

DEC 28 2010

Mel Johnson
Greenfield County Water District
551 Taft Highway
Bakersfield, CA 93307

**Re: Notice of Preliminary Decision - Authority to Construct
Project Numbers: S-1100666 and S-1104552**

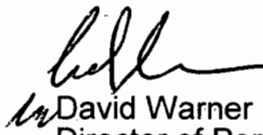
Dear Mr. Johnson:

Enclosed for your review and comment is the District's analysis of Greenfield County Water District's application for an Authority to Construct for the installation of two emergency IC engines powering electrical generators, at various specified locations.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Kris Rickards of Permit Services at 661-392-5611.

Sincerely,



David Warner
Director of Permit Services

DW:ktr

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



DEC 28 2010

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

Re: Notice of Preliminary Decision - Authority to Construct
Project Number: S-1100666 and S-1104552

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Greenfield County Water District's application for an Authority to Construct for the installation of two emergency IC engines powering electrical generators, at various specified locations.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

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Bakersfield Californian
Bakersfield Californian

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
AN AUTHORITY TO CONSTRUCT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Authority to Construct to Greenfield County Water District for the installation of two emergency IC engines powering electrical generators, at various specified locations.

The analysis of the regulatory basis for this proposed action, Project #S-1100666 and S-1104552, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**

**San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review
Diesel-Fired Emergency Standby IC Engines**

Facility Name: Greenfield County Water District
551 Taft Highway
Mailing Address: Bakersfield, CA 93307

Date: December 22, 2010
Engineer: Kris Rickards
Lead Engineer: Steve Leonard *CS* 12/23/10

Contact Person: Mel Johnson
Telephone: 661-831-0989
Application #: S-7764-1-0 and S-7875-1-0
Project #: S-1100666 and S-1104552
Complete: July 14, 2010

I. Proposal

Greenfield County Water District is proposing to obtain operating permits for two diesel-fired emergency standby internal combustion (IC) engines powering electrical generators.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule ^{added} (9/21/06)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4701 Stationary Internal Combustion Engines – Phase 1 (8/21/03)
Rule 4702 Stationary Internal Combustion Engines – Phase 2 (1/18/07)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Title 13 California Code of Regulations (CCR), Section 2423 – Exhaust Emission Standards and Test Procedures, Off-Road Compression-Ignition Engines and Equipment
Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines
California Environmental Quality Act (CEQA)
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The engines will be located adjacent to the wells they service at the following locations:

Permit Unit	Section	Township	Range
S-7764-1	30	30S	28E
S-7875-1	32	30S	28E

The District has verified that unit S-7764-1 is located within 1,000 feet of the outer boundary of a K-12 school and unit S-7875-1 is not (see Location Maps in Appendix B). Therefore, the public notification requirement of California Health and Safety Code 42301.6 is applicable to project S-1100666.

IV. Process Description

The emergency standby engines power electrical generators. Other than emergency standby operation engine S-7764-1 may be operated up to 21 hours per year and engine S-7875-1 may be operated up to 50 hours per year for maintenance and testing purposes.

V. Equipment Listing

S-7764-1-0: 530 BHP CATERPILLAR MODEL 3406 TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR (BERKSHIRE)

S-7875-1-0: 483 BHP CATERPILLAR MODEL 3456 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR (PANAMA)

VI. Emission Control Technology Evaluation

The applicant has proposed to install a Tier 1 and a Tier 2 certified diesel-fired IC engine that are both fired on very low-sulfur diesel fuel (0.0015% by weight sulfur maximum).

The proposed engines meet the latest Tier Certification requirements for the year and horsepower rating at the time of installation; therefore, the engines meet the latest ARB/EPA emissions standards for diesel particulate matter, hydrocarbons, nitrogen oxides, and carbon monoxide (see Appendix C for a copy of the emissions data sheet and/or the ARB/EPA executive order).

The use of very low-sulfur diesel fuel (0.0015% by weight sulfur maximum) reduces SO_x emissions by over 99% from standard diesel fuel.

VII. General Calculations

A. Assumptions

Emergency operating schedule: 24 hours/day
 Non-emergency operating schedule: 21 hours/year for S-7764-1 and 50 hours/year for S-7875-1
 Density of diesel fuel: 7.1 lb/gal
 EPA F-factor (adjusted to 60 °F): 9,051 dscf/MMBtu
 Fuel heating value: 137,000 Btu/gal
 BHP to Btu/hr conversion: 2,542.5 Btu/bhp-hr
 Thermal efficiency of engine: commonly ≈ 35%
 PM₁₀ fraction of diesel exhaust: 0.96 (CARB, 1988)

S-7875-1:

The engine has certified NO_x + VOC emissions of 4.77 g/bhp-hr. It will be assumed the NO_x + VOC emission factor is split 95% NO_x and 5% VOC (per the District's Carl Moyer program).

B. Emission Factors

S-7764-1 Emission Factors		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO _x	6.86	Manufacturer
SO _x	0.0051	Mass Balance Equation Below
PM ₁₀	0.37	Manufacturer
CO	8.50	Manufacturer
VOC	0.97	Manufacturer

S-7875-1 Emission Factors		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO _x	4.53	Manufacturer
SO _x	0.0051	Mass Balance Equation Below
PM ₁₀	0.15	Manufacturer
CO	2.61	Manufacturer
VOC	0.24	Manufacturer

$$\frac{0.000015 \text{ lb-S}}{\text{lb-fuel}} \times \frac{7.1 \text{ lb-fuel}}{\text{gallon}} \times \frac{2 \text{ lb-SO}_2}{1 \text{ lb-S}} \times \frac{1 \text{ gal}}{137,000 \text{ Btu}} \times \frac{1 \text{ bhp input}}{0.35 \text{ bhp out}} \times \frac{2,542.5 \text{ Btu}}{\text{bhp-hr}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.0051 \frac{\text{g-SO}_x}{\text{bhp-hr}}$$

C. Calculations

1. Pre-Project Emissions (PE1)

Since these are new emissions units, PE1 = 0.

2. Post Project PE (PE2)

The daily and annual PE are calculated as follows:

S-7764-1:

Project Emissions (PE2)						
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Annual Hours of Operation (hrs/yr)	Daily PE2 (lb/day)	Annual PE2 (lb/yr)
NO _x	6.86	530	24	21	192.2	168
SO _x	0.0051	530	24	21	0.1	0
PM ₁₀	0.37	530	24	21	10.4	9
CO	8.50	530	24	21	238.1	208
VOC	0.97	530	24	21	27.2	24

S-7875-1:

Project Emissions (PE2)						
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Annual Hours of Operation (hrs/yr)	Daily PE2 (lb/day)	Annual PE2 (lb/yr)
NO _x	4.53	483	24	50	115.7	241
SO _x	0.0051	483	24	50	0.1	0
PM ₁₀	0.15	483	24	50	3.8	8
CO	2.61	483	24	50	66.6	139
VOC	0.24	483	24	50	6.1	13

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Since this is a new facility, there are no existing permit units or any ERCs banked at this facility. Thus:

SSPE1 = 0 lb/yr for all criteria pollutants

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid ATCs or PTOs, except for emissions units proposed to be shut down as part of the Stationary Project, at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Since this is a new facility, SSPE2 is equal to the change in emissions for the facility due to the installation of the new emergency standby IC engines, permit units S-7764-1, '-2, '-3, as previously determined in Section VII.C.2. Thus:

Facility S-7764 SSPE2					
Permit Unit	NO _x (lb/yr)	SO _x (lb/yr)	PM ₁₀ (lb/yr)	CO (lb/yr)	VOC (lb/yr)
S-7764-1, emergency standby IC engine	168	0	9	208	24
SSPE2 Total	168	0	9	208	24

Facility S-7875 SSPE2					
Permit Unit	NO _x (lb/yr)	SO _x (lb/yr)	PM ₁₀ (lb/yr)	CO (lb/yr)	VOC (lb/yr)
S-7875-1, emergency standby IC engine	241	0	8	139	13
SSPE2 Total	241	0	8	139	13

5. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site."

