



JUL 18 2012

Columbia Ozuna
Caterpillar Logistics Inc.
500 N. Morton Ave. MT230
Morton, IL 61550

Re: Notice of Preliminary Decision - Authority to Construct
Project Number: S-1121267

Dear Ms. Ozuna:

Enclosed for your review and comment is the District's analysis of Caterpillar Logistics Inc.'s application for an Authority to Construct for the installation of a 1,207 bhp (intermittent) diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator. In addition, the applicant proposes the installation of a 157 bhp (intermittent) diesel-fired emergency internal combustion (IC) engine powering a firewater pump, at 5904 Santa Elena Drive, in Arvin CA.

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. William Jones of Permit Services at (661)-392-5610.

Sincerely,

David Warner
Director of Permit Services

DW:WEJ/st

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
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JUL 18 2012

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-1121267

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Caterpillar Logistics Inc.'s application for an Authority to Construct for the installation of a 1,207 bhp (intermittent) diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator. In addition, the applicant proposes the installation of a 157 bhp (intermittent) diesel-fired emergency internal combustion (IC) engine powering a firewater pump, at 5904 Santa Elena Drive, in Arvin CA.

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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 Caterpillar Logistics Inc. for the installation of a 1,207 bhp (intermittent) diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator. In addition, the applicant proposes the installation of a 157 bhp (intermittent) diesel-fired emergency internal combustion (IC) engine powering a firewater pump, at 5904 Santa Elena Drive, in Arvin CA.

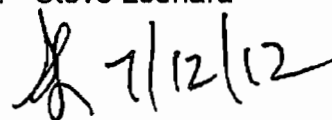
The analysis of the regulatory basis for this proposed action, Project #S-1121267, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. Written comments on this project must be submitted within 30 days of the publication 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 Engine**

Facility Name: Caterpillar Logistics Inc.
Mailing Address: 500 N. Morton Ave., MT230
Morton, IL 61550

Date: 7/12/12
Engineer/ Specialist: William Jones
Lead Engineer: Steve Leonard

Contact Person: Columbia J Ozuna
Telephone: 309-266-3639
Application #: S-8157-1-0, "-2-0
Project #: S-1121267
Complete: 4/31/12

 7/12/12

I. Proposal

Caterpillar Logistics Inc is proposing to install a 1,207 bhp (intermittent) diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator. In addition, the applicant proposes the installation of a 157 bhp (intermittent) diesel-fired emergency internal combustion (IC) engine powering a firewater pump.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emission Standards for Hazardous Air Pollutants (5/20/04)
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 (8/18/11)
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 project is located at 5904 Santa Elena Drive, in Arvin CA.

The District has verified that the equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

S-8157-1-0

The emergency standby engine powers an electrical generator. Other than emergency standby operation, the engine may be operated up to 50 hours per year for maintenance and testing purposes.

S-8157-2-0

The emergency engine powers a firewater pump. Other than emergency operation, the engine may be operated up to 26 hours per year for maintenance and testing purposes.

V. Equipment Listing

S-8157-1-0: 1,207 BHP (INTERMITTENT) CATERPILLAR MODEL C27 ATAAC TIER 4 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

S-8157-2-0: 157 BHP (INTERMITTENT) JOHN DEERE CO MODEL 4045 SERIES POWER TECH E TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

VI. Emission Control Technology Evaluation

S-8157-1-0

The applicant has proposed to install a Tier 4 certified diesel-fired IC engine that is fired on very low-sulfur diesel fuel (0.0015% by weight sulfur maximum).

The proposed engine meets the latest Tier Certification requirements; therefore, the engine meets 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.

S-8157-2-0

The engine is equipped with:

- Turbocharger
- Intercooler/aftercooler
- Injection timing retard (or equivalent per District Policy SSP-1805, dated 8/14/1996)
- Positive Crankcase Ventilation (PCV) or 90% efficient control device
- This engine is required to be, and is UL certified
- Catalytic particulate filter
- Very Low (0.0015%) sulfur diesel

The emission control devices/technologies and their effect on diesel engine emissions detailed below are from *Non-catalytic NO_x Control of Stationary Diesel Engines*, by Don Koeberlein, CARB.

The turbocharger reduces the NO_x emission rate from the engine by approximately 10% by increasing the efficiency and promoting more complete burning of the fuel.

