

Gaffney, Patrick@ARB

From: Gaffney, Patrick@ARB
Sent: Monday, August 20, 2018 11:31 AM
To: Gaffney, Patrick@ARB
Subject: Flores - Regulation Comments

From: Ricardo Flores <rfloros@associatesenvironmental.com>
Sent: Friday, August 17, 2018 4:49 PM
To: Gaffney, Patrick@ARB <Patrick.Gaffney@arb.ca.gov>
Subject: DRAFT Regulation

Hi Patrick

I have the following suggestions to the preliminary regulation

- Section 93404(a)(5)(E) – This should read: **Release location exit temperature, if applicable.** I’m guessing you want this information for potentially performing some modeling. Fugitive sources typically modeled as volume or area sources will not require an exit temperature.
- Section 93404(a)(5)(F)(1.) – This should read: **Is stack circular or rectangular/square. Release location stack dimensions in feet.** Or you could just ask for equivalent stack diameter in feet for non-circular stacks.
- Section 93404(a)(5)(F) – Does ARB want to know if the stack has a rain cap or if it’s in the horizontal direction?
- Section 93404(a)(5)(F) – How do we address situations where we have stacks that vent in a building and are ultimately released via a monitor (roof vent) at the apex of the building
- Section 93404(a)(8)(D) – I suspect this meant to read: **For each criteria air pollutant and toxic air contaminant emitted by a process at the facility:**
- Section 93404(a)(8)(D)(4) – Is ARB only interested in annual emissions? If so, then this should read: **Actual annual emissions**
- Section 93404(c) – Can a source test that hasn’t been formally evaluated/approved by the local air district be used to estimate emissions (best available data)?

Let me know if you have any questions.

Thanks

Riccardo Flores
Associates Environmental