This facility does not contain ERCs which have been banked at the source; therefore, no adjustment to SSPE2 is necessary.

Facility S-7764 Major Source Determination					
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Major Source Threshold (lb/yr)	Existing Major Source?	Becoming a Major Source?
NO _x	0	168	20,000	No	No
SO _x	0	0	140,000	No	No
PM ₁₀	0	9	140,000	No	No
CO	0	208	200,000	No	No
VOC	0	24	20,000	No	No

Facility S-7875 Major Source Determination					
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Major Source Threshold (lb/yr)	Existing Major Source?	Becoming a Major Source?
NO _x	0	241	20,000	No	No
SO _x	0	0	140,000	No	No
PM ₁₀	0	8	140,000	No	No
CO	0	139	200,000	No	No
VOC	0	13	20,000	No	No

As seen in the tables above, these facilities are not an existing Major Source and also are not becoming a Major Source as a result of this project.

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22

Since these are all new emissions units, BE = PE1 = 0 for all criteria pollutants and for all units in this project.

7. SB 288 Major Modification

Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

As discussed in Section VII.C.5 previously, these facilities are not a Major Source for any criteria pollutant; therefore, the project does not constitute a Major Modification.

8. Federal Major Modification

As shown in the previous section, this project does not constitute a Major Modification. Therefore, in accordance with District Rule 2201, Section 3.17, this project does not constitute a Federal Major Modification and no further discussion is required.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- a) Any new emissions unit with a potential to emit exceeding two pounds per day,
- b) The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d) Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

Since these engines are new emissions units, the daily emissions are compared to the BACT thresholds in the following tables:

Emissions Unit S-7764-1 BACT Applicability				
Pollutant	Daily Emissions (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
NO _x	192.2	> 2.0	n/a	Yes
SO _x	0.1	> 2.0	n/a	No
PM ₁₀	10.4	> 2.0	n/a	Yes
CO	238.1	> 2.0 and SSPE2 ≥ 200,000 lb/yr	437	No
VOC	27.2	> 2.0	n/a	Yes

Emissions Unit S-7875-1 BACT Applicability				
Pollutant	Daily Emissions (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
NO _x	115.7	> 2.0	n/a	Yes
SO _x	0.1	> 2.0	n/a	No
PM ₁₀	3.8	> 2.0	n/a	Yes
CO	66.6	> 2.0 and SSPE2 ≥ 200,000 lb/yr	437	No
VOC	6.1	> 2.0	n/a	Yes

Thus BACT will be triggered for NO_x, PM₁₀, and VOC emissions from both engines for this project.

b. Relocation of emissions units – PE > 2 lb/day

As discussed previously in Section I, these engines are not being relocated from one stationary source to another as a result of this project. Therefore, BACT is not triggered for the relocation of emissions units with a PE > 2 lb/day.

c. Modification of emissions units – Adjusted Increase in Permitted Emissions (AIPE) > 2 lb/day

As discussed previously in Section I, these engines are not being modified as a result of this project. Therefore, BACT is not triggered for the modification of emissions units with an AIPE > 2 lb/day.

d. Major Modification

As discussed previously in Section VII.C.7, this project does not constitute a Major Modification. Therefore, BACT is not triggered for a Major Modification.

2. BACT Guideline

BACT Guideline 3.1.1, which appears in Appendix A of this report, covers diesel-fired emergency IC engines.

3. Top Down BACT Analysis

Per District Policy APR 1305, Section IX, "A top-down BACT analysis shall be performed as a part of the Application Review for each application subject to the BACT requirements pursuant to the District's NSR Rule for source categories or classes covered in the BACT Clearinghouse, relevant information under each of the following steps may be simply cited from the Clearinghouse without further analysis."

As these engines were installed without first obtaining an ATC, BACT at the time of installation will be used. For these engines, the applicable BACT guideline is 3.1.3, 2nd quarter 2001, for emergency diesel IC engines ≥ 400 bhp.

Pursuant to the attached Top-Down BACT Analysis, which appears in Appendix A of this report, BACT is satisfied with:

NO_x: Certified emissions of 6.9 g/bhp-hr or less
VOC: Positive crankcase ventilation
PM₁₀: 0.4 g/bhp-hr or less

The following conditions will be listed on the ATCs to ensure compliance with the PM₁₀ BACT emissions limit:

S-7664-1:

- {edited 3486} Emissions from this IC engine shall not exceed 0.37 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

S-7875-1:

- {edited 3486} Emissions from this IC engine shall not exceed 0.15 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

B. Offsets

Since emergency IC engines are exempt from the offset requirements of Rule 2201, per Section 4.6.2, offsets are not required for this engine, and no offset calculations are required.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

New Major Sources are new facilities, which are also Major Sources. As shown previously in Section VII.C.5, the SSPE2 is not greater than the Major Source threshold for any criteria pollutant. Therefore, public noticing is not required for this project for new Major Source purposes.

b. Major Modification

As demonstrated previously in Section VII.C.7, this project does not constitute a Major Modification; therefore, public noticing for Major Modification purposes is not required.

c. PE > 100 lb/day

The Daily PE for these emissions units are compared to the daily PE Public Notice Thresholds in the following tables:

S-7764-1 PE > 100 lb/day Public Notice Thresholds			
Pollutant	Daily PE (lb/day)	Public Notice Threshold (lb/day)	Public Notice Triggered?
NO _x	192.2	100	Yes
SO _x	0.1	100	No
PM ₁₀	10.4	100	No
CO	238.1	100	Yes
VOC	27.2	100	No

S-7875-1 PE > 100 lb/day Public Notice Thresholds			
Pollutant	Daily PE (lb/day)	Public Notice Threshold (lb/day)	Public Notice Triggered?
NO _x	115.7	100	Yes
SO _x	0.1	100	No
PM ₁₀	3.8	100	No
CO	66.6	100	No
VOC	6.1	100	No

As detailed in the preceding tables, the NO_x and CO 100 lb/day threshold was surpassed for project S-1100666 and the the NO_x 100 lb/day threshold was surpassed for project S-1104552. Therefore, public noticing is required for daily emissions greater than 100 lb/day for a new emissions unit for both projects.

d. Offset Threshold

The following table compares the SSPE1 with the SSPE2 to the offset thresholds in order to determine if any offset thresholds have been surpassed with this project.

