

**Subject:** RE: Next Green Wave - Coalinga

**Date:** Thursday, September 12, 2019 at 2:45:12 PM Pacific Daylight Time

**From:** Jesse Garcia

**To:** Todd Hybels

Yes. See my correction below.

**Jesse A. Garcia, P.E.**  
**Air Quality Engineer**  
**San Joaquin Valley APCD**

**From:** Todd Hybels <thybels@nextgreenwave.com>

**Sent:** Thursday, September 12, 2019 2:44 PM

**To:** Jesse Garcia <Jesse.Garcia@valleyair.org>

**Subject:** Re: Next Green Wave - Coalinga

Did you mean to say if the engine is needed longer than 60 days?

**From:** Jesse Garcia <[Jesse.Garcia@valleyair.org](mailto:Jesse.Garcia@valleyair.org)>

**Date:** Thursday, September 12, 2019 at 2:41 PM

**To:** Todd Hybels <[thybels@nextgreenwave.com](mailto:thybels@nextgreenwave.com)>

**Subject:** RE: Next Green Wave - Coalinga

If the engine is registered as required in Section 6.16 of Rule 2020, it may be used for up to 60 days. If the engine is needed for longer than **60** days, then permitting would be required for such an engine. The most stringent requirement would be if Best Available Control Technology (BACT) is triggered.

BACT is triggered when the potential emissions are greater than 2 lbs/day (except for CO). Therefore, if emissions are kept below 2 lb/day, BACT would not be triggered. If a Tier4 Certified engine was used instead of the Tier 3, the potential emissions based on 18 hours/day of operation is as follows:

Post Project Emissions (PE2)				
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Daily PE2 (lb/day)
NO <sub>x</sub>	0.29	174	18	2.0
SO <sub>x</sub>	0.0051	174	18	0.0
PM <sub>10</sub>	0.01	174	18	0.1
CO	3.7	174	18	25.5
VOC	0.14	174	18	1.0

As seen above, with this 174 bhp Tier 4 Certified IC engine, BACT would not be triggered. Using a Tier 4 Certified engine may be an option for long term use greater than 60 days.

Let me know if you have any questions or need further clarification.

Also, can you provide me with information on what kind of extractor the facility uses and what types of solvent are used?

Thanks,

**Jesse A. Garcia, P.E.**  
**Air Quality Engineer**  
**San Joaquin Valley APCD**

**From:** Todd Hybels <[thybels@nextgreenwave.com](mailto:thybels@nextgreenwave.com)>  
**Sent:** Thursday, September 12, 2019 1:48 PM  
**To:** Jesse Garcia <[Jesse.Garcia@valleyair.org](mailto:Jesse.Garcia@valleyair.org)>  
**Subject:** Next Green Wave - Coalinga

Jesse,

Thanks for your time on the phone today. I currently believe that this temporary generator proposed for 1275 W. Elm Ave complies with the conditions of the District's portable emissions unit exemption that can be found in District Rule 2020, specifically Section 6.16.

I appreciate your help and agreement on this issue. If the temporary generator is needed for longer than 60 days, NGW will apply for a permit as this exemption is only good for 60 days.

Thanks,  
Todd Hybels  
312-307-5289