

ORIGINAL

SOUTH COAST AQMD  
CLERK OF THE BOARDS

2024 OCT 29 PM 3: 23

PETITION FOR VARIANCE  
BEFORE THE HEARING BOARD OF THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SV  
11/20/24

PETITIONER: Snow Summit, LLC

CASE NO: 4657-3

FACILITY ID: 185352

FACILITY ADDRESS: 880 Summit Blvd  
*[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]*

City, State, Zip: Big Bear Lake, CA, 92315

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

INTERIM  SHORT  REGULAR  EMERGENCY  EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

<u></u>	<u>Maya Lopez Grasse</u>
<u></u>	<u>Counsel</u>
<u></u>	<u>Alston &amp; Bird LLP</u>
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<u>Zip</u>	<u>Los Angeles, CA Zip 90071</u>
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<u>E-mail</u>	<u>E-mail Maya.Grasse@Alston.com</u>

3. RECLAIM Permit  Yes  No Title V Permit  Yes  No

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

N/A

5. Briefly describe the type of business and processes at your facility.

Snow Summit, LLC is a ski resort that operates in the City of Big Bear Lake, California. Since its founding in 1952, Snow Summit has been Southern California's most dependable ski area, averaging approximately 150 days of operations and approximately 500,000-600,000 visitors during a typical winter. As the largest employer in the Big Bear Valley, the resort is a primary driver of economic success in the region, with an average visitor spend of \$142 for each ski resort visit and a net-positive ancillary impact on multiple non-resort businesses, including local lodging operators, retailers, and dining establishments.

Due to the variability of Southern California winters, Snow Summit relies on an extensive snowmaking system to supplement natural snowfall deficiencies and cover its 240 acres of skiable terrain throughout the season – conditions permitting – to ensure consistent snow conditions for visitors, along with reliable employment for the approximately 1,000 winter season employees.

The lifeblood of Snow Summit's operation are its snowmaking abilities, and the six internal combustion engines that are the subject of this variance petition are the heart of that operation. The engines are used to drive electrical generators, and the electricity that is produced is then used to power water pumps and air compressors for the snow making operations.

Unlike most other ski resorts with snow making operations, the local electric utility, Bear Valley Electric, did not have sufficient electric generating resources to provide Snow Summit with the necessary power for snow making operations when the snow making operations were developed several decades ago. As such, Snow Summit installed their own electrical generating equipment and the six engines have been operating on a seasonal basis since then.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
INTERNAL COMBUSTION ENGINE, LEAN BURN, NON-EMERGENCY,	A/N 629605	D69	N/A

G-1, DIESEL FUEL, CUMMINS. MODEL QSK78-G6, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP			
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	N/A
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	N/A
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	N/A
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	N/A
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	N/A

\*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The six internal combustion engines that are the subject of this variance petition are used to drive electrical generators. The electricity that is produced is then used to power water pumps and air compressors for snow making operations. Snow making operations are a critical component of ski resort operations because reliable natural snow fall, especially in November and December is inconsistent. Without snow making operations, ski resort operations could be jeopardized because of a lack of natural snow fall, especially during the Christmas-New Year holiday season.

\_\_\_\_\_

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes  No

If yes, how often: \_\_\_\_\_ Date of last maintenance and/or inspection \_\_\_\_\_

Describe the maintenance and/or inspection that was performed.

Maintenance of the six engines is regularly conducted in accordance with the manufacturer's recommendation and permit conditions.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Permit Condition C1.6	<p>This permit condition limits annual operating time for the subject equipment to 500 hours.</p> <p>Snow Summit anticipates exceeding this annual limit of the subject equipment before the end of 2024.</p>
Rule 1100(d)(9)(A) and (B)	<p>These provisions specify that Low-Use Diesel-Fired Electrical Generators at Ski Resorts must not exceed 500 hours of annual operating time, and if they do exceed 500 hours then they must be decommissioned, retrofitted, or repowered. (This rule cross-references Rule 1110.1 for specific parameters regarding the units.)</p> <p>Snow Summit anticipates exceeding 500 hours on the subject equipment before the end of 2024 in violation of this rule, and cannot meet requirements triggered if the 500 hours are exceeded.</p>
Rule 1110.2(d)(1)(B)(vi)	<p>This provision requires compliance with the emission concentration limits listed in Table II for Low-Use Engines (defined as less than 500 hours of operating use annually).</p> <p>Snow Summit anticipates exceeding the 500 hours before the end of 2024 and is unable to comply with emissions requirements set forth.</p>
Rule 1110.2(e)(9)	<p>This rule requires that engines exceeding the 500-hour low use threshold must be brought into compliance with applicable NOx limits and other criteria within the timeframe specified in the rule, including Table VI of the rule.</p> <p>Snow Summit anticipates exceeding the 500 hours before the end of 2024 and is unable to comply with the requirements that would be triggered under this provision.</p>