Facility S-7764 Offset Threshold				
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Offset Threshold (lb/yr)	Public Notice Required?
NO _x	0	168	20,000	No
SO _x	0	0	54,750	No
PM ₁₀	0	9	29,200	No
CO	0	208	200,000	No
VOC	0	24	20,000	No

Facility S-7875 Offset Threshold				
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Offset Threshold (lb/yr)	Public Notice Required?
NO _x	0	241	20,000	No
SO _x	0	0	54,750	No
PM ₁₀	0	8	29,200	No
CO	0	139	200,000	No
VOC	0	13	20,000	No

As detailed in the preceding table, there were no offset thresholds surpassed with this project. Therefore, public noticing is not required for this project for surpassing the SSPE2 offset thresholds.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. $SSIPE = SSPE2 - SSPE1$. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

Facility S-7764 SSIPE Public Notice Threshold					
Pollutant	SSPE2 (lb/yr)	SSPE1 (lb/yr)	SSIPE (lb/yr)	SSIPE Threshold (lb/yr)	Public Notice Required?
NO _x	168	0	240	20,000	No
SO _x	0	0	0	20,000	No
PM ₁₀	9	0	13	20,000	No
CO	208	0	298	20,000	No
VOC	24	0	34	20,000	No

Facility S-7875 SSIPE Public Notice Threshold					
Pollutant	SSPE2 (lb/yr)	SSPE1 (lb/yr)	SSIPE (lb/yr)	SSIPE Threshold (lb/yr)	Public Notice Required?
NO _x	241	0	241	20,000	No
SO _x	0	0	0	20,000	No
PM ₁₀	8	0	8	20,000	No
CO	139	0	139	20,000	No
VOC	13	0	13	20,000	No

As detailed in the preceding tables, there were no SSIPE thresholds surpassed with these projects. Therefore, public noticing is not required for exceeding the SSIPE thresholds.

2. Public Notice Action

As discussed above, public noticing is required for both projects for surpassing the PE > 100 lb/day for a new emissions unit threshold for NO_x and CO emissions. Therefore, public notice documents will be submitted to the

California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT. For these emergency standby IC engine, the DELs are stated in the form of emission factors, the maximum engine horsepower rating, and the maximum operational time of 24 hours per day. Therefore, the following conditions (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

S-7764-1:

- {edited 3485} Emissions from this IC engine shall not exceed any of the following limits: 6.86 g-NOx/bhp-hr, 8.50 g-CO/bhp-hr, or 0.97 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
- {edited 3486} Emissions from this IC engine shall not exceed 0.37 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

S-7875-1:

- {edited 3485} Emissions from this IC engine shall not exceed any of the following limits: 4.53 g-NOx/bhp-hr, 2.61 g-CO/bhp-hr, or 0.24 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
- {edited 3486} Emissions from this IC engine shall not exceed 0.15 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

In addition, the DEL for SO_x is established by the sulfur content of the fuel being combusted in the engines. Therefore, the following condition will be listed on the ATCs to ensure compliance:

- {3395} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required for emergency standby IC engines to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification, and daily emission limit requirements of Rule 2201. As required by District Rule 4702, *Stationary Internal Combustion Engines - Phase 2*, these IC engines are subject to recordkeeping requirements. Recordkeeping requirements, in accordance with District Rule 4702, will be discussed in Section VIII, *District Rule 4702*, of this evaluation.

4. Reporting

No reporting is required to ensure compliance with Rule 2201.

F. Ambient Air Quality Analysis

Section 4.14.1 of this Rule requires that an ambient air quality analysis (AAQA) be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of a State or National ambient air quality standard. An AAQA is required to be performed for all New Source Review (NSR) public notice projects. As previously discussed in Section VIII.C this project requires that a public notice be performed before issuance of the ATC for this project. Therefore, the District is required to perform an AAQA for this project.

The Technical Services Division of the SJVAPCD conducted the required AAQA for this project. The results of the AAQA are presented in the following two tables. Refer to Appendix C of this document for the AAQA summary and the PM₁₀ 24 hour and annual emissions contribution levels for this project.

AAQA Results Summary for S-7764-1-0					
Pollutant	1 hr Average	3 hr Average	8 hr Average	24 hr Average	Annual Average
CO	Pass	N/A	Pass	N/A	N/A
NO _x	Pass ¹	N/A	N/A	N/A	Pass
SO _x	Pass	Pass	N/A	Pass	Pass
PM ₁₀	N/A	N/A	N/A	Pass ²	Pass ²

AAQA Results Summary for S-7875-1-0					
Pollutant	1 hr Average	3 hr Average	8 hr Average	24 hr Average	Annual Average
CO	Pass	N/A	Pass	N/A	N/A
NO _x	Pass ¹	N/A	N/A	N/A	Pass
SO _x	Pass	Pass	N/A	Pass	Pass
PM ₁₀	N/A	N/A	N/A	Pass ²	Pass ²

The proposed location of installation of the diesel-fired IC engine is in an attainment area for NO_x, CO, and SO_x. As shown by the preceding table of AAQA results the proposed installation of the diesel-fired IC engine will not cause a violation of a State or National ambient air quality standard for NO_x, CO, or SO_x. The proposed location for installation of the diesel-fired IC engine is in a non-attainment area for PM₁₀ (this is because the ambient concentration of PM₁₀ exceeds the National ambient air quality standard). Therefore, the increase in the ambient PM₁₀ concentration due to the installation of the proposed equipment will be compared to the EPA PM₁₀ level of significance, from 40 CFR Part 51.165 (b)(2). This comparison is presented in the following table.

Rule 2520 Federally Mandated Operating Permits

Since this facility's potential to emit does not exceed any major source thresholds of Rule 2201, this facility is not a major source, and Rule 2520 does not apply.

¹ The project was compared to the 1-hour NO₂ National Ambient Air Quality Standard that became effective on April 12, 2010 using the District's approved procedures.

²The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

Rule 4001 New Source Performance Standards (NSPS)

40 CFR 60 Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

§60.4200 - Applicability

This subpart is applicable to owners and operators of stationary compression ignited internal combustion engines that commence construction after July 11, 2005, where the engines are:

- 1) Manufactured after April 1, 2006, if not a fire pump engine.
- 2) Manufactured as a National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

Since the engines were installed prior to July 11, 2005 this subpart does not apply.

Rule 4101 Visible Emissions

Rule 4101 states that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. Therefore, the following condition will be listed on the ATC to ensure compliance:

- {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, the following condition will be listed on the ATC to ensure compliance:

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources (dated 3/2/01) specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Therefore pursuant to the policy, a risk management review has been performed for this project to analyze the impact of toxic emissions. For projects where the increase in cancer risk is greater than one per million, Toxic Best Available Control Technology (T-BACT) is required.

The HRA results for this project are shown below (see the HRA Summary in Appendix C):

HRA Results				
Unit	Acute Hazard Index	Chronic Hazard Index	Cancer Risk	T-BACT Required?
S-7764-1-0	N/A	N/A	0.96 in a million	No
S-7875-1-0	N/A	N/A	0.85 in a million	No

As demonstrated previously, T-BACT is not required for either unit because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary in Appendix C of this report, the emissions increases for this project was determined to be less than significant.