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

S-8157-1-0

Emergency operating schedule:	24 hours/day
Non-emergency operating schedule:	50 hours/year
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%
PM ₁₀ fraction of diesel exhaust:	0.96 (CARB, 1988)

S-8157-2-0

Emergency operating schedule:	24 hours/day
Non-emergency operating schedule:	26 hours/year
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%
PM ₁₀ fraction of diesel exhaust:	0.96 (CARB, 1988)

- The applicant has only supplied an emissions factor for NO_x and VOC emissions combined. Therefore the District will use data from the EPA document "Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling – Compressions Ignition", dated November 2002, as presented in the following table to estimate NO_x and VOC emissions (District assumption).

Tier 2 and Tier 3 Diesel-Fired IC Engines NO _x and VOC Estimated Emissions						
Horsepower Range (bhp)	Combined Standard, NO _x + VOC (g/bhp-hr)		Estimated NO _x Emissions (g/bhp-hr)		Estimated VOC Emissions (g/bhp-hr)	
	Tier 2	Tier 3	Tier 2	Tier 3	Tier 2	Tier 3
≥ 50 to < 100	5.6	3.5	5.2	3.3	0.4	0.2
≥ 100 to < 175	4.9	3.0	4.5	2.8	0.4	0.2
≥ 175 to < 300	4.9	3.0	4.5	2.8	0.4	0.2
≥ 300 to < 600	4.8	3.0	4.5	2.8	0.3	0.2
≥ 600 to < 750	4.8	3.0	4.5	2.8	0.3	0.2
≥ 750	4.8	N/A	4.5	N/A	0.3	N/A

For this application for a 320 bhp Tier 3 certified IC engine the applicant supplied NO_x + VOC emissions factor is 3.0 g/bhp-hr. Therefore, the NO_x and VOC emissions factors for this engine are calculated as follows:

$$\text{NO}_x \text{ (g/bhp-hr)} = \text{NO}_x + \text{VOC (g/bhp-hr)} \times (2.8 \text{ g/bhp-hr} \div 3.0 \text{ g/bhp-hr})$$

$$\text{NO}_x \text{ g/bhp-hr} = 3.0 \text{ g/bhp-hr} \times (2.8 \text{ g/bhp-hr} \div 3.0 \text{ g/bhp-hr})$$

$$\text{NO}_x = 2.8 \text{ g/bhp-hr}$$

$$\text{VOC (g/bhp-hr)} = \text{NO}_x + \text{VOC (g/bhp-hr)} \times (0.2 \text{ g/bhp-hr} \div 3.0 \text{ g/bhp-hr})$$

$$\text{VOC g/bhp-hr} = 3.0 \text{ g/bhp-hr} \times (0.2 \text{ g/bhp-hr} \div 3.0 \text{ g/bhp-hr})$$

$$\text{VOC} = 0.2 \text{ g/bhp-hr}$$

B. Emission Factors

S-8157-1-0

Emission Factors		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO _x	3.0	Engine Manufacturer
SO _x	0.0051	Mass Balance Equation Below
PM ₁₀	0.05	ARB/EPA Certification
CO	0.60	ARB/EPA Certification
VOC	0.13	Engine Manufacturer

$$\frac{0.000015 \text{ lb} - S}{\text{lb} - \text{fuel}} \times \frac{7.1 \text{ lb} - \text{fuel}}{\text{gallon}} \times \frac{2 \text{ lb} - SO_2}{1 \text{ lb} - S} \times \frac{1 \text{ gal}}{137,000 \text{ Btu}} \times \frac{1 \text{ bhp input}}{0.35 \text{ bhp out}} \times \frac{2,542.5 \text{ Btu}}{\text{bhp} - \text{hr}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.0051 \frac{\text{g} - SO_x}{\text{bhp} - \text{hr}}$$

S-8157-2-0

Emission Factors		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO _x	2.8	Engine Manufacturer
SO _x	0.0051	Mass Balance Equation Below
PM ₁₀	0.22	ARB/EPA Certification
CO	3.7	AP-42 (10/96) Table 3.3-1
VOC	0.2	AP-42 (10/96) Table 3.3-1 ¹

$$\frac{0.000015 \text{ lb} - S}{\text{lb} - \text{fuel}} \times \frac{7.1 \text{ lb} - \text{fuel}}{\text{gallon}} \times \frac{2 \text{ lb} - SO_2}{1 \text{ lb} - S} \times \frac{1 \text{ gal}}{137,000 \text{ Btu}} \times \frac{1 \text{ bhp input}}{0.35 \text{ bhp out}} \times \frac{2,542.5 \text{ Btu}}{\text{bhp} - \text{hr}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.0051 \frac{\text{g} - SO_x}{\text{bhp} - \text{hr}}$$

C. Calculations

1. Pre-Project Emissions (PE1)

S-8157-1-0

Since this is a new emissions unit, PE1 = 0.

S-8157-2-0

Since this is a new emissions unit, PE1 = 0.

