.a and J.4.b.” |

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| 43 | VAFB – Dave Savinsky | At the 28 August 2007 workshop, the SBCAPCD confirmed that the stack gas smoke-spot numbers are required for fuel oil-fired units only and is not required for natural gas-fired or liquefied natural gas-fired units |
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| 44 | VAFB – Dave Savinsky | VAFB requests the SBCAPCD remove the tune-up report requirement identified in Procedures A and B. |
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Questions 1 – 16: APCD Workshop August 28, 2007
 Questions 17 – 27: APCD Workshop August 29, 2007
 Question 28: Entrix E-Mail September 6, 2007
 Questions 29-31: Greka E-Mail September 4, 2007
 Questions 32-33: ULA letter September 19, 2007
 Questions 34-44: VAFB letter September 13, 2007