

## Faye Thomas

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**Subject:** FW: [External] - FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

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**From:** Mohan Balagopalan <[mbalagopalan@aqmd.gov](mailto:mbalagopalan@aqmd.gov)>  
**Sent:** Wednesday, July 3, 2024 11:09 AM  
**To:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Subject:** Re: [External] - FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

Hi,  
With the revised F&D document, I approve for this case to be heard on Consent. Thanks.

Mohan

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**From:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Sent:** Wednesday, July 3, 2024 10:46:29 AM  
**To:** Mohan Balagopalan <[mbalagopalan@aqmd.gov](mailto:mbalagopalan@aqmd.gov)>  
**Subject:** FW: [External] - FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

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**From:** Mary Reichert <[mreichert@aqmd.gov](mailto:mreichert@aqmd.gov)>  
**Sent:** Wednesday, July 3, 2024 10:22 AM  
**To:** Bill Winchester <[bwinchester@montrose-env.com](mailto:bwinchester@montrose-env.com)>; Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Cc:** Patrick Choi <[PChoi@aqmd.gov](mailto:PChoi@aqmd.gov)>  
**Subject:** RE: [External] - FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

Madam Clerk and Hearing Board Members,

I realized I made a mistake in the proposed findings. The interim variance was actually granted on May 23<sup>rd</sup>, so a final compliance date of May 20, 2025 would still be under one year and not require increments of progress.

I have revised the proposed findings to reflect the new chair, the correct interim variance date, and the revisions to the excess emission fee payment dates. Attached are versions with the changes highlighted and a clean version.

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**From:** Mohan Balagopalan  
**Sent:** Wednesday, July 3, 2024 9:52 AM  
**To:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Subject:** Re: [External] - FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

Hi,  
I am okay with quarterly payment schedule. Please have them provide an updated F&D document with the changes and the new end date. Once I receive the revised document, I will send my approval. Thanks.

Mohan

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**From:** Mary Reichert <[mreichert@aqmd.gov](mailto:mreichert@aqmd.gov)>  
**Sent:** Wednesday, July 3, 2024 9:40 AM  
**To:** Bill Winchester <[bwinchester@montrose-env.com](mailto:bwinchester@montrose-env.com)>; Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Cc:** Patrick Choi <[PChoi@aqmd.gov](mailto:PChoi@aqmd.gov)>  
**Subject:** RE: [External] - FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

The District has no objections to these revisions.

Thank you,  
Mary

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**From:** Bill Winchester <[bwinchester@montrose-env.com](mailto:bwinchester@montrose-env.com)>  
**Sent:** Wednesday, July 3, 2024 9:35 AM  
**To:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>; Mary Reichert <[mreichert@aqmd.gov](mailto:mreichert@aqmd.gov)>  
**Cc:** Patrick Choi <[PChoi@aqmd.gov](mailto:PChoi@aqmd.gov)>  
**Subject:** RE: [External] - FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

Dear Madam Clerk,

In regards to Mr. Balagopalan's questions below, we have the following responses:

1. The permit modification application package and application package for the new filter permit were both submitted to SCAQMD and to the Clerk of the Board on the same day. Since this was already transmitted to the Clerk in its entirety, it should already have been entered into the record with the Board. Since these documents were already provided, we are ok if they are considered to be an exhibit for the Regular Variance.
2. We are okay moving the end date in order to avoid the increments of progress.
3. A purchase order has been issued to the vendor of the air filter system, indicating that it plans to install the filter system regardless of any subsequent test results.
4. We are okay if the excess emissions fees for the Interim Variance period is due by August 15, but request that subsequent installment payments be paid quarterly instead of monthly, by the 15<sup>th</sup> day of the new quarter. So the first set of fees would be due August 15, 2024, the next would be due October 15, 2024. Subsequent milestone dates would be January 15, 2025 and April 15, 2025. Are these terms agreeable to the Board?

Please let me know if you have any further questions.

Best Regards,

**Bill Winchester**  
Principal Scientist  
Montrose Environmental  
Office: +1-714-282-8240 | Mobile: +1-909-226-1108

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**From:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Sent:** Wednesday, July 3, 2024 9:11 AM  
**To:** Mary Reichert <[mreichert@aqmd.gov](mailto:mreichert@aqmd.gov)>  
**Cc:** Bill Winchester <[bwinchester@montrose-env.com](mailto:bwinchester@montrose-env.com)>; Patrick Choi <[PChoi@aqmd.gov](mailto:PChoi@aqmd.gov)>  
**Subject:** [External] - FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3  
**Importance:** High

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**From:** Mohan Balagopalan  
**Sent:** Wednesday, July 3, 2024 9:00 AM  
**To:** Clerk of Board <[Front\\_PC@aqmd.gov](mailto:Front_PC@aqmd.gov)>  
**Subject:** Re: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

Hi,

I have a few questions/suggestions.

1. The permit modification application package was submitted by the petitioner on June 14, 2023. Should this be marked as an Exhibit?
2. Under Health & Safety Code 42358(b), a variance issued for more than a year should include a schedule of Increments of Progress. I am counting from the date based on the interim variance granted on April 23, 2024, until the requested end date of May 20, 2025. The petitioner can avoid submitting the Increment of Progress if the variance end date is revised to keep it under a year.

H&SC 42358(b)- A variance may be issued for a period exceeding one year if the variance includes a schedule of increments of progress specifying a final compliance date by which the emissions of air contaminants of a source for which the variance is granted will be brought into compliance with applicable emission standards.

3. Am I to assume that the Petitioner will continue installing the HEPA control system even if they conduct a subsequent source test and the results show compliance with Rule 1420 emission limits?

Suggestion.

Revised Condition #5.

5. The petitioner shall pay all applicable fees, including excess emissions fees, by August 15, 2024, for the period from April 23, 2024, to July 31, 2024. Thereafter, Petitioner shall pay the excess emission fees by the 15th of each subsequent month, for the previous month's emissions. The excess emission fee shall be calculated based on Lead emission fee in Rule 303 Table I. If the fees that are due are not paid, the variance shall be invalidated pursuant to Rule 303 – Hearing Board Fees, subsection (k).

If the F&D document is revised, please update the name of the current chair.

Thanks. I will wait for the responses to my questions before deciding to hear this case on Consent Calendar.

Mohan Balagopalan

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