Therefore, the following conditions will be listed on the ATCs to ensure compliance:

S-7764-1:

- {edited 3486} Emissions from this IC engine shall not exceed 0.37 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
- {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]

- The exhaust stack release height shall not be less than 15 feet above grade. [District Rule 4102]
- This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 21 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

S-7875-1:

- {edited 3486} Emissions from this IC engine shall not exceed 0.15 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115].
- {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
- This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

Rule 4201 Particulate Matter Concentration

Particulate matter emissions from the engine will be less than or equal to the rule limit of 0.1 grain per cubic foot of gas at dry standard conditions as shown by the following:

S-7764-1:

$$0.37 \frac{g - PM_{10}}{bhp - hr} \times \frac{1g - PM}{0.96g - PM_{10}} \times \frac{1bhp - hr}{2,542.5 Btu} \times \frac{10^6 Btu}{9,051 dscf} \times \frac{0.35 Btu out}{1 Btu in} \times \frac{15.43 grain}{g} = 0.090 \frac{grain - PM}{dscf}$$

Since 0.090 grain-PM/dscf is ≤ to 0.1 grain per dscf, compliance with Rule 4201 is expected.

S-7875-1:

$$0.15 \frac{g - PM_{10}}{bhp - hr} \times \frac{1g - PM}{0.96g - PM_{10}} \times \frac{1bhp - hr}{2,542.5 Btu} \times \frac{10^6 Btu}{9,051 dscf} \times \frac{0.35 Btu out}{1 Btu in} \times \frac{15.43 grain}{g} = 0.037 \frac{grain - PM}{dscf}$$

Since 0.037 grain-PM/dscf is ≤ to 0.1 grain per dscf, compliance with Rule 4201 is expected.

Therefore, the following condition will be listed on the ATCs to ensure compliance:

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

Rule 4701 Internal Combustion Engines – Phase 1

Pursuant to Section 7.5.2.3 of District Rule 4702, as of June 1, 2006 District Rule 4701 is no longer applicable to diesel-fired emergency standby or emergency IC engines. Therefore, these diesel-fired emergency IC engines will comply with the requirements of District Rule 4702 and no further discussion is required.

Rule 4702 Internal Combustion Engines – Phase 2

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines.

This rule applies to any internal combustion engine with a rated brake horsepower greater than 50 horsepower.

Pursuant to Section 4.2, except for the requirements of Sections 5.7 and 6.2.3, the requirements of this rule shall not apply to an internal combustion engine that meets the following condition:

- 1) An emergency standby engine as defined in Section 3.0 of this rule, and provided that it is operated with a nonresettable elapsed operating time meter. In lieu of a nonresettable time meter, the owner of an emergency engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Section 3.15 defines an "Emergency Standby Engine" as an internal combustion engine which operates as a temporary replacement for primary mechanical or electrical power during an unscheduled outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the operator. An engine shall be considered to be an emergency standby engine if it is used only for the following purposes: (1) periodic maintenance, periodic readiness testing, or readiness testing during and after repair work; (2) unscheduled outages, or to supply power while maintenance is performed or repairs are made to the primary power supply; and (3) if it is limited to operate 100 hours or less per calendar year for non-emergency purposes. An engine shall not be considered to be an emergency standby engine if it is used: (1) to reduce the demand for electrical power when normal electrical power line service has not failed, or (2) to produce power for the utility electrical distribution system, or (3) in conjunction with a voluntary utility demand reduction program or interruptible power contract.

Therefore, the emergency standby IC engine involved with this project will only have to meet the requirements of Sections 5.7 and 6.2.3 of this Rule.

Section 5.7 of this Rule requires that the owner of an emergency standby engine shall comply with the requirements specified in Section 5.7.2 through Section 5.7.5 below:

- 1) Properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier.
- 2) Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.
- 3) Install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate or Stationary Equipment Registration condition. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Therefore, the following conditions will be listed on the ATC to ensure compliance:

- {3405} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
- {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
- {3403} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115]
- {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
- {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]

S-7764-1:

- {3811} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 21 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

S-7875-1:

- {3810} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

Section 6.2.3 requires that an owner claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and submitted to the APCO upon request and at the end of each calendar year in a manner and form approved by the APCO. Therefore, the following conditions will be listed on the ATCs to ensure compliance:

- {3479} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
- {3476} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. For units at unstaffed sites or operated remotely, records may be maintained and retained at a District-approved off-site location. [District Rule 4702 and 17 CCR 93115]

Rule 4801 Sulfur Compounds

Rule 4801 requires that sulfur compound emissions (as SO₂) shall not exceed 0.2% by volume. Using the ideal gas equation, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = (n \times R \times T) \div P$$

n = moles SO₂

T (standard temperature) = 60 °F or 520 °R

$$R \text{ (universal gas constant)} = \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot \text{°R}}$$

$$\frac{0.000015 \text{ lb} - \text{S}}{\text{lb} - \text{fuel}} \times \frac{7.1 \text{ lb}}{\text{gal}} \times \frac{64 \text{ lb} - \text{SO}_2}{32 \text{ lb} - \text{S}} \times \frac{1 \text{ MMBtu}}{9,051 \text{ scf}} \times \frac{1 \text{ gal}}{0.137 \text{ MMBtu}} \times \frac{\text{lb} - \text{mol}}{64 \text{ lb} - \text{SO}_2} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} - \text{mol} \cdot \text{°R}} \times \frac{520 \text{°R}}{14.7 \text{ psi}} \times 1,000,000 = 1.0 \text{ ppmv}$$

Since 1.0 ppmv is ≤ 2,000 ppmv, this engine is expected to comply with Rule 4801. Therefore, the following condition (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {3395} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]

California Health & Safety Code 42301.6 (School Notice)

The District has verified that the berkshire engine, S-7764-1, this site is located within 1,000 feet of the following school:

School Name: Valle Verde Elementary
Address: 400 Bershire Rd., Bakersfield, CA 93307

Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is required.

Prior to the issuance of the ATC for this equipment, notices will be provided to the parents/guardians of all students of the affected school, and will be sent to all residents within 1,000 ft of the site.

The District has verified that there are no additional schools within ¼ mile of the emission source.

Title 13 California Code of Regulations (CCR), Section 2423 – Exhaust Emission Standards and Test Procedures, Off-Road Compression-Ignition Engines and Equipment (Required by Title 17 CCR, Section 93115 for New Emergency Standby Diesel IC Engines)

Particulate Matter and VOC + NO_x, and CO Exhaust Emissions Standards:

This regulation stipulates that off-road compression-ignition engines shall not exceed the following applicable emissions standards.

S-7764-1:

Title 13 CCR, Section 2423 lists a diesel particulate emission standard of 0.40 g/bhp-hr (with 1.341 bhp/kW, equivalent to 0.54 g/kW-hr) for 1996 - 2000 model year engines with maximum power ratings of 301.7 - 603.4 bhp (equivalent to bhp 225 - 450 kW). The PM standards given in Title 13 CCR, Section 2423 are equivalent to the PM standards given in Title 17 CCR, Section 93115 (ATCM), thus the ATCM standards are the required standards and will be discussed in the following section.

