apcd air pollution control district
SANTA BARBARA COUNTY

September 29, 2022

Via Email
Read Receipt Requested

Edward Fetterman
E & B Natural Resources
P.O. Box 179
New Cuyama, CA 93254

Re: Conditional Approval of 2018 Air Toxics Emission Inventory Plan for E & B
Air Toxics "Hot Spots" Information and Assessment Act (AB 2588)

Dear Edward Fetterman:

The Santa Barbara County Air Pollution Control District (District) has reviewed your revised Air Toxics Emission Inventory Plan (ATEIP) for inventory year 2018 dated August 2022. Based on our review of this plan, the District *conditionally approves* the revised ATEIP subject to changes noted in the attachment to this letter.

Please submit a final ATEIP, response letter and Air Toxics Emission Inventory Report (ATEIR) by April 3, 2023. Include a response letter with a response to each Conditional Approval item in the attachment. In addition, for ease of review, please submit a Track Changes version of the final ATEIP that shows all changes from the revised submittal dated August 2022. See Section 3 of the District's *Guidelines for Preparing Air Toxics Emission Inventory Plans and Reports* (https://www.ourair.org/wp-content/uploads/Guidelines-for-Preparing-ATEIPs-and-ATEIRs-in-Santa-Barbara-County.pdf) for a complete list of requirements for the ATEIR. Electronic copies of the final ATEIP, ATEIR and response letter should be sent via email to MountainC@sbcapcd.org.

If you have any questions or require additional information, please contact me at (805) 979-8314 or MountainC@sbcapcd.org.

Sincerely,

Charlotte Mountain, Air Quality Engineer III
Engineering Division

cc: South Cuyama Unit (SCU) 01074 Project File
South Cuyama Unit (SCU) 01074 Toxics File
Carly Miser, EnviroTech Consultants, Inc.
Scott Faulkenburg, EnviroTech Consultants, Inc.
Toxics Group
Engr Chron File

Attachment: E & B 2018 ATEIP Conditional Approval Items

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ATTACHMENT

E & B 2018 ATEIP Conditional Approval Items

1. Equation 10: Equation 10 for the annual emissions from well workovers includes a multiplication by 453.6 g/lb. Revise the equation to divide by 453.6 g/lb.

2. Well Workovers: Update Section 3.3.4 of the ATEIP to state that the annual hour use data for the well workovers will come from the 2018 work orders.

3. Attachment C-2: The following comments refer to the emission factors for natural gas-fired internal combustion engines presented in Attachment C-2 of the ATEIP.

    a. Some of the emission factors were corrected in response to comment no. 3 of the District's June 23, 2022 letter; however, the profiles shown in Attachment C-2 still do not match the District's spreadsheet *SBCAPCD-Approved TAC Emission Factors.xlsx*, dated August 2021. The approved emission factors are reproduced below; please update Attachment C-2 accordingly. In addition, revise the date in the header to read "Santa Barbara County Approved Emission Factors – August 2021".

Pollutant	4 Stroke-Rich Burn Emission Factor (lb/MMcf)	4 Stroke-Lean Burn Emission Factor (lb/MMcf)
Acenaphthene	—	0.00128
Acenaphthylene	—	0.00564
Acetaldehyde	2.85	8.53
Acrolein	2.68	5.24
Ammonia	18	18
Benzene	1.61	0.449
Benzo(b)fluoranthene	—	0.000169
Benzo(e)pyrene	—	0.000423
Benzo(g,h,i)perylene	—	0.000422
1,3-Butadiene	0.676	0.272
Carbon Tetrachloride	0.0181	0.0374
Chloroform	0.014	0.0291
Chrysene	—	0.000707
1,2-Dichloropropane	0.0133	0.0274
1,3-Dichloropropene	0.013	0.0269
Ethyl Benzene	0.0253	0.0405
Ethylene Dibromide	0.0217	0.0452
Ethylene Dichloride	0.0115	0.0241
Fluoranthene	—	0.00113
Fluorene	—	0.00578
Formaldehyde	20.9	53.9
n-Hexane	—	1.13
Methanol	3.12	2.55
Methylene Chloride	0.042	0.0204
2-Methylnaphthalene	—	0.0339
Naphthalene	0.099	0.0759
PAHs (excl. naphthalene)	0.14382	—
Phenanthrene	—	0.0106
Pyrene	—	0.00139

Pollutant	4 Stroke-Rich Burn Emission Factor (lb/MMcf)	4 Stroke-Lean Burn Emission Factor (lb/MMcf)
Styrene	0.0121	0.0241
1,1,2,2-Tetrachloroethane	0.0258	0.0408
Toluene	0.569	0.416
1,1,2-Trichloroethane	0.0156	0.0324
1,2,4-Trimethylbenzene	—	0.0146
Vinyl Chloride	0.00732	0.0152
Xylenes	0.199	0.188

b. Note that the presented ammonia emission factor of 18 lb/MMcf is for engines equipped with SNCR. In the ATEIR, any engines with SCR should use 9.1 lb/MMcf, and engines without SNCR or SCR should use 3.2 lb/MMcf, per Table B-1 of South Coast AQMD's *Reporting Procedures for AB2588 Facilities for Reporting their Quadrennial Air Toxics Emissions Inventory*.

4. Machader Wastewater Tank: Based on the response to comment no. 5 of the District's June 23, 2022 letter, the Machader Wastewater Tank (Device ID 000875) must be included in the ATEIP. Add this device to Section 3.4.2 of the ATEIP, the *Source Parameters Table*, the *Device Operation Schedule Table*, and the *TAC Device Table*. Furthermore, add this tank to the *Building Parameters Table*.

5. Tank Exit Temperatures: Change the exit temperatures for the tanks (Source IDs SCUT01 through SCUT15) back to 0 K (i.e., ambient temperature).

6. CLPGP10 Source Parameters:

   a. A release height of 0 m is not appropriate for this source. Based on the submitted sigma Z of 4.25 m, the release height should be 4.569 m.

   b. Change the emission rate to 1 g/s.

7. CLPICE Sigma Z: As stated in comment no. 10.d of the District's June 23, 2022 letter, the sigma Z parameter is typically omitted for these types of sources. As no justification was provided for the submitted value, delete the sigma Z parameter for source ID CLPICE.

8. MVFF Stack Diameter: Per Form-25T, change the stack diameter for the loading and breathing sources (Source IDs MVFF1 and MVFF2) to 0.0508 m.

9. AREA1 Emission Rate: Change the emission rate to 0.0029674 g/s/m^2 (i.e., 1 g/s ÷ (17.69m*19.05m)).

10. VOL1 and VOL2 Sigma Z: Based on the submitted release height of 4 m, the total vertical dimension of the source is 8 m. Therefore, change the sigma Z to 3.72 m (i.e., 8 m divided by 2.15, per Section 3.4.4 of Form-15i).

11. Workover Source Parameters: The diesel engines used for well workover activities are most appropriately modeled as POINT sources. In the absence of engine-specific stack parameter data, the default stack parameters shown in Appendix D of Form-15i may be used. Update the ATEIP accordingly.

12. Onsite Receptors: Per Carly Miser's email on September 28, 2022, onsite receptors should be added to Aliso Canyon Rd and Foothill Rd inside the northwest area of the property. Update Section 6.4 of the ATEIP to state that onsite receptors will be included on these roads at a spacing no larger than 25 meters. Submit a Lakes-compatible CSV file containing these onsite receptors. Furthermore, revise cell D32 of the *AERMOD Options Table* to state that onsite receptors are present.