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8 **SNOW SUMMIT, LLC**

9 **BEFORE THE HEARING BOARD OF THE**

10 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

11 In the Matter of

12 **SNOW SUMMIT, LLC**

13 Petitioner.

Case No.: 4657-3

Facility I.D.: 185352

14 **DECLARATION OF JOHN FURLONG**
15 **IN SUPPORT OF PETITION FOR**
16 **SHORT VARIANCE**

17 1. My name is John Furlon, and I am a Principal Scientist at Yorke Engineering,
18 LLC (“Yorke”), a technical consulting company that has been assisting Petitioner Snow
19 Summit, LLC (“Snow Summit”) in connection with South Coast Air Quality Management
20 District (“District”) permitting and compliance at Snow Summit’s ski resort, a RECLAIM and
21 Title V facility located at 880 Summit Boulevard, Big Bear Lake City, California. I have been
22 employed at Yorke for 11 years. I have personal knowledge of the facts stated herein and, if
23 called as a witness, could and would testify competently thereto under oath.

24 2. I am familiar with Snow Summit’s Petition for Short Variance filed with District
25 on October 28, 2024 (“Petition”), including the Snow Summit’s Title V permit and the District
26 Rules involved in the Petition.

27 3. This declaration provides additional technical information regarding the
28 equipment that is the subject of the Petition. This declaration also provides technical
information regarding the calculation of excess emissions.

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EQUIPMENT SUBJECT TO THE VARIANCE

4. As explained in the Declaration of Wade Reeser (“Reeser Declaration”), the six engines that are the subject of the Petition drive electrical generators used to power Snow Summit snowmaking equipment. The six engines, as they are described in the Snow Summit’s Title V permit, are as follows:

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.
INTERNAL COMBUSTION ENGINE, LEAN BURN, NON-EMERGENCY, G-1, DIESEL FUEL, CUMMINS, MODEL QSK78-G6, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP	A/N 629605	D69
INTERNAL COMBUSTION ENGINE, LEAN BURN, NON-EMERGENCY, G-2, DIESEL FUEL, CUMMINS, MODEL QSK78-G6, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP	A/N 629659	D70
INTERNAL COMBUSTION ENGINE, LEAN BURN, NON-EMERGENCY, G-3, DIESEL FUEL, CUMMINS, MODEL QSK78-G6, 18 CYLINDERS, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP	A/N 629634	D75
INTERNAL COMBUSTION ENGINE, LEAN BURN, NON-EMERGENCY, G-4, DIESEL FUEL, CUMMINS, MODEL QSK78-G6, 18 CYLINDERS, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP	A/N 629635	D78
INTERNAL COMBUSTION ENGINE, LEAN BURN, NON-EMERGENCY, G-5, DIESEL FUEL, CUMMINS, MODEL QSK78-G6, 18 CYLINDERS, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP	A/N 629636	D79
INTERNAL COMBUSTION ENGINE, LEAN BURN, NON-EMERGENCY, G-6, DIESEL FUEL, CUMMINS, MODEL QSK78-G6, 18 CYLINDERS, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP	A/N 629637	D80

Attachment A

Excess Emission Calculations

Snow Summit, LLC

Facility ID 185352

Case No 4657-3, Duration of Variance: 50 Days (11/20-12/31/24)

Note: Total excess emissions are calculated using worse case scenrio of 24 hours of operation each day. 6 engines listed in petition for variance are identical.

Pollutant	Emission Factors taken from permit standard (g/BHP-hr)	Emission Rate (lb/hr)	Hours per Day	Excess Emissions/Engine (lbs/day)	Excess Emissions for 6 Identical Engines (lbs/day)	Excess Emissions for all engines (tons/day)	Variance Duration (days)	Total Excess Emisisions (tons)	Cost Per ton from Rule 303	Fees
CO	0.448	3.01	24	72.1	433	0.216	50	10.8	\$ 74.88	\$ 810.19
PM	0.01	0.07	24	1.6	10	0.005	50	0.2	\$ 5,351.66	\$ 1,292.50
PM10	0.045	0.30	24	7.2	43	0.022	50	1.1	N/A	N/A
NOx ^a	0.9	6.04	24	144.9	869	0.435	50	21.7	\$ 4,589.18	\$ 99,751.30
SOx ^b	0.0049	0.03	24	0.8	5	0.002	50	0.1	\$ 5,351.66	\$ 633.32
VOC ^c	3.75 lbs/1000 gal	0.57	24	13.7	82	0.041	50	2.1	\$ 7,649.65	\$ 15,712.57
Total Fees									\$ 118,199.88	

^aRECLAIM conversion factor of 0.018 used to convert NOx permitted limit of 50 ppmv to g/bhp-hr

^bEmission Factor is from conversion of 15 ppm sulfur content

^cAssuming 5 gal/hr of fuel usage for every 100 BHP

Operational Parameters and Constants	
BHP Rating	3,043
Conversion Factor (g/lb)	453.59
Conversion Factor (lb/ton)	2,000