Message

From: Rodney Bonner [rodneybonner44@gmail.com]
Sent: 9/11/2020 3:25:31 PM
To: Beckham, Lisa [BECKHAM.LISA@EPA.GOV]; robert powell [rpowell@tmtanf.org]; oquiroz@tmtanf.org
Subject: Fwd: Emissions information

Team
This is the response I got fromJune regarding the test information for the equipment in service.

Rodney Bonner
RB&A Inc

Sent from my iPhone

Begin forwarded message:

> **From:** 张俊 <june@doinggroup.com>
> **Date:** September 10, 2020 at 11:35:29 PM PDT
> **To:** Rodney Bonner <rodneybonner44@gmail.com>
> **Cc:** thomas_kwok <thomas_kwok@rolandgrass.com>, siamese bred <siamesebred100@gmail.com>, sinh slu <sinhslu@gmail.com>, robert powell <rpowell@tmtanf.org>
> **Subject: Re:Re: Emissions information**
>
> Hello Rondey,
>
> This emission report was tested and issued by government, not the customer.
> In China, customer apply to set up this plant at first, then after everything is ready, government will go to customer's factory to test the emissions to see if the results are within the emissions standard or not.
> If yes, the machine could be put into normal running.
> If not, the machine has to be stopped for modification, till its emission meet the standard.
>
> I'm afraid that we could not ask government to do anything...
> Hope you understand.
>
> Best regards,
>
> June

---- 原邮件信息 -----
发件人:Rodney Bonner <rodneybonner44@gmail.com>
收件人:张俊 <june@doinggroup.com>;
抄送人:thomas_kwok <thomas_kwok@rolandgrass.com>; siamese bred <siamesebred100@gmail.com>; sinh slu

<sinhslu@gmail.com>; robert powell <rpowell@tmtanf.org>;
发送时间:2020-09-11 12:21:04
主题:Re: Emissions information

June,
Thank you for your response.
Would it be possible to ask the company how they tested their machines and got the results they have? It would be very helpful.

Thank you very much for your time and efforts.

Rodney Bonner
RB&A Inc

Sent from my iPhone

On Sep 10, 2020, at 8:33 PM, 张俊 <june@doinggroup.com> wrote:

Hello Rodney,

Sorry for late reply.

And I have to say sorry that I really tried but that emission report I sent you is the only one I can get which is accurate and real tested in Chinese customer's factory...
If I have a detailed EPA report in hand, I would directly send you without any hesitate.
I also want to help you to get this project finalized as soon as possible.
Because only this way, you could buy machine from us.
But I really don't have other reports in hand.
And I don't want to make a fake one to you.
Please understand.

Best regards,

June

<f67445b748391d56014858970db35542-ft.png>

-------- 原邮件信息 --------
发件人:Rodney Bonner <rodneybonner44@gmail.com>
收件人:thomas_kwok@rolandgrass.com; june <june@doinggroup.com>; siamese bred

<siamesebred100@gmail.com>; sinh slu <sinhslu@gmail.com>; robert powell <rpowell@tmtanf.org>;
发送时间:2020-09-09 00:42:00
主题:Emissions information

Team,
this is the response received by the Tribe's EPA for the Emissions reviews for this our recycling equipment. There is additional information requested regarding the method of testing and information needed to complete the review of the emissions. I have included the emails from EPA representative Lisa Beckham.

From: Beckham, Lisa [mailto:BECKHAM.LISA@EPA.GOV]
Sent: Wednesday, September 02, 2020 2:26 PM
To: Robert Powell
Cc: Otoniel Quiroz
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

Sorry for the delayed response, I was out of the office for a few days.

- The provided emissions information does not identify the test methods used to measure emissions, so I doubt we could rely on them.
- Emissions are provided in milligrams per cubic meter. This is a concentration, like parts per million or percentage. For permitting purposes, we have to have the mass emission rate (for example, grams/second or pound/hour) to calculate the potential tons per year of pollutant emitted. Without the flowrate of the stack (for example, cubic meters per second), I can't calculate the tons per year of emissions. (Also, we still have the problem identified above where we don't know that we can even rely on these emission estimates.)
- While information for some important pollutants are listed, not all of the pollutants I've identified are listed.

Lisa

From: Robert Powell <rpowell@tmtanf.org>
Sent: Wednesday, August 26, 2020 9:41 AM
To: Beckham, Lisa <BECKHAM.LISA@EPA.GOV>
Cc: oquiroz@tmtanf.org
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

Good morning Lisa,

I have attached additional information regarding the emissions for the proposed project from the applicant. I also attached the plant packet sent 8/19 for reference if needed.

Thanks.

Respectfully,

Robert Powell, AICP, MURP
Torres Martinez Desert Cahuilla Tribe
Planning Director
Office: 760-397-0300 ext 12054

Cell: 760-844-5162
rpowell@tmdci-nsn.gov

From: Beckham, Lisa [mailto:BECKHAM.LISA@EPA.GOV]
Sent: Wednesday, August 19, 2020 10:59 AM
To: Robert Powell
Cc: Otoniel Quiroz
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

Thanks Robert, this is really helpful.

A few concerns:

1. I believe I found their website: https://www.doinggroup.com/index.php?u=show-1798.html. There are no other U.S. installations of this product.
2. Page 8: "In addition, the flue gas after combustion of the exhaust gas is effectively treated to meet the environmental standards for flue gas emissions."
    a. There is no information about what standards they are referring to, or any indication as to what pollutants are being emitted, or the specific controls being used.
3. I'm concerned whether this company could produce the type of emissions information we would need to permit this equipment. The fact that none of the materials, including the website, provide emissions information is disconcerting. (Especially considering how many installations they claim to have.)
4. The statement on page 8 about the "flue gas after combustion," implies to me that this product likely doesn't meet the definition of pyrolysis that EPA uses. Thus, we may have to treat it as an incinerator and trigger stricter federal requirements (in addition to the minor NSR permit that would be required in all cases).

After seeing this information, I would also want to know emissions of hazardous air pollutants like dioxin/furans, benzene, HCl, styrene, and polycylic aromatic hydrocarbons (PAHs) (in addition to what is listed below.)

Lisa

--

Rodney Bonner
Tribal Senior
(760) 600-0160