

SCAP

SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS



March 24, 2022

Sent via email to: Al Baez abaez@aqmd.gov
BACT Program Supervisor
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: LAER/BACT Determination Proposed New Listing 11 I.C. Engine-Compression Ignition \geq 1,000 BHP, Stationary Emergency

Dear Mr. Baez:

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates the opportunity to comment on the proposed LAER/BACT determination for compression ignition stationary emergency generators over 1,000 BHP.

SCAP represents over 80 public water/wastewater agencies in Southern California. SCAP members provide essential water supply and wastewater treatment for approximately 20 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino, and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastewater into resources for beneficial uses such as recycled water and renewable energy.

SCAP members rely on compression ignition emergency generators to maintain essential public wastewater conveyance and treatment during power outages. These generators must start and provide power within seconds of a power outage. Our responsibility to the public and water quality related permits have zero allowance for power outages. We must always protect public health and the environment from sewer overflows and comply with water quality permit conditions regardless of the status of grid power.

As discussed during the February 23, 2022 BACT SRC meeting, our members are troubled that EPA certified final Tier 4 generators include an inducement feature to derate and shutdown, if any one of a variety of sensors detects an anomaly with operating parameters. Once a generator is shutdown, it cannot be restarted until a factory service representative physically resets the inducement feature. This process could take hours or days depending on the service representative's availability. This is an untenable scenario for wastewater conveyance and treatment essential for protecting public health and the environment.

We understand that SCAQMD would allow compliant final Tier 4 generators to be used if source testing requirements are included in the stationary source permit. While we appreciate this option,

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the required source testing would likely exceed maintenance and testing limitations as contained in SCAQMD Rule 1470. We believe such source testing requirements would be duplicative of testing performed by manufacturers for the same certified generators and would needlessly increase emissions. The proposed LAER/BACT determination should provide for a viable compliance pathway moving forward without being required to install emergency generators with inducement features that will severely undermine our ability to provide a reliable essential public service.

While we understand that LAER/BACT determinations are not required to address permitting nuances, we believe this is a unique situation that must be resolved prior to the adoption of this LAER/BACT determination. We respectfully request that compliant source testing options be identified, such that compliant final Tier 4 generators can be used by essential public services, before the proposed LAER/BACT determination is adopted by SCAQMD.

If there are any questions regarding these comments, please contact me directly at (760) 415-4332 or sjepson@scap1.org

Sincerely,

Steve Jepsen

Executive Director - SCAP

cc: Jason Aspell (SCAQMD)
Bhaskar Chandan (SCAQMD)
SCAP Air Quality Committee