Title 17 CCR, Section 93115, (e)(2)(A)(3)(b) stipulates that new stationary emergency standby diesel-fueled CI engines (> 50 bhp) must meet the VOC + NO_x, and CO standards for off-road engines of the same model year and maximum rated power as specified in the Off-Road Compression-Ignition Engine Standards (Title 13 CCR, Section 2423) or the Tier 1 standards for an off-road engine if no standards have been established for an off-road engine of the same model year and maximum rated power.

The engine involved with this project is a certified 2000 model engine. The following table compares the requirements of Title 13 CCR, Section 2423 to the emissions factors for the 530 bhp Caterpillar model #3406 diesel-fired emergency standby IC engine as given by the manufacturer.

Requirements of Title 13 CCR, Section 2423							
Source	Maximum Rated Power	Model Year	NO _x	VOC	NO _x + VOC	CO	PM
Title 13 CCR, §2423	301.7 – 603.4 bhp (225 - 450 kW)	1996-2001 (Tier 1)	6.9 g/bhp-hr (9.2 g/kW-hr)	1.0 g/bhp-hr (1.3 g/kW-hr)	--	8.5 g/bhp-hr (11.4 g/kW-hr)	0.40 g/bhp-hr (0.54 g/kW-hr)
Title 13 CCR, §2423	301.7 – 603.4 bhp (225 - 450 kW)	2001-2005 (Tier 2)	--	--	4.8 g/bhp-hr (6.4 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
Title 13 CCR, §2423	301.7 – 603.4 bhp (225 - 450 kW)	2006 and later (Tier 3)	--	--	3.0 g/bhp-hr (4.0 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
Caterpillar, Model # 3406	530 bhp	2000	6.9 g/bhp-hr (9.2 g/kW-hr)	1.0 g/bhp-hr (1.3 g/kW-hr)	--	8.5 g/bhp-hr (11.4 g/kW-hr)	0.37 g/bhp-hr (0.54 g/kW-hr)
Meets Standard?			Yes	Yes	N/A	Yes	Yes

As presented in the table above, the proposed engine will satisfy the requirements of this section and compliance is expected.

S-7875-1:

Title 13 CCR, Section 2423 lists a diesel particulate emission standard of 0.15 g/bhp-hr (with 1.341 bhp/kW, equivalent to 0.20 g/kW-hr) for 2001 - 2005 model year engines with maximum power ratings of 301.7 - 603.4 bhp (equivalent to bhp 225 - 450 kW). The PM standards given in Title 13 CCR, Section 2423 are equivalent to the PM standards given in Title 17 CCR, Section 93115 (ATCM), thus the ATCM standards are the required standards and will be discussed in the following section.

Title 17 CCR, Section 93115, (e)(2)(A)(3)(b) stipulates that new stationary emergency standby diesel-fueled CI engines (> 50 bhp) must meet the VOC + NO_x, and CO standards for off-road engines of the same model year and maximum rated power as specified in the Off-Road Compression-Ignition Engine Standards (Title 13 CCR, Section 2423) or the Tier 1 standards for an off-road engine if no standards have been established for an off-road engine of the same model year and maximum rated power.

The engine involved with this project is a certified 2003 model engine. The following table compares the requirements of Title 13 CCR, Section 2423 to the emissions factors for the 483 bhp Caterpillar model #3456 diesel-fired emergency standby IC engine as given by the manufacturer.

Requirements of Title 13 CCR, Section 2423							
Source	Maximum Rated Power	Model Year	NO _x	VOC	NO _x + VOC	CO	PM
Title 13 CCR, §2423	301.7 – 603.4 bhp (225 - 450 kW)	1996-2001 (Tier 1)	6.9 g/bhp-hr (9.2 g/kW-hr)	1.0 g/bhp-hr (1.3 g/kW-hr)	--	8.5 g/bhp-hr (11.4 g/kW-hr)	0.40 g/bhp-hr (0.54 g/kW-hr)
Title 13 CCR, §2423	301.7 – 603.4 bhp (225 - 450 kW)	2001-2005 (Tier 2)	--	--	4.8 g/bhp-hr (6.4 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
Title 13 CCR, §2423	301.7 – 603.4 bhp (225 - 450 kW)	2006 and later (Tier 3)	--	--	3.0 g/bhp-hr (4.0 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
Caterpillar, Model # 3456	483 bhp	2003	--	--	4.8 g/bhp-hr (6.4 g/kW-hr)	2.6 g/bhp-hr (3.5 g/kW-hr)	0.15 g/bhp-hr (0.20 g/kW-hr)
Meets Standard?			N/A	N/A	Yes	Yes	Yes

As presented in the table above, the proposed engine will satisfy the requirements of this section and compliance is expected.

S-7764-1:

- {edited 3485} Emissions from this IC engine shall not exceed any of the following limits: 6.86 g-NO_x/bhp-hr, 8.50 g-CO/bhp-hr, or 0.97 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
- {edited 3486} Emissions from this IC engine shall not exceed 0.37 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

S-7875-1:

- {edited 3485} Emissions from this IC engine shall not exceed any of the following limits: 4.53 g-NO_x/bhp-hr, 2.61 g-CO/bhp-hr, or 0.24 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
- {edited 3486} Emissions from this IC engine shall not exceed 0.15 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

Right of the District to Establish More Stringent Standards:

This regulation also stipulates that the District:

1. May establish more stringent diesel PM, NO_x + VOC, VOC, NO_x, and CO emission rate standards; and
2. May establish more stringent limits on hours of maintenance and testing on a site-specific basis; and
3. Shall determine an appropriate limit on the number of hours of operation for demonstrating compliance with other District rules and initial start-up testing

The District has not established more stringent standards at this time. Therefore, the standards previously established in this Section will be utilized.

Title 17 California Code of Regulations (CCR), Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines

Emergency Operating Requirements:

This regulation stipulates that no owner or operator shall operate any new or in-use stationary diesel-fueled compression ignition (CI) emergency standby engine, in response to the notification of an impending rotating outage, unless specific criteria are met.

This section applies to emergency standby IC engines that are permitted to operate during non-emergency conditions for the purpose of providing electrical power. However, District Rule 4702 states that emergency standby IC engines may only be operated during non-emergency conditions for the purposes of maintenance and testing. Therefore, this section does not apply and no further discussion is required.

Fuel and Fuel Additive Requirements:

This regulation also stipulates that as of January 1, 2006 an owner or operator of a new or in-use stationary diesel-fueled CI emergency standby engine shall fuel the engine with CARB Diesel Fuel.

Since the engines involved with this project are new or in-use stationary diesel-fueled CI emergency standby engine, these fuel requirements are applicable. Therefore, the following condition (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {3395} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]

At-School and Near-School Provisions:

This regulation stipulates that no owner or operator shall operate a new stationary emergency standby diesel-fueled CI engine, with a PM₁₀ emissions factor > than 0.01 g/bhp-hr, for non-emergency use, including maintenance and testing, during the following periods:

1. Whenever there is a school sponsored activity, if the engine is located on school grounds, and
2. Between 7:30 a.m. and 3:30 p.m. on days when school is in session, if the engine is located within 500 feet of school grounds.