203(b) 2004(f)(1) 3002(c)(1)	These rules require that all equipment operated in compliance with rules and permit conditions applicable to the facility.  Although the equipment is currently operating properly, Snow Summit anticipates exceeding 500 operating hours by the end of 2024, which would be a violation of rules and permit conditions as explained above.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes  No

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes  No

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes  No

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes  No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

Petitioner Snow Summit is requesting a short variance in order to allow the six internal combustion engines (the "engines") that are the subject of this variance petition to operate beyond their annual 500-hour limit for the remainder of this calendar year, which would be a violation of permit conditions and rule requirements as explained above. Petitioner also seeks variance relief from rule requirements that would be triggered by the exceedance of the annual 500-hour limit, such as the requirement to either decommission the engines or retrofit them to Best Available Retrofit Control Technology (BARCT) standards. These engines drive electrical generators that provide the energy to power water pumps and air compressors for snowmaking operations which are critical to Petitioner particularly in the early winter season from Thanksgiving through the New Year's holiday.

As described in more detail below, Petitioner had reasonably expected that its project to electrify its snowmaking operations would have been completed before the start of the 2024-2025 ski season, but due to a variety of circumstances beyond its control – including third-party approvals, the pandemic and natural disasters, including extreme winter weather and the recent Line Fire – Petitioner has come to the realization that there is no way to advance the electrification project in time to curtail its use of the six engines in November and December. Therefore, Petitioner must be able to operate the engines beyond the 500-hour annual limit over the months of November and December in order to ensure it can be fully operational during this key time when there is often very little natural snow.

### **The Electrification Project**

As described briefly in Section 5 above, the local utility that serves Snow Summit, Bear Valley Electric Service (BVES), has not had – and does not have – the resources to provide sufficient power to meet the needs of Petitioner's snowmaking operation. BVES is a small utility, serving approximately 24,360 customers in a 32-square mile service area. Currently, BVES is only able to provide approximately 2.5 MW of power to Snow Summit, which does not approach the nearly 14.5 MW needed for the snowmaking operations. Therefore, Snow Summit installed their own electrical generating equipment and the six engines have been operating on a seasonal basis since then.

The ~\$6.5-million-dollar capital project to electrify Petitioner's extensive snowmaking system is a substantial undertaking, involving the construction of a ~14.5 megawatt (MW) power plant and associated substation upgrades in close cooperation and coordination with BVES. Specifically, the project would allow Snow Summit to limit its own generating operations to backup status and instead purchase its electrical power requirements from BVES. Snow Summit is currently connected to the BVES distribution system via a small, dedicated and aging 2.5 MVA substation located at the base of the resort which is being replaced with two substations capable of distributing the 14.5 MW of power need by the resort.

Petitioner's current generation is largely self-reliant, but the electrification project involves funding and facilitating this project to add power to the grid via a new generating plant and upgraded substations constructed and operated by BVES, with the power distributed to

Snow Summit. Some of the infrastructure will be constructed on public lands, in the San Bernardino National Forest. It is a public power project over which Petitioner does not have direct control, and which triggers numerous third-party regulatory processes, including necessary engagement with and approvals from the California Public Utilities Commission (PUC) and the United States Forest Service, among other agencies. In short, Snow Summit has been managing and advancing a complex project, in close partnership with a strictly regulated public entity, and shepherding it through a highly bureaucratic process involving numerous agency stakeholders.

While many factors motivated Petitioner to take numerous concrete steps to develop this project beginning in the 2015-2016 timeframe (though discussions with BVE had begun earlier), planning for the RECLAIM transition was significant factor in developing the project's timeline. Petitioner has been an active stakeholder in the relevant RECLAIM exit rulemaking – including the rules at issue here - routinely participating in working groups and providing comments and input. They are engaged and active members of the regulated community and have worked diligently to provide input on the RECLAIM exit rules that apply to them.

By the time the initial RECLAIM exit rules were adopted in 2019, Petitioner and BVES had already (in 2018) gone through a procedure by which the PUC authorized BVES to grant Snow Summit's request for the provision of supplemental service, along with the replacement of the substations, provided the costs for the project were borne by Snow Summit. BVES thereafter had to follow necessary application procedures with the PUC to advance the process, while Petitioner remained engaged to the extent permitted by the utility's regulatory mechanisms.

With initial PUC authorizations in place by February 2020, Petitioner and BVE had committed to entering into a binding agreement by the end of that year that would detail the project scope and development plan. In April 2020, the early days of the Covid-19 pandemic, BVES published a request for proposal (RFP) for the Snow Summit. Still, progress was slowed during the first year of the pandemic.

Nonetheless, Petitioner continued working diligently to advance the project, and by the second year of the pandemic, in November 2021, had entered into the project agreement with BVES as they had committed to in February 2020.

In the 2021 timeframe, the project was estimated to be completed by the 2023-2024 ski season; completion by the 2024-2025 ski season was a "worst case scenario." This continued to be valid as recently as this past September 2024.

