

Douglas Hall

Subject: FW: Syar Industries - Plant #A2158 - Application Number 23532

From: Brian Bateman
Sent: Friday, May 25, 2012 2:26 PM
To: lisa.harper@yahoo.com
Cc: Jim Karas; Dennis Jang; Jennifer Cooper; Jack Broadbent; Jeffrey McKay
Subject: FW: Syar Industries - Plant #A2158 - Application Number 23532

Hi Lisa:

Director Wagenknecht asked that we respond to your inquiry regarding the proposed Synthetic Minor Operating Permit (SMOP) for the Syar Industries plant in Napa. Your comments, and any others received during the public comment period, will be considered as a part of our evaluation, and responses provided at the time final action is taken on the permit application.

At this time, I would like to provide clarification on one point. The regulations specify that a facility may elect to become a synthetic minor facility. If the District issues the SMOP as proposed, federally enforceable conditions will be established requiring that emissions from the facility cannot exceed specified thresholds to ensure that the facility is not a "major source". If the facility subsequently fails to comply with these "synthetic minor limits", a Title V permit can be required. The actual emissions from the Syar facility have historically been well below the major source thresholds, however.

Note that if a Title V permit were instead to be issued to the facility (hypothetically, as the facility has not applied for a Title V permit), no such additional emission limits could be imposed through the permitting process.

If you have any questions on this matter, please contact me at (415) 749-4653, or Dennis Jang at (415) 749-4707.

With regards,

- Brian

Brian Bateman
Director of Compliance & Enforcement
Bay Area AQMD
(415) 749-4653

From: Lisa Harper [<mailto:lisa.harper@yahoo.com>]
Sent: Thursday, May 17, 2012 8:43 PM
To: Wagenknecht, Brad
Cc: Sean A. Gallagher; Djang@baaqmd.gov; jtechel@cityofnapa.org; Caldwell, Keith; mvangorder@cityofnapa.org; jinman@cityofnapa.org; Luce, Mark; Dodd, Bill; Dillon, Diane; jkrider@cityofnapa.org; pmott@cityofnapa.org
Subject: Syar Industries - Plant #A2158 - Application Number 23532

Dear County Supervisors (Supervisor Wagenknecht, Napa County's Bay Area Air Quality Management District representative):

I regularly receive public notice notifications of all BAAQMD permit applications and news and advisories. Today I received an email notification for Syar Industries' permit application for a synthetic minor operating permit for their Napa facility (Plant A2158) and am concerned that their facility should be required to operate as a Title V facility.

As Napa's representative on the Air District Board, could I ask that you please visit the District's website (link below) and review the notice, application and engineering evaluation for Syar Industries's application for the Synthetic Minor Operating Permit. While the facility does not currently require a Title V permit for its operations and source emissions, according to the engineering evaluation, with approval of the new application Syar will exceed emissions of NOx, CO, and CO2e. In my view, it would be an environmentally beneficial to our City and County that Syar be required to operate as a Title V facility and/or reduce these emissions under their current and new synthetic minor operating permit.

Approval of this application will require additional monitoring, but the facility is located very close to highly populated areas, i.e., Napa Valley College, Napa State Hospital, the Napa Corporate Park, as well as the future (proposed) Napa Pipe housing development of 700-900 homes. As you know, potential emissions from the plant can be highly toxic for cancer forming diseases. The deadline for response is June 18, 2012. I have copied the engineer in charge of the application with the hopes of receiving a response, as well as our City Council officials.

Thank you very much for your attention to this matter.

Sincerely, Lisa Harper

<http://baaqmd.gov/Divisions/Engineering/Public-Notices-on-Permits/2012/050812-23532/Syar-Industries-Inc.aspx>

Lisa Harper

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