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Sent: Wednesday, June 13, 2018 8:51 AM

To: Marc Cooley <MCooley@airquality.org>

Cc: Mike Kelley <Mike.Kelley@hcmuddox.com>; Conrad James <Conrad.James@basalite.com>; terry.Stepanski@fivesgroup.com

Subject: Comments regarding Rule 419.

Good Morning Marc.

Thank you for the opportunity to comment on the proposed rule 419. As previously disclosed, it is difficult to make any specific statements until we undertake benchmark testing of HC Muddox's kiln. Because of the short notice, and the need to investigate NOx and CO concentrations at different points in the pre-heat, fire and ware cool zones, a standard stack test will not be sufficient. We should know today when our burner supplier will conduct these tests, though we expect it will not be before the 22nd of June. We will keep you informed of progress. Until this time, general comments are..

1. The AB 2588 list shows the Kiefer Landfill to be the District's largest NOx emitter. It is likely that if the currently flared landfill gas was able to be delivered into the natural gas pipeline network it would result in greatly reduced NOx emissions. It does not appear that any SVAPCD rules encourage landfill gas to pipeline injection.
2. Ventura County APCD's Rule 74.34 identifies kilns as requiring bespoke emissions standards because of their unique design, materials and production processes. I would encourage the SVAPCD to consider the incorporation of similar limits if required. Based on ARB emissions data, HCM is not a Major Source, or a top ten NOx emitter.

Marc, I will keep you up to date with our kiln testing.

Regards

Greg

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