By late February 2023, Petitioner and BVES had completed the necessary applications to the US Forest Service for their review. However, beginning late February 2023, a record-setting series of blizzards dropped 11 feet of snow in the San Bernardino mountains over the course of two weeks, a disaster that left individuals trapped in their homes for days on end without power, food, or supplies. This disaster slowed progress on the electrification project as well. BVES was understandably focused on restoring power and damaged

infrastructure, while Petitioner was focused on ensuring the safety of its slopes and surrounding resort areas, including its own employees and visitors.

By July of 2023, Petitioner and BVES had selected a subcontractor, Elgin – a choice that was schedule-driven rather than cost-driven. Elgin committed to ensuring the project would be complete between 56-60 weeks, which was between August and September 2024 – in time to power up the substations by the 2024-2025 season.

Meanwhile, the Forest Service application review process moved slowly, despite regular prompting from Snow Summit and its affiliates. In February 2024, nearly one year after the application was deemed complete, Petitioner came to understand that the Forest Service was very short-staffed, lacking a regional permit administrator, biologist and botanist. Moreover, a biologist and botanist would need to walk the site but would need to wait for the snow to melt later in the spring. BVES offered to facilitate the Forest Service's use of their consultant biologist. Ultimately, the USFS completed the necessary reviews and approvals, but the delay due to staffing and weather meant that construction would need to be completed over the summer and fall of 2024, rather than over two summers in 2023 and 2024. Still, completing construction in 2024 remained feasible and Petitioner and BVES worked diligently to advance the project.

#### **Recent Project Hurdles Beyond Petitioner's Control**

Despite the challenges outlined above, Petitioner still believed it was possible for the contractor to deliver on its promised completion date. Petitioner understands that through late spring and summer, BVES had been pushing the contractor, Elgin, for certainty and confirmation of the construction schedule and delivery of the substations. However, in July 2024, the Elgin reported to BVES that it expected delays due a supplier who could not ship the necessary transformers by the required deadlines. BVES relayed this delay to Petitioner and pushed back on the contractor, reminding them that the purchase order promised delivery of the substations in the fall, and that time would need to be made up elsewhere. However, the contractor pointed out that the delay in the transformer vendor was beyond their control as well, and that the transformers would not be able to ship until October and December 2024 (meaning that the substations would have to ship 3-4 weeks later). Nonetheless, BVES and Petitioner continued to push the contractor for a solution.

Work continued through this past summer and into the fall on the project, both on the ground and in communication with agencies. High-voltage lines and conduit were installed, slabs were poured, and the site readied to the extent it could be. Additionally, BVES engaged in communications with oversight agencies, including CalTrans regarding necessary permits for oversized loads bringing heavy equipment along the winding mountain roads to Big Bear.

However, on September 5, the Line Fire broke out, spreading rapidly and ultimately burning nearly 44,000 acres and triggering mandatory evacuation orders and warning in Big Bear and the surrounding communities. Project construction activities paused for two weeks during this time, resuming on September 20 (even though the fire was still actively burning, although by then it was 53% contained).



The project faced another unexpected hurdle when, on October 9, Caltrans denied BVES' permit application to allow transport on Highway 38 of the oversized equipment and materials, including the 50,000-lb underground vaults that the project required. The solution quickly agreed upon is to use the longer route via the 15 freeway and Highway 18. Although this is was a minor hurdle quickly overcome, it became apparent that Petitioners would not be able to power the substations in time to replace the power supplied by its six engines. Thus, Petitioner needs this short variance relief to allow it to run its engines while it diligently works to complete the project before significant natural snowfall occurs.

#### **No Alternatives to Variance Relief**

Being able to fully open the ski resort in time for the November-December holiday ski season is of critical importance for Petitioner (it is also an economic engine for the nearby mountain communities). Based on a review of historical data, Snow Summit takes in 41% of its seasonal revenue during November, December and the first two weeks of January, yet only 25% of seasonal snowfall occurs during that time period, so their revenue is highly dependent on their snowmaking ability during the last two months of the year.

Petitioner driven this complex project aggressively and reasonably expected that it would be able to power at least part of the resort by this ski season, as recently as a month ago.

#### ***Petitioner Must Run its Engines Beyond the 500-Hour Annual Limit in November and December:***

BVES cannot supply sufficient power – and there is not sufficient infrastructure – to supply even part of the power needed for snowmaking capabilities. Due to the existing infrastructure, including the 2.5MW substation and the power generation capabilities, BVES cannot provide sufficient – or sufficiently reliable – power to replace the need to run the six engines for snowmaking activities needed in November and December.

Snow Summit must be able to operate its *entire* snowmaking system at this point in the season. Given the anticipated lack of snowfall in November and December, along with the importance of the holiday ski season for Snow Summit (and the surrounding communities), the ski resort must be able to fully open by ensuring its skiable terrain has snow, weather conditions permitting. As explained above, the period between mid-late November and early-mid January accounts for 41% of Snow Summit's revenue during the year, but historically only 25% of seasonal snowfall has occurred during that timeframe. Therefore, it is critical that Snow Summit be able to fully operate its snowmaking equipment to cover all of its skiable terrain during that time. Only opening part of the resort during that time would have an outsized impact on visitation and revenue in that timeframe (and of course there are ripple effects felt by the City of Big Bear Lake and the community's businesses).