S-7764-1:

The District has verified that the engine is located within 500 feet of a K-12 school and that the PM₁₀ emissions factor for the engine is > 0.01 g/bhp-hr. Therefore, the following condition will be listed on the ATC to ensure compliance:

- {3392} This engine shall not be operated for maintenance and testing purposes between 7:30 a.m. and 3:30 p.m. on days when school is in session. [17 CCR 93115]

S-7875-13:

The District has verified that the engine is not located within 500 feet of a K-12 school. Therefore, conditions prohibiting non-emergency usage of the engine during school hours will not be placed on the permit.

Recordkeeping Requirements:

This regulation stipulates that as of January 1, 2005, each owner or operator of an emergency standby diesel-fueled CI engine shall keep a monthly log of usage that shall list and document the nature of use for each of the following:

- a. Emergency use hours of operation;
- b. Maintenance and testing hours of operation;
- c. Hours of operation for emission testing;
- d. Initial start-up hours; and

- e. If applicable, hours of operation to comply with the testing requirements of National Fire Protection Association (NFPA) 25 — "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 1998 edition;
- f. Hours of operation for all uses other than those specified in sections 'a' through 'd' above; and
- g. For in-use emergency standby diesel-fueled engines, the fuel used. The owner or operator shall document fuel use through the retention of fuel purchase records that account for all fuel used in the engine and all fuel purchased for use in the engine, and, at a minimum, contain the following information for each individual fuel purchase transaction:
 - I. Identification of the fuel purchased as either CARB Diesel, or an alternative diesel fuel that meets the requirements of the Verification Procedure, or an alternative fuel, or CARB Diesel fuel used with additives that meet the requirements of the Verification Procedure, or any combination of the above;
 - II. Amount of fuel purchased;
 - III. Date when the fuel was purchased;
 - IV. Signature of owner or operator or representative of owner or operator who received the fuel; and
 - V. Signature of fuel provider indicating fuel was delivered.

The engines associated with this project are considered in-use emergency standby engine powering electrical generators. Therefore, the following conditions (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {3479} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
- {3476} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. For units at unstaffed sites or operated remotely, records may be maintained and retained at a District-approved off-site location. [District Rule 4702 and 17 CCR 93115]

PM Emissions and Hours of Operation Requirements for Modified "In-Use" Diesel Engines:

Engines that have a signed purchase agreement prior to January 1, 2005 are considered to be "in-use" engines per the ATCM. The engines involved with this project have a signed purchase agreement dated before January 1, 2005 and will be considered "in-use" engines for compliance with the ATCM.

This regulation stipulates that as of January 1, 2008, no person that owns three or fewer in-use engines shall operate any in-use stationary emergency standby diesel-fueled CI engine that has a rated brake horsepower greater than 50, is being physically modified, and that was manufactured from 1995 to current, unless it meets the following applicable emission standards and operating requirements.

S-7764-1:

1. Emits diesel PM at a rate greater than 0.15 g/bhp-hr or less than or equal to 0.40 g/bhp-hr; and
2. Does not operate more than 21 to 30 hours per year for maintenance and testing purposes after January 1, 2008. Engine operation is not limited during emergency use and during emissions source testing to show compliance with the ATCM.

Therefore, the following conditions (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {edited 3486} Emissions from this IC engine shall not exceed 0.37 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
- {3811} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 21 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

S-7875-1:

1. Emits diesel PM at a rate greater than 0.01 g/bhp-hr or less than or equal to 0.15 g/bhp-hr; and
2. Does not operate more than 31 to 50 hours per year for maintenance and testing purposes after January 1, 2008. Engine operation is not limited during emergency use and during emissions source testing to show compliance with the ATCM.

Therefore, the following conditions (previously proposed in this engineering evaluation) will be listed on the ATC to ensure compliance:

- {edited 3486} Emissions from this IC engine shall not exceed 0.15 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
- {3810} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702 and 17 CCR 93115]

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001.

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Consistent with California Environmental Quality Act (CEQA) and CEQA Guidelines requirements, the San Joaquin Valley Air Pollution Control District (District) has adopted procedures and guidelines for implementing CEQA. The District's Environmental Review Guidelines (ERG) establishes procedures for avoiding unnecessary delay during the District's permitting process while ensuring that significant environmental impacts are thoroughly and consistently addressed. The ERG includes policies and procedures to be followed when processing permits for projects that are exempt under CEQA.

The State Legislature granted a number of exemptions from CEQA, including projects that require only ministerial approval. Based upon analysis of its own laws and consideration of CEQA provisions, the District has identified a limited number of District permitting activities considered to be ministerial approvals. As set forth in §4.2.1 of the ERG, projects permitted consistent with the District's *Guidelines for Expedited Application Review* (GEAR) are standard application reviews in which little or no discretion is used in issuing Authority to Construct (ATC) documents.

For the proposed project, the District performed an Engineering Evaluation (this document) and determined that the project qualifies for processing under the procedures set forth in the District's Permit Services Procedures Manual in the *Guidelines for Expedited Application Review* (GEAR). Thus, as discussed above, this issuance of such ATC(s) is a ministerial approval for the District and is not subject to CEQA provisions.

On December 17, 2009, the District's Governing Board adopted the first comprehensive regional policy and guidance on addressing and mitigating GHG emission impacts caused by industrial, commercial, and residential development in the San Joaquin Valley. The adopted District policy – *Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency* applies to projects for which the District has discretionary approval authority over the project and serves as the lead agency for CEQA purposes. The policy relies on the use of performance based standards, otherwise known as Best Performance Standards (BPS) to assess significance of project specific greenhouse gas emissions on global climate change during the environmental review process, as required by CEQA.

Use of BPS is a method of streamlining the CEQA process of determining significance and is not a required emission reduction measure. However, consistent with the District's objective to achieve the GHG emission reduction targets established pursuant to AB 32, BPS will be incorporated into the District's GEAR application review process. In the interim, projects meeting the existing GEAR requirements will continue to be processed as ministerial approvals.

IX. Recommendation

Pending a successful NSR Public and School Noticing period, issue Authorities to Construct S-7764-1-0 and S-7875-1-0 subject to the permit conditions on the attached draft Authorities to Construct in Appendix D.

X. Billing Information

Billing Schedule			
Permit Number	Fee Schedule	Fee Description	Fee Amount
S-7764-1-0	3020-10-F	530 bhp IC engine	\$607.00
S-7875-1-0	3020-10-F	483 bhp IC engine	\$607.00

Appendices

- A. BACT Guideline and BACT Analysis
- B. Location Maps
- C. HRA Summary and AAQA
- D. Draft ATCs

Appendix A

BACT Guideline and BACT Analysis

San Joaquin Valley Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 3.1.3
Last Update: 6/30/2001
Emergency Diesel IC Engine ≥ 400 hp

Pollutant	Achieved in Practice or in the SIP	Technologically Feasible	Alternate Basic Equipment
CO	2.0 grams/brake horsepower-hour	= or < 1.4 grams/bhp-hr	
NOx	Certified emissions of 6.9 g/bhp-hr or less		
PM10	0.1 grams/bhp-hr (if TBACT is triggered) 0.4 grams/bhp-hr (if TBACT is not triggered)		
SOx	Low-sulfur diesel fuel (500 ppmw sulfur or less) or Very Low-sulfur diesel fuel (15 ppmw sulfur or less), where available.		
VOC	Positive crankcase ventilation		

1. Any engine model included in the ARB or EPA diesel engine certification lists and identified as having a PM10 emission rate of 0.149 grams/bhp-hr or less, based on ISO 8178 test procedure, shall be deemed to meet the 0.1 grams/bhp-hr requirement. 2. A site-specific Health Risk Analysis is used to determine if TBACT is triggered. (Clarification added 05/07/01)

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

Top Down BACT Analysis for the Emergency IC Engine(s)

Oxides of nitrogen (NO_x) are generated from the high temperature combustion of the diesel fuel. A majority of the NO_x emissions are formed from the high temperature reaction of nitrogen and oxygen in the inlet air. The rest of the NO_x emissions are formed from the reaction of fuel-bound nitrogen with oxygen in the inlet air.

