

James Harader

From: Joe Selgrath [selgrath@ix.netcom.com]
Sent: Monday, February 22, 2010 1:19 PM
To: James Harader
Subject: EnviroTEch Consultants, Inc. Comments to Cogeneration BPS

Thank you for allowing us to comment on the proposed BPS program. As the program has not been fully defined, we are providing the following general comments.

- 1) There are multiple types of equipment, facility design, and operational characteristics that make establishment of "BPS" difficult. We recommend that the District structure BPS following the existing categories and organization of the District's BACT guidelines.
- 2) BPS is already in effect for new sources through the District's BACT guidelines. BACT standards achieve reductions in priority pollutants from operation of specified equipment and processes. BACT standards, by their nature, improve the energy efficiency of affected equipment i.e. through combustion controls, increased maintenance, and periodic combustion monitoring. For these reasons (and others) BPS should be equivalent to BACT for this category and type of source.
- 3) BPS needs to provide exemptions for small sources small sources of GHG emissions. EPA is proposing a threshold of 25,000 MT CO₂e, and a similar threshold should be part of any BPS determination.
- 4) Cogeneration facilities are already inherently energy efficient. The combined energy and electrical production efficiently is variable and depends on the facilities electrical demand and thermal demand.

Thanks

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