#### ***Petitioner Cannot Comply With Rule Requirements to Decommission or Retrofit its Engines if it Exceeds the 500-Hour Annual Limit:***

Internal BARCT analysis completed in 2019 demonstrated it was not cost effective to retrofit decades-old diesel engines, which was a motivating factor in aggressively pursuing the electrification project. As it diligently prepared for the RECLAIM-exit, Petitioner, with its consultants at Yorke Engineering, conducted a BARCT analysis to assess the cost effectiveness of retrofitting the six engines, even though by this time it had committed to the electrification project. The conclusions of the analysis was that BARCT was above cost effectiveness thresholds under various scenarios, underscoring the importance of proceeding with the electrification project with all due haste. Undoubtedly, the cost effectiveness now – as compared to five years ago – would be even further beyond the threshold. Petitioner is nearly at the finish line of a substantial \$6.5 million capital project, and it would be infeasible and impractical to spend millions more to retrofit engines that it intends to relegate to backup generator status as soon as next year.

Petitioner cannot decommission its six engines because they will need to remain online in a backup capacity. Bringing a ~14.5 MW power plant and new substations online will come with some uncertainty. Moreover, even the largest utilities with widespread infrastructure suffer some instability, and BVES is no exception. Because snowmaking can only be conducted when temperature and humidity conditions are optimal, Petitioner has to retain the ability to conduct snowmaking even if there is an interruption in grid power on the new system. Therefore, once the electrification project is operational, the engines will remain online but they will only be used in a backup capacity.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

Please refer to section 14, above.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

Petitioner has continued to diligently pursue completion of the project to the extent it has been able to given the recent disruption due to the Line Fire. Petitioner has been in regular communication with District staff for the past several months regarding its concern about the potential to exceed the 500-hour annual limit, and our understanding is that staff has likewise explored whether there were viable alternatives to proceeding with the variance but did not identify any alternative pathways that would allow Petitioner to operate as needed.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$ \$4.3MM to \$10.6MM

Number of employees laid off (if any): ~194

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

Based on a review of recent visitor data correlated with poor snowfall or late season opening, Petitioner estimates that if their snowmaking abilities are limited, they could experience 10% and 25% fewer visitors to the resort than expected, resulting in a potential revenue loss could range from approximately \$4.3MM to \$10.6MM. This is a significant economic impact to Snow Summit, as well as to the city of Big Bear Lake's tax revenue and the secondary benefits to the area.

Additionally, if the resort cannot fully open due to impaired snowmaking ability, Petitioner anticipates that it would be unable to employ 194 individuals, who otherwise would have full-time positions at the resort.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

No, please refer to the latter part of the response in Section 14, above. Curtailment would effectively be limiting the ability to conduct full snowmaking operations and would have the same economic and employment impacts as if the variance were not granted.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
NOx	493	0	493

CO	64	0	64
VOC	18	0	18
PM	6	0	6
SOx	4	0	4

\* Column A minus Column B = Column C

Excess Opacity:     N/A     %

20. Show calculations used to estimate quantities in No. 19 or explain why there will be no excess emissions.

Please refer to Attachment B to the Petition: "Snow Summit Excess Emission Calculations."

Daily Excess Emissions are calculated based on 24 hours of continuous usage for all engines. Petitioner does not expect to need the engines every day of the variance period but requests the flexibility to use them as needed given the importance November and December to its annual revenue. The actual excess emissions may be much less if favorable weather conditions occur during the variance period.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

Every effort will be made to only use the engines if favorable weather conditions do not occur. If favorable weather conditions occur and abundant natural snow fall occurs, then the use of the engines will be scaled back.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

The six engines are all equipped with hour meters. Snow Summit will plan to calculate the excess emissions based on the number of running hours during the variance period.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

Compliance will be achieved with the start of a new calendar year and the 500-hour limit resets. Additionally, the substation project that will eventually supply the necessary electrical power from the grid will be completed in 2025.

24. State the date you are requesting the variance to begin: Upon the hearing date ;  
and the date by which you expect to achieve final compliance: January 1, 2025

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:  
N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

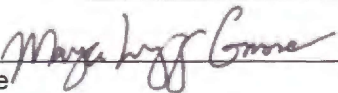
Paolo Longoni Ext. 2428  
Shawn Bennage Ext. 3151

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Maya Lopez Grasse Alston & Bird LLP Counsel  
Name Company Title

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on October 28, 2024, at Tehachapi, California

