

Faye Thomas

From: Clerk of Board
Sent: Tuesday, November 19, 2024 1:00 PM
Subject: RE: Request for consent calendar: Snow Summit, Case No 4657-3

This matter has been approved by the Board for the Consent Calendar.

From: Mohan Balagopalan <mbalagopalan@aqmd.gov>
Sent: Friday, November 15, 2024 5:26 PM
To: Clerk of Board <ClerkofBoard@aqmd.gov>
Subject: Re: Request for consent calendar: Snow Summit, Case No 4657-3

Hi,
Thanks for the responses to my questions. Based on the responses, I have no issues with this case to be heard on Consent Calendar. Thanks.

Mohan Balagopalan

From: Clerk of Board <ClerkofBoard@aqmd.gov>
Sent: Friday, November 15, 2024 5:02 PM
To: Mohan Balagopalan <mbalagopalan@aqmd.gov>
Subject: FW: Request for consent calendar: Snow Summit, Case No 4657-3

From: Grasse, Maya <Maya.Grasse@alston.com>
Sent: Friday, November 15, 2024 4:57 PM
To: Clerk of Board <ClerkofBoard@aqmd.gov>
Cc: Ryan Mansell <rmansell@aqmd.gov>
Subject: [EXTERNAL] RE: Request for consent calendar: Snow Summit, Case No 4657-3

Dear Madam Clerk:

Below is the joint response from the District and the Petitioner to Board Member Balagopalan's questions:

What was these engines' usage (hours operated) before the Rule 1100 adoption/amendment with the low usage limit of 500 hours? The reason for the question is whether there will be any exceedance of the NAAQS (State and Federal) for NOx and PM 10, 2.5 with these requested increases in hours of operation (Rule 1303 (b)(1), Appendix A, Table A-2).

Below is the operating hour data from Snow Summit for the preceding 5 years (before the 500-hour limit for Low-Use Engines became effective in 2024):

Snow Summit SOKO and MCH Engine Hours of Usage					
Device ID	Equipment Description	2023 Usage	2022 Usage	2021 Usage	2020 Usage
D69	Internal Combustion Engine No. 9 (G-1)	507	700	515	661
D70	Internal Combustion Engine No. 10 (G-2)	383	611	502	624
D75	Internal Combustion Engine No. 11 (G-3)	617	607	522	652
D78	Internal Combustion Engine No. 12 (G-4)	547	645	559	446
D79	Internal Combustion Engine No. 13 (G-5)	564	721	607	702
D80	Internal Combustion Engine No. 14 (G-6)	574	759	584	651

Prior to the 2019 amended rule 1100, the engines' limit was 2,190 hours. The operating hours vary somewhat, depending on weather conditions, natural snow fall, and ambient temperatures. Drier years required more snowmaking. And snowmaking is only used to supplement natural snow fall since the cost to operate snow making equipment is quite expensive. Rule 1100's 500-hour limit went into effect this year, in 2024. Snow Summit believed, at the time of rulemaking in 2019, that its Electrification Project would be up and running in time to reduce engine use. Unfortunately, the National Weather Service is calling for a drier-than-normal winter for the 2024-25 season, hence the request for an additional 300 hours per engine. The Electrification Project, when it comes online, means the engines will be reduced to backup capacity and remaining below 500 hours annually should not be an issue.

Since there is no air monitoring station in the Big Bear area, is the Crestline station representative of these mountain areas?

Yes, Crestline is representative of these mountain areas.

Should there be a condition to not exceed the NAAQS for NOx and PM 10/2.5? If so, how will this be verified?

No, a condition to this effect is not warranted and would impose significant burdens, including modeling. We don't see that there would be any NAAQS exceedance as a result of the variance if 300 hours are granted. These engines already went through NSR when they were permitted. They were originally permitted for 2,190 hours, and recently have been operating in the ranges above. Rule 1100 is not part of the SIP, nor are post-2008 amendments to Rule 1110.2.

Regards,
Maya

From: Clerk of Board <ClerkofBoard@aqmd.gov>
Sent: Friday, November 15, 2024 8:35 AM
To: Grasse, Maya <Maya.Grasse@alston.com>
Cc: Ryan Mansell <rmansell@aqmd.gov>
Subject: FW: Request for consent calendar: Snow Summit, Case No 4657-3

EXTERNAL SENDER – Proceed with caution

From: Mohan Balagopalan
Sent: Friday, November 15, 2024 8:00 AM
To: Clerk of Board <ClerkofBoard@aqmd.gov>
Subject: Re: Request for consent calendar: Snow Summit, Case No 4657-3

Hi,
What was these engines' usage (hours operated) before the Rule 1100 adoption/amendment with the low usage limit of 500 hours? The reason for the question is whether there will be any exceedance of the NAAQS (State and Federal) for NOx and PM 10, 2.5 with these requested increases in hours of operation (Rule 1303 (b)(1), Appendix A, Table A-2). Since there is no air monitoring station in the Big Bear area, is the Crestline station representative of these mountain areas?

Should there be a condition to not exceed the NAAQS for NOx and PM 10/2.5? If so, how will this be verified?

Thanks.

Mohan Balagopalan

From: Clerk of Board <ClerkofBoard@aqmd.gov>
Sent: Thursday, November 14, 2024 1:08 PM
Subject: FW: Request for consent calendar: Snow Summit, Case No 4657-3

Please review the attached documents and advise ASAP, if you support having the matter heard on the Consent Calendar. This matter is scheduled for a short variance hearing on Wednesday, November 20, 2024.

From: Grasse, Maya <Maya.Grasse@alston.com>
Sent: Thursday, November 14, 2024 1:00 PM
To: Clerk of Board <ClerkofBoard@aqmd.gov>
Cc: Clerk of Board <Front_PC@aqmd.gov>; Camacho, Dana <Dana.Camacho@alston.com>; Ryan Mansell <rmansell@aqmd.gov>
Subject: [EXTERNAL] Request for consent calendar: Snow Summit, Case No 4657-3

Dear Madam Clerk:

The parties request that the Snow Summit's Petition for Short Variance matter, Case No. 4657-3, be placed on the consent calendar. Please accept the attached documents for filing:

- Stipulation signed by counsel for the District and for Snow Summit;
- Declaration of Mr. Wade Reeser;
- Declaration of Mr. John Furlong; and
- Proposed Findings and Order in PDF and Word

Thank you,

Maya

Maya Lopez Grasse | Alston & Bird LLP
Counsel | Environment, Land Use and Natural Resources

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