

## Comment Letter #57

**Via E-Mail**

Kevin Ni  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
kni@aqmd.gov

**RE: *Comments on Notice of Preparation of Draft Program Environmental Impact Report  
2022 Air Quality Management Plan***

Dear Mr. Ni,

PQ LLC (PQ) is writing to submit comments on the South Coast Air Quality Management District's (SCAQMD's) Notice of Preparation of a Draft Program Environmental Impact Report (DEIR) regarding the 2022 Air Quality Management Plan (AQMP), in regards to the 2015 ozone national ambient air quality standard (NAAQS). PQ operates a sodium silicate manufacturing facility in South Gate, CA and is regulated by the SCAQMD. PQ offers the following comments:

1. SCAQMD proposed in the AQMP nitrogen oxides (NOx) emission reductions by "replacing or retrofitting boilers and process heaters used in industrial, institutional, and commercial operations with zero and low NOx emission technologies." The AQMP estimates an emission reduction of 0.5 tons/day by 2037 under this control strategy.

PQ does not believe that zero emission boilers are available at commercial scale or with adequately demonstrated reliability in industrial applications such as at PQ's facility. PQ encourages SCAQMD to carefully examine the availability of zero emission boilers on an industry and facility-specific basis before incorporating it as a strategy for attaining the 2015 ozone NAAQS. Moreover, for many facilities, revisions to SCAQMD Rule 1146 required implementation of additional NOx reductions in as recently as 2018, which is well after the 2015 ozone NAAQS. It is not clear whether the AQMP's quantification of NOx reductions to achieve the 2015 ozone NAAQS factors these emission reductions from revisions to Rule 1146. Reductions of NOx that have been achieved recently by many facilities, such as use of low-NOx burners, should be factored into the AQMP in determining the need for additional NOx reductions.

2. The AQMP proposes to achieve additional NOx reductions from RECLAIM facilities through implementation of best available retrofit control technology (BARCT). PQ notes that AQMD recently determined in the development of amendments to Rule 1117 that ceramic catalytic filter systems such as the Tri-mer control system that PQ currently uses on its sodium silicate furnace would constitute BARCT. At this time, PQ is not aware of other technologies that are commercially available that reasonably achieve a greater level of NOx emissions reduction. Therefore, for sources such as sodium silicate manufacturers, the AQMP should not include additional NOx reductions.



PQ appreciates the opportunity to comment on the 2022 AQMP DEIR. IF you have any questions, please contact me at 484-402-0791 or Jim Olivier at our Southgate plant at 323-326-1100.

Best Regards,

A handwritten signature in black ink that reads "Joseph P. Lala". The signature is written in a cursive style and is positioned above a horizontal line.

**Joseph P. Lala**  
Sr. Environmental Manager