Signature 

Maya Lopez Grasse  
Print Name

Title: Counsel

ATTACHMENT A



**FACILITY PERMIT TO OPERATE  
SNOW SUMMIT, LLC.**

**SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS**

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION ENGINES</b>					
<b>System 1: NON-EMERGENCY</b>					
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	C89	NOX: LARGE SOURCE**	CO: 0.448 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 20.02 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; CO: 250 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]; HAP: (10) [40CFR 63 Subpart ZZZZ, 1-18-2008]; NOX 50 PPMV (4) [RULE 2005, 6-3-2011; RULE 2005, 12-4-2015] NOX: 50 PPMV DIESEL (3) [RULE 2012, 5-6-2005; RULE 2012, 12-4-2015]; PM: (9) [RULE 404, 2-7-1986]; PM10: 0.045 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; PM10: 2.01 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996]; VOC: 3.75 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; VOC: 22 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 30 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]	C1.6, D12.4, D29.1, E57.1, E71.3, E448.2, H23.3, K67.8, K67.10

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
(3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit  
(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit  
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE  
SNOW SUMMIT, LLC.**

**SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS**

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 1: INTERNAL COMBUSTION ENGINES</b>					
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	C90	NOX: LARGE SOURCE**	CO: 0.448 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 20.02 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; CO: 250 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]; HAP: (10) [40CFR 63 Subpart ZZZZ, 1-18-2008]; NOX 50 PPMV DIESEL (4) [RULE 2005, 6-3-2011; RULE 2005, 12-4-2015]; NOX: 50 PPMV DIESEL (3) [RULE 2012, 5-6-2005; RULE 2012, 12-4-2015] PM: (9) [RULE 404, 2-7-1986]; PM10: 0.045 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; PM10: 2.01 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; VOC: 3.75 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; VOC: 22 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 30 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]	C1.6, D12.4, D29.1, E57.1, E71.3, E448.2, H23.3, K67.8, K67.10

- \* (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.





**FACILITY PERMIT TO OPERATE  
SNOW SUMMIT, LLC.**

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<b>Process 1: INTERNAL COMBUSTION ENGINES</b>					
<b>INTERNAL COMBUSTION ENGINE,</b> LEAN BURN, NON-EMERGENCY, <b>G-3,</b> DIESEL FUEL, CUMMINS, MODEL QSK78-G6, 18 CYLINDERS, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP A/N: 629634	<b>D75</b>	C91	NOX: LARGE SOURCE**	CO: 0.448 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]; CO: 20.02 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2) -Offset, 12-6-2002]; CO: 250 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]; HAP: (10) [40CFR 63 Subpart ZZZZ, 1-18-2008]; NOX 50 PPMV DIESEL (4) [RULE 2005, 6-3-2011; RULE 2005, 12-4-2015]; NOX: 50 PPMV DIESEL (3) [RULE 2012, 5-6-2005; RULE 2012, 12-4-2015] PM: (9) [RULE 404, 2-7-1986]; PM: 0.01 GRAM/BHP-HR (5) [RULE 1470, 5-4-2012]; PM10: 0.045 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; PM10: 2.01 LBS/1000 GAL (7) [RULE 1303(b)(2) -Offset, 5-10-1996; RULE 1303(b) (2)-Offset, 12-6-2002]; VOC: 3.75 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2) -Offset, 12-6-2002]; VOC: 22 PPMV (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a) (1)-BACT, 12-6-2002]; VOC: 30 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]	B61.1, C1.6, D12.4, D29.1, E57.1, E71.3, E448.2, H23.3, K67.8, K67.10

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
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(5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit  
(7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)  
(9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

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SNOW SUMMIT, LLC.**

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<b>Process 1: INTERNAL COMBUSTION ENGINES</b>					
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	C92	NOX: LARGE SOURCE**	CO: 0.448 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 20.02 LBS/1000 GAL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; CO: 250 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]; HAP: (10) [40CFR 63 Subpart ZZZZ, 1-18-2008]; NOX: 50 PPMV DIESEL (3) [RULE 2012, 5-6-2005; RULE 2012, 12-4-2015]; NOX: 50 PPMV DIESEL (4) [RULE 2005, 6-3-2011; RULE 2005, 12-4-2015] PM: (9) [RULE 404, 2-7-1986]; PM: 0.01 GRAM/BHP-HR (5) [RULE 1470, 5-4-2012]; PM10: 0.045 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; PM10: 2.01 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; VOC: 3.75 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; VOC: 22 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 30 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]	B61.1, C1.6, D12.4, D29.1, E57.1, E71.3, E448.2, H23.3, K67.8, K67.10

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
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## FACILITY PERMIT TO OPERATE SNOW SUMMIT, LLC.