1. BACT Analysis for NO_x Emissions:

a. Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse guideline 3.1.3, 2nd quarter 2001, identifies achieved in practice BACT for NO_x emissions from emergency diesel IC engines \geq 400 bhp) as follows:

- 1) Certified emissions of 6.9 g-NO_x/bhp-hr or less

No technologically feasible alternatives or control alternatives identified as alternate basic equipment for this class and category of source are listed.

b. Step 2 - Eliminate technologically infeasible options

There are no technologically infeasible options to eliminate from step 1.

c. Step 3 - Rank remaining options by control effectiveness

No ranking needs to be done because the applicant has proposed the achieved in practice option.

d. Step 4 - Cost Effectiveness Analysis

The applicant has proposed the only control achieved in practice in the ranking list from Step 3. Therefore, per SJVUAPCD BACT policy, the cost effectiveness analysis is not required.

e. Step 5 - Select BACT

BACT for NO_x emissions from these emergency diesel IC engines (\geq 400 bhp) is having certified emissions of 6.9 g-NO_x/bhp-hr or less. The applicant has proposed to install two emergency diesel IC engines rated at 530 and 483 bhp with certified emissions of 6.9 g-NO_x/bhp-hr or less; therefore BACT for NO_x emissions is satisfied.

2. BACT Analysis for PM₁₀ Emissions:

Particulate matter (PM₁₀) emissions occur from the reaction of various elements in the diesel fuel including fuel sulfur.

a. Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse guideline 3.1.3, 2nd quarter 2001, identifies achieved in practice BACT for PM₁₀ emissions from emergency diesel IC engines (≥ 400 bhp) as follows:

- 1) Certified emissions of 0.4 g-PM₁₀/bhp-hr since T-BACT is not triggered for this project or less

No technologically feasible alternatives or control alternatives identified as alternate basic equipment for this class and category of source are listed.

b. Step 2 - Eliminate technologically infeasible options

There are no technologically infeasible options to eliminate from step 1.

c. Step 3 - Rank remaining options by control effectiveness

No ranking needs to be done because the applicant has proposed the achieved in practice option.

d. Step 4 - Cost Effectiveness Analysis

The applicant has proposed the only control achieved in practice in the ranking list from Step 3. Therefore, per SJVUAPCD BACT policy, the cost effectiveness analysis is not required.

e. Step 5 - Select BACT

BACT for PM₁₀ emissions from these emergency diesel IC engines (≥ 400 bhp) is having certified emissions of 0.4 g-PM₁₀/bhp-hr or less. The applicant has proposed to install two emergency diesel IC engines rated at 530 and 483 bhp with certified emissions of 0.4 g-PM₁₀/bhp-hr or less; therefore BACT for PM₁₀ emissions is satisfied.

3. BACT Analysis for VOC Emissions:

Volatile organic compounds (VOC) are emitted from the crankcase of the engine as a result of piston ring blow-by.

a. Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse guideline 3.1.3, 2nd quarter 2001, identifies achieved in practice BACT for VOC emissions from emergency diesel IC engines ≥ 400 bhp) as follows:

- 1) Positive crankcase ventilation (or 90% efficient control device)

No technologically feasible alternatives or control alternatives identified as alternate basic equipment for this class and category of source are listed.

b. Step 2 - Eliminate technologically infeasible options

There are no technologically infeasible options to eliminate from step 1.

c. Step 3 - Rank remaining options by control effectiveness

No ranking needs to be done because the applicant has proposed the achieved in practice option.

d. Step 4 - Cost effectiveness analysis

The applicant has proposed the only control achieved in practice in the ranking list from Step 3. Therefore, per SJVUAPCD BACT policy, the cost effectiveness analysis is not required.

e. Step 5 - Select BACT

BACT for VOC emissions from these emergency diesel IC engines (≥ 400 bhp) is having positive crankcase ventilation (or 90% efficient control device). The applicant has proposed to install two emergency diesel IC engines rated at 530 and 483 bhp with positive crankcase ventilation; therefore BACT for VOC emissions is satisfied.

Appendix B

Location Maps

S-7764-1



1367 FEET mi.
 ∴ ONLY VALLE VERDE ZONE SCHOOL WILL USE NOTICES

OTHER ZONES ARE > 1,000 FT FROM ALL K-12 SCHOOLS

S-7764-2



2,166 ft x 1,000

35°16'19.04" N 119°00'04.36" W

Eye alt 4889 ft

Appendix C

HRA Summary and AAQA

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Kristopher Rickards, AQE - Permit Services
 From: David Garner, AQS - Permit Services
 Date: December 9, 2010
 Facility Name: Greenfield County Water District
 Location: 551 Taft Highway, Bakersfield, CA
 Application #(s): S-7764-1-0
 Project #: S-1100666

A. RMR SUMMARY

RMR Summary			
Categories	Diesel-Fired IC Engine (Unit 1-0)	Project Totals	Facility Totals
Prioritization Score	N/A ¹	N/A ¹	>1.0
Acute Hazard Index	N/A ²	N/A ²	N/A ²
Chronic Hazard Index	N/A ²	N/A ²	N/A ²
Maximum Individual Cancer Risk (10 ⁻⁶)	0.96	0.96	0.96
T-BACT Required?	No		
Special Permit Conditions?	Yes		

- 1 Prioritization for this unit was not conducted since it has been determined that all diesel-fired IC engines will result in a prioritization score greater than 1.0.
- 2 Acute and Chronic Hazard Indices were not calculated since there is no risk factor, or the risk factor is so low that the risk has been determined to be insignificant for this type of unit.

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Unit # 1-0

1. The PM₁₀ emissions rate shall not exceed **0.37 g/hp-hr** based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
2. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102] N
3. The exhaust stack release height shall not be less than **15 feet** above grade. [District Rule 2201]
4. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed **21 hours per year**. [District Rules 2201, and 4702 and 17 CCR 93115] N

B. RMR REPORT

I. Project Description

Technical Services received a request on October 7, 2010, to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for a proposed installation of a 530 hp diesel-fired emergency IC engine powering an electrical generator.

II. Analysis

RMR. Technical Services performed a screening level health risk assessment using the District developed DICE database.

