



air pollution control district  
SANTA BARBARA COUNTY

June 24, 2025

Via Email  
Read Receipt Requested

Jonathan Hall  
NuSil Technology  
2343 Pegasus Dr.  
Bakersfield, CA 93308

**Re: Conditional Approval of 2023 Air Toxics Emission Inventory Plan and Report for NuSil Technology – Air Toxics “Hot Spots” Information and Assessment Act (AB 2588)**

Dear Jonathan Hall:

The Santa Barbara County Air Pollution Control District (District) has reviewed your revised Air Toxics Emission Inventory Plan (ATEIP) dated June 2025 and the associated emission calculation spreadsheet (i.e., the Air Toxics Emission Inventory Report or ATEIR). Based on our review, the District *conditionally approves* the revised ATEIP/R subject to changes noted in the attachment to this letter.

Please submit a final ATEIP, final ATEIR, response letter and health risk assessment (HRA) by December 24, 2025. The response letter should include a response to each Conditional Approval item in the attachment. Electronic copies of the ATEIP, ATEIR, response letter and HRA should be sent via email to [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org).

If you have any questions or require additional information, please contact me at (805) 979-8314 or [MountainC@sbcapcd.org](mailto:MountainC@sbcapcd.org).

Sincerely,

Charlotte Mountain  
Engineering Division

cc: NuSil Technology 02361 Project File  
NuSil Technology 02361 Toxics File  
Toxics Group  
Engr Chron File  
Glenn Gazdecki, NuSil Technology

Attachment: ATEIP/R Conditional Approval Items

\\sbcapcd.org\shares\Toxics\ActiveSourceFiles\SSID04621\_NuSil\_Technology\AB 2588 IY 2023\Condition Approval Letter for NuSil 2023 ATEIP and R.docx

## ATTACHMENT

### **NuSil 2023 ATEIP/R Conditional Approval Items**

1. Attachment B-6: Section 3.4.2 states that the calculation methodology for xylene dispersions is presented in Attachment B-6. The March 2025 version of the ATEIP included this methodology in the attachment, but the June 2025 version of the ATEIP does not. Add Attachment B-6 back to the final ATEIP.
2. QA Lab Maximum Hourly Emissions: There is an error in the maximum hourly emission calculation equation for the QA Lab in Section 3.4.2 of the June 2025 ATEIP. The equation states that the annual emissions of a pollutant will be divided by 12 months/year and the default 21.7 days of operation per month, then multiplied by the weight fraction to obtain the maximum hourly emissions. The annual emissions of each pollutant already account for the weight fraction. This results in an error in the maximum hourly emission calculations for sodium hydroxide in the *Manufacturing VOL12-13* tab of the ATEIR, as the emissions are multiplied by 0.5 and therefore underestimated by a factor of 2. Correct the emissions in the final ATEIR, and remove the weight fraction term from the maximum hourly emission calculation equation in Section 3.4.2 of the final ATEIP.
3. Welding Maximum Hourly Emissions: Section 3.5.1 of the June 2025 ATEIP contains two equations for the maximum hourly emissions from welding operations. The second equation, in which the hourly emissions are set equal to the estimated daily emissions, was used in the ATEIR and is the District-approved methodology. For this reason, no changes to the welding emissions in the ATEIR are required. However, for clarity, remove the first maximum hourly emission calculation equation from Section 3.5.1 in the final ATEIP.