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<b>Process 1: INTERNAL COMBUSTION ENGINES</b>					
<b>INTERNAL COMBUSTION ENGINE,</b> LEAN BURN, NON-EMERGENCY, <b>G-5,</b> DIESEL FUEL, CUMMINS, MODEL QSK78-G6, 18 CYLINDERS, DRIVING AN ELECTRICAL GENERATOR, WITH AFTERCOOLER, TURBOCHARGER, 3043 HP A/N: 629636	<b>D79</b>	C93	NOX: LARGE SOURCE**	CO: 0.448 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) -BACT, 12-6-2002]; CO: 20.02 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2) -Offset, 12-6-2002]; CO: 250 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]; HAP: (10) [40CFR 63 Subpart ZZZZ, 1-18-2008]; NOX 50 PPMV DIESEL (3) [RULE 2012, 5-6-2005; RULE 2012, 12-4-2015]; NOX: 50 PPMV DIESEL (4) [RULE 2005, 6-3-2011; RULE 2005, 12-4-2015] PM: (9) [RULE 404, 2-7-1986]; PM: 0.01 GRAM/BHP-HR (5) [RULE 1470, 5-4-2012]; PM10: 0.045 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; PM10: 2.01 LBS/1000 GAL DIESEL (7) [RULE 1303(b) (2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; VOC: 3.75 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2) -Offset, 5-10-1996; RULE 1303(b) (2)-Offset, 12-6-2002]; VOC: 22 PPMV (4) [RULE 1303(a)(1) -BACT, 5-10-1996; RULE 1303(a) (1)-BACT, 12-6-2002]; VOC: 30 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]	B61.1, C1.6, D12.4, D29.1, E57.1, E71.3, E448.2, H23.3, K67.8, K67.10

\* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate  
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**FACILITY PERMIT TO OPERATE  
SNOW SUMMIT, LLC.**

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<b>Process 1: INTERNAL COMBUSTION ENGINES</b>					
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	C94	NOX: LARGE SOURCE**	CO: 0.448 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; CO: 20.02 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; CO: 250 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]; HAP: (10) [40CFR 63 Subpart ZZZZ, 1-18-2008]; NOX 50 PPMV DIESEL (3) [RULE 2012, 5-6-2005; RULE 2012, 12-4-2015]; NOX: 50 PPMV DIESEL (4) [RULE 2005, 6-3-2011; RULE 2005, 12-4-2015]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.01 GRAM/BHP-HR (5) [RULE 1470, 5-4-2012]; PM10: 0.045 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; PM10: 2.01 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; VOC: 3.75 LBS/1000 GAL DIESEL (7) [RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]; VOC: 22 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; VOC: 30 PPMV (5) [RULE 1110.2, 2-1-2008; RULE 1110.2, 6-3-2016]	B61.1, C1.6, D12.4, D29.1, E57.1, E71.3, E448.2, H23.3, K67.8, K67.10

- \* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
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## FACILITY PERMIT TO OPERATE SNOW SUMMIT, LLC.

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

**C1.6** The operator shall limit the operating time to no more than 500 hour(s) in any one year.

To comply with this condition, the operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1401, 3-4-2005; RULE 2012, 5-6-2005; RULE 2012, 12-4-2015]

[Devices subject to this condition : D69, D70, D75, D78, D79, D80]

**C6.1** The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 25 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the CRT particulate filter.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C72, C74]

**C6.2** The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 30 inches water column.

This condition shall only apply to verify the combined pressure drop across the SCR, PM filter, and Oxidation Catalyst.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the system.

The operator shall determine and record the parameter being monitored once every 1 days.

ATTACHMENT B

Snow Summit Engine Usage Summary

Device	SOKO 1 D69						SOKO 2 D70						SOKO 3 D75						
	Month	Hours of Operations	End of Month Elapsed Timer Readings	Fuel Usage (gal)	End of Month Fuel Meter Readings (gal)	Fuel Usage (Mgal)	Fuel Usage Rate (Mgal/hr)	Hours of Operations	End of Month Elapsed Timer Readings	Fuel Usage (gal)	End of Month Fuel Meter Readings (gal)	Fuel Usage (Mgal)	Fuel Usage Rate (Mgal/hr)	Hours of Operations	End of Month Elapsed Timer Readings	Fuel Usage (gal)	End of Month Fuel Meter Readings (gal)	Fuel Usage (Mgal)	Fuel Usage Rate (Mgal/hr)
Jun-2023				1,306,008.6					1,300,851.4						1,012,463.7				
Jul-2023	0	11787.00	0.00	1,306,008.6	0.000	0.000	0	11929.00	0.00	1,300,861.4	0.000	0.000	0	9621.00	0.00	1,012,463.7	0.000	0.000	
Aug-2023	0	11787.00	0.00	1,306,008.6	0.000	0.000	0	11929.00	0.00	1,300,861.4	0.000	0.000	0	9621.00	0.00	1,012,463.7	0.000	0.000	
Sep-2023	7	11794.00	639.20	1,306,647.8	0.639	0.091	6	11935.00	555.40	1,301,416.8	0.555	0.093	5	9626.00	477.60	1,012,941.3	0.478	0.096	
Oct-2023	8	11802.00	757.00	1,307,404.8	0.757	0.095	0	11935.00	0.00	1,301,416.8	0.000	0.000	0	9626.00	5.50	1,012,946.8	0.006	0.000	
Nov-2023	138	11940.00	15996.90	1,323,401.7	15.997	0.116	139	12074.00	15675.90	1,317,092.7	15.676	0.113	97	9723.00	10486.90	1,021,433.7	10.487	0.108	
Dec-2023	166	12106.00	18836.50	1,342,238.2	18.837	0.113	171	12245.00	19030.30	1,336,123.0	19.030	0.111	297	10020.00	12085.80	1,035,519.5	12.086	0.041	
Jan-2024	198	12304.00	22398.10	1,364,636.3	22.398	0.113	122	12367.00	13171.30	1,349,294.3	13.171	0.108	20	10040.00	21434.30	1,056,953.8	21.434	1.072	
Feb-2024	53	12357.00	5515.00	1,370,151.3	5.515	0.104	57	12424.00	5766.00	1,355,060.3	5.766	0.101	53	10093.00	5370.70	1,062,324.5	5.371	0.101	
Mar-2024	0	12357.00	0.00	1,370,151.3	0.00	0.000	6	12430.00	460.40	1,355,520.7	0.46	0.077	0	10093.00	0.00	1,062,324.5	0.00	0.000	
Apr-2024	0	12357.00	0.00	1,370,151.3	0.00	0.000	0	12430.00	0.00	1,355,520.7	0.00	0.000	0	10093.00	0.00	1,062,324.5	0.00	0.000	
May-2024	0	12357.00	0.00	1,370,151.3	0.00	0.000	6	12436.00	616.10	1,356,136.8	0.62	0.103	0	10093.00	10.00	1,062,334.5	0.01	0.000	
Jun-2024	0	12357.00	0.00	1,370,151.3	0.00	0.000	15	12451.00	1628.40	1,357,765.2	1.63	0.109	1	10094.00	11.40	1,062,345.9	0.01	0.011	