The following parameters were used for the review:

Analysis Parameters Unit 1-0			
Source Type	Point	Location Type	Urban
BHP	530	PM ₁₀ g/hp-hr	0.37
Closest Receptor (m)	19	Quad	Quad 2
Max Hours per Year	21	Type of Receptor	Resident

AAQA. Technical Services performed modeling for criteria pollutants CO, NO_x, SO_x and PM₁₀. The emission rates used for criteria pollutant modeling were 9.9 lb/hr CO, 8.0 lb/hr NO_x, 0.0 lb/hr SO_x, and 0.4 lb/hr PM₁₀.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results¹

Diesel ICE	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	Pass	X	Pass	X	X
NO _x	Pass ²	X	X	X	Pass
SO _x	Pass	Pass	X	Pass	Pass
PM ₁₀	X	X	X	Pass ³	Pass ³

¹Results were taken from the attached PSD spreadsheet.

²The project was compared to the 1-hour NO₂ National Ambient Air Quality Standard that became effective on April 12, 2010 using the District's approved procedures.

³The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

III. Conclusion

RMR. The cancer risk associated with the operation of the proposed diesel IC engine is less than 1.0 in a million. In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT) for PM10.

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit .

AAQA. The emissions from the proposed equipment will not cause or contribute significantly to a violation of the State and National AAQS.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

IV. Attachments

- A. RMR request from the project engineer
- B. DICE output & facility summary
- C. AAQA documentation

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Kristopher Rickards, AQE - Permit Services
 From: David Garner, AQS - Permit Services
 Date: November 2, 2010
 Facility Name: Greenfield County Water District
 Location: Section 32, Township 30S, Range 28E, Greenfield, CA
 Application #(s): S-7875-1-0
 Project #: S-1104552

A. RMR SUMMARY

RMR Summary			
Categories	Diesel-Fired IC Engine (Unit 1-0)	Project Totals	Facility Totals
Prioritization Score	N/A ¹	N/A ¹	>1.0
Acute Hazard Index	N/A ²	N/A ²	N/A ²
Chronic Hazard Index	N/A ²	N/A ²	N/A ²
Maximum Individual Cancer Risk (10 ⁻⁶)	0.85	0.85	0.85
T-BACT Required?	No		
Special Permit Conditions?	Yes		

- 1 Prioritization for this unit was not conducted since it has been determined that all diesel-fired IC engines will result in a prioritization score greater than 1.0.
- 2 Acute and Chronic Hazard Indices were not calculated since there is no risk factor, or the risk factor is so low that the risk has been determined to be insignificant for this type of unit.

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Unit # 1-0

1. The PM10 emissions rate shall not exceed **0.15** g/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
2. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102] N
3. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed **50** hours per year. [District Rules 2201, and 4702 and 17 CCR 93115] N

B. RMR REPORT

I. Project Description

Technical Services received a request on October 7, 2010, to perform a Risk Management Review (RMR) and an Ambient Air Quality Analysis (AAQA) for a proposed installation of a 483 hp diesel-fired emergency IC engine powering an electrical generator.

II. Analysis

RMR. Technical Services performed a screening level health risk assessment using the District developed DICE database.

The following parameters were used for the review:

Analysis Parameters Unit 1-0			
Source Type	Point	Location Type	Urban
BHP	483	PM ₁₀ g/hp-hr	0.15
Closest Receptor (m)	12	Quad	Quad 2
Max Hours per Year	50	Type of Receptor	Resident

AAQA. Technical Services performed modeling for criteria pollutants CO, NO_x, SO_x and PM₁₀. The emission rates used for criteria pollutant modeling were 2.8 lb/hr CO, 4.8 lb/hr NO_x, 0.0 lb/hr SO_x, and 0.16 lb/hr PM₁₀.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results¹

Diesel ICE	1 Hour	3 Hours	8 Hours.	24 Hours	Annual
CO	Pass	X	Pass	X	X
NO _x	Pass ²	X	X	X	Pass
SO _x	Pass	Pass	X	Pass	Pass
PM ₁₀	X	X	X	Pass ³	Pass ³

¹Results were taken from the attached PSD spreadsheet.

²The project was compared to the 1-hour NO₂ National Ambient Air Quality Standard that became effective on April 12, 2010 using the District's approved procedures.

³The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

III. Conclusion

RMR. The cancer risk associated with the operation of the proposed diesel IC engine is less than 1.0 in a million. In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT) for PM10.

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit .

AAQA. The emissions from the proposed equipment will not cause or contribute significantly to a violation of the State and National AAQS.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

IV. Attachments

- A. RMR request from the project engineer
- B. DICE output & facility summary
- C. AAQA documentation

Appendix D

Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-7764-1-0

LEGAL OWNER OR OPERATOR: GREENFIELD COUNTY WATER DISTRICT

MAILING ADDRESS: 551 TAFT HIGHWAY
BAKERSFIELD, CA 93307

LOCATION: 551 TAFT HIGHWAY
BAKERSFIELD, CA 93307

SECTION: 30 TOWNSHIP: 30S RANGE: 28E

EQUIPMENT DESCRIPTION:

530 BHP CATERPILLAR MODEL 3406 TIER 1 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING AN ELECTRICAL GENERATOR (BERKSHIRE)

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. {3395} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]
5. {3403} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115]
6. {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
7. {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

S-7764-1-0: Dec 16 2010 10:53AM - RICKARDK : Joint Inspection NOT Required

8. {3476} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. For units at unstaffed sites or operated remotely, records may be maintained and retained at a District-approved off-site location. [District Rule 4702 and 17 CCR 93115]
9. {3392} This engine shall not be operated for maintenance and testing purposes between 7:30 a.m. and 3:30 p.m. on days when school is in session. [17 CCR 93115]
10. {1897} This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
11. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
12. The exhaust stack release height shall not be less than 15 feet above grade. [District Rule 4102]
13. {3405} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
14. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
15. {3479} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
16. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 21 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
17. {3415} The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115]
18. Emissions from this IC engine shall not exceed any of the following limits: 6.86 g-NOx/bhp-hr, 8.50 g-CO/bhp-hr, or 0.97 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
19. Emissions from this IC engine shall not exceed 0.37 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-7875-1-0

LEGAL OWNER OR OPERATOR: GREENFIELD COUNTY WATER DISTRICT
MAILING ADDRESS: 551 TAFT HIGHWAY
BAKERSFIELD, CA 93307

LOCATION: S 32, T 30S, R 28E
GREENFIELD, CA

EQUIPMENT DESCRIPTION:
483 BHP CATERPILLAR MODEL 3456 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING AN ELECTRICAL GENERATOR (PANAMA)

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. {3395} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115]
5. {3403} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115]
6. {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
7. {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
8. {3476} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. For units at unstaffed sites or operated remotely, records may be maintained and retained at a District-approved off-site location. [District Rule 4702 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

S-7875-1-0 : Dec 16 2010 10:53AM - RICKARDK : Joint Inspection NOT Required

9. {1897} This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
10. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
11. {3405} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
12. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
13. {3479} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
14. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
15. {3415} The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115]
16. Emissions from this IC engine shall not exceed any of the following limits: 4.53 g-NO_x/bhp-hr, 2.61 g-CO/bhp-hr, or 0.24 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
17. Emissions from this IC engine shall not exceed 0.15 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]

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