Device	MCH 1 D78						MCH 2 D79						MCH 3 D80						
	Month	Hours of Operations	End of Month Elapsed Timer Readings	Fuel Usage (gal)	End of Month Fuel Meter Readings (gal)	Fuel Usage (Mgal)	Fuel Usage Rate (Mgal/hr)	Hours of Operations	End of Month Elapsed Timer Readings	Fuel Usage (gal)	End of Month Fuel Meter Readings (gal)	Fuel Usage (Mgal)	Fuel Usage Rate (Mgal/hr)	Hours of Operations	End of Month Elapsed Timer Readings	Fuel Usage (gal)	End of Month Fuel Meter Readings (gal)	Fuel Usage (Mgal)	Fuel Usage Rate (Mgal/hr)
Jun-2023				1,112,727.8					1,167,635.7						1,135,729.9				
Jul-2023	0	9473.00	0.00	1,112,727.8	0.000	0.000	1	9931.00	62.40	1,167,698.1	0.062	0.062	2	9681.00	10.80	1,135,740.7	0.011	0.005	
Aug-2023	0	9473.00	0.00	1,112,727.8	0.000	0.000	0	9931.00	0.00	1,167,698.1	0.000	0.000	0	9681.00	0.00	1,135,740.7	0.000	0.000	
Sep-2023	6	9479.00	616.90	1,113,344.7	0.617	0.103	9	9940.00	979.30	1,168,277.4	0.979	0.109	5	9686.00	488.50	1,136,229.2	0.489	0.098	
Oct-2023	0	9479.00	15.10	1,113,359.8	0.015	0.000	6	9946.00	593.60	1,169,271.0	0.594	0.099	0	9686.00	46.50	1,136,275.7	0.047	0.000	
Nov-2023	156	9635.00	18792.70	1,132,152.5	18.793	0.120	148	10094.00	18611.10	1,187,882.1	18.611	0.126	127	9813.00	15762.20	1,152,077.9	15.762	0.124	
Dec-2023	166	9801.00	20139.80	1,152,292.3	20.140	0.121	163	10257.00	20134.80	1,208,016.9	20.135	0.124	207	10020.00	25017.70	1,177,075.6	25.038	0.121	
Jan-2024	199	10000.00	23737.70	1,176,030.0	23.738	0.119	202	10459.00	24837.40	1,232,854.3	24.837	0.123	197	10217.00	24030.00	1,201,105.6	24.030	0.122	
Feb-2024	53	10051.00	6053.20	1,182,083.2	6.053	0.114	56	10515.00	8563.30	1,239,417.6	8.563	0.117	55	10272.00	8648.30	1,207,751.9	8.648	0.121	
Mar-2024	8	10061.00	777.20	1,182,860.5	0.78	0.097	4	10519.00	311.30	1,239,728.9	0.31	0.078	11	10283.00	955.10	1,208,707.0	0.96	0.087	
Apr-2024	0	10061.00	0.00	1,182,860.5	0.00	0.000	0	10519.00	0.00	1,239,728.9	0.00	0.000	0	10283.00	0.00	1,208,707.0	0.00	0.000	
May-2024	0	10061.00	0.00	1,182,860.5	0.00	0.000	0	10519.00	0.00	1,239,728.9	0.00	0.000	0	10283.00	3.20	1,208,710.2	0.00	0.000	
Jun-2024	0	10061.00	0.00	1,182,860.5	0.00	0.000	0	10519.00	0.00	1,239,728.9	0.00	0.000	0	10283.00	16.30	1,208,726.5	0.02	0.000	

Example Large Source Emission Calculation

Pollutant	Monthly Fuel Usage (Mgal)	Pollutant concentration limit (ppmv @ 15% O2)	Reference oxygen percentage (% O2)	Dry F-factor for oxygen for natural gas fuel (dscf/MMBtU)	Higher Heating Value of Natural Gas (MMBtU/Mgal)	Total NOx Emissions (lb)
	d <sup>1</sup>	c	b	F <sub>d</sub>	V	
NOx	0.0108	50	15.00	9150	137	0.29

$$NOx \text{ Emissions } \left( \frac{lb}{month} \right) = C \times \left[ \frac{20.9}{(20.9 - b)} \right] \times (1.214 \times 10^{-7}) \times (F_d \times d \times V)$$

Reference:  
2012, Appendix A, Chapter 3, Eq. 17

Notes  
1 Example fuel usage to show how large source emissions are calculated

Snow Summit Excess Emission Calculations

Device	Permit A/N	Rating (kW)	Fuel Type	Average Fuel Usage Rate (Mgal/hr)	Projected Daily Hours of Usage <sup>1</sup>	Projected Daily Fuel Usage (Mgal)	EF (lb/mgal)	NOx			CO			VOC			PM			SOx						
								Source	Daily Excess Emissions (lb/day)	Hourly Excess Emissions (lb/hr)	EF (lb/mgal)	Source	Daily Excess Emissions (lb/day)	Hourly Excess Emissions (lb/hr)	EF (lb/mgal)	Source	Daily Excess Emissions (lb/day)	Hourly Excess Emissions (lb/hr)	EF (lb/mgal)	Source	Daily Excess Emissions (lb/day)	Hourly Excess Emissions (lb/hr)	EF (lb/mgal)	Source	Daily Excess Emissions (lb/day)	Hourly Excess Emissions (lb/hr)
D69 (SOKD ICE #1)	629605	3,043	Diesel	0.105	24	2.5	27.1	Back calculated Rule 2012, Appendix A, Chapter 3, Eq. 17	66.5	2.8	3.5	Source Test <sup>2</sup>	8.8	0.4	1.1	Source Test <sup>2</sup>	2.8	0.1	0.1	Source Test <sup>2</sup>	0.2	0.0	0.2	AQMD Default	0.5	0.0
D70 (SOKD ICE #2)	629659	3,043	Diesel	0.102	24	2.4	27.1	Back calculated Rule 2012, Appendix A, Chapter 3, Eq. 17	66.1	2.8	3.5	Source Test <sup>2</sup>	8.5	0.4	1.2	Source Test <sup>2</sup>	3.0	0.1	0.1	Source Test <sup>2</sup>	0.3	0.0	0.2	AQMD Default	0.5	0.0
D75 (SOKD ICE #3)	629634	3,043	Diesel	0.238	24	5.7	27.1	Back calculated Rule 2012, Appendix A, Chapter 3, Eq. 17	154.7	6.4	3.7	Source Test <sup>2</sup>	21.0	0.9	0.9	Source Test <sup>2</sup>	5.4	0.2	0.1	Source Test <sup>2</sup>	0.3	0.0	0.2	AQMD Default	1.2	0.1
D78 (MACH ICE #1)	629635	3,043	Diesel	0.113	24	2.7	27.1	Back calculated Rule 2012, Appendix A, Chapter 3, Eq. 17	73.1	3.0	3.8	Source Test <sup>2</sup>	9.8	0.4	1.0	Source Test <sup>2</sup>	2.8	0.1	0.2	Source Test <sup>2</sup>	0.8	0.0	0.2	AQMD Default	0.8	0.0
D79 (MACH ICE #2)	629636	3,043	Diesel	0.105	24	2.5	27.1	Back calculated Rule 2012, Appendix A, Chapter 3, Eq. 17	66.0	2.8	3.3	Source Test <sup>2</sup>	8.4	0.3	1.0	Source Test <sup>2</sup>	2.8	0.1	1.5	Source Test <sup>2</sup>	3.0	0.2	0.2	AQMD Default	0.5	0.0
D80 (MACH ICE #3)	629637	3,043	Diesel	0.097	24	2.3	27.1	Back calculated Rule 2012, Appendix A, Chapter 3, Eq. 17	62.9	2.8	3.5	Source Test <sup>2</sup>	8.1	0.3	0.8	Source Test <sup>2</sup>	1.4	0.1	0.5	Source Test <sup>2</sup>	1.2	0.1	0.2	AQMD Default	0.5	0.0
<b>Totals:</b>								<b>492</b>	<b>20.8</b>	<b>64</b>	<b>2.7</b>	<b>18</b>	<b>0.7</b>	<b>8</b>	<b>0.3</b>	<b>4</b>	<b>0.2</b>									

Notes:  
1 Excess emission calculations based on all engines operating 24 hours per day.  
2 Emission factor from SCAQMD approved source test conducted in 2021  
3 Emission factor from SCAQMD approved source test conducted in 2017