2. Post-Project PE (PE2)

S-8157-1-0

The daily and annual PE are calculated as follows:

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	3.00	1207	24	50	191.6	399
SO _x	0.0051	1207	24	50	0.3	1
PM ₁₀	0.15	1207	24	50	9.6	20
CO	0.60	1207	24	50	38.3	80
VOC	0.13	1207	24	50	8.3	17

S-8157-2-0

The daily and annual PE are calculated as follows:

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	2.80	157	24	26	23.3	25
SO _x	0.0051	157	24	26	0.0	0
PM ₁₀	0.22	157	24	26	1.8	2
CO	3.70	157	24	26	30.7	33
VOC	0.20	157	24	26	1.7	2

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, **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.

For this project the change in emissions for the facility is due to the installation of the new emergency standby IC engine(s), permit units -1-0 and -2-0. Thus:

SSPE2					
Permit Unit	NO _x (lb/yr)	SO _x (lb/yr)	PM ₁₀ (lb/yr)	CO (lb/yr)	VOC (lb/yr)
SSPE1	0	0	0	0	0
S-8157-1-0	399	1	20	80	17
S-8157-2-0	25	0	2	33	2
SSPE2 Total	424	1	22	113	19
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offset Threshold Surpassed?	No	No	No	No	No

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.

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	424	20,000	No	No
SO _x	0	1	140,000	No	No
PM ₁₀	0	22	140,000	No	No
CO	0	113	200,000	No	No
VOC	0	19	20,000	No	No

As seen in the table above, the facility is not an existing Major Source and also is 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 3.23

Since this is a new emissions unit, BE = PE1 = 0 for all criteria pollutants.

7. SB 288 Major Modification

SB 288 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 above, this facility is not a major source for any of the pollutants addressed in this project; therefore, the project does not constitute a SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201, Section 3.18 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this facility is not a Major Source for any pollutants, this project does not constitute a Federal Major Modification. Additionally, since the facility is not a major source for PM₁₀ (140,000 lb/year), it is not a major source for PM_{2.5} (200,000 lb/year).

9. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix E.

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 an SB288 Major Modification or a Federal Major Modification, as defined by the rule.

*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

As discussed in Section I, the facility is proposing to install a new emergency standby IC engine. Additionally, as determined in Sections VII.C.7 and VII.C.8, this project does not result in an SB288 Major Modification or a Federal Major Modification, respectively. Therefore, BACT can only be triggered if the daily emissions exceed 2.0 lb/day for any pollutant.

S-8157-1-0

The daily emissions from the new engine are compared to the BACT threshold levels in the following table:

New Emissions Unit BACT Applicability				
Pollutant	Daily Emissions for unit -1-0 (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
NO _x	191.6	> 2.0	n/a	Yes
SO _x	0.3	> 2.0	n/a	No
PM ₁₀	9.6	> 2.0	n/a	Yes
CO	38.3	> 2.0 and SSPE2 ≥ 200,000 lb/yr	80	No
VOC	8.3	> 2.0	n/a	Yes

As shown above, BACT will be triggered for NO_x, PM₁₀, and VOC emissions from the engine for this project.

S-8157-2-0

Since this engine is a new emissions unit, the daily emissions are compared to the BACT thresholds in the following table:

New Emissions Unit BACT Applicability				
Pollutant	Daily Emissions for unit -2-0 (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
NO _x	23.3	> 2.0	n/a	Yes
SO _x	0.0	> 2.0	n/a	No
PM ₁₀	1.8	> 2.0	n/a	No
CO	30.7	> 2.0 and SSPE2 ≥ 200,000 lb/yr	33	No
VOC	1.7	> 2.0	n/a	No

Thus BACT will be triggered for NO_x, emissions from the engine for this project.

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

As discussed previously in Section I, the proposed 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, this engine is 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.

2. BACT Guideline

S-8157-1-0

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

S-8157-2-0

BACT Guideline 3.1.4, 2nd quarter 2001, which appears in Appendix B of this report, covers diesel-fired emergency IC engines powering a firewater pump.

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."

S-8157-1-0

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

- NO_x: Latest EPA Tier Certification level for applicable horsepower range
- VOC: Latest EPA Tier Certification level for applicable horsepower range
- PM₁₀: 0.15 g/hp-hr or the Latest EPA Tier Certification level for applicable horsepower range, whichever is more stringent. (ATCM)

The following condition(s) will be listed on the ATC to ensure compliance with the PM₁₀ BACT emissions limit(s):

- Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, 40 CFR Part 60 Subpart IIII]

S-8157-2-0

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

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

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

- {edited 3485} Emissions from this IC engine shall not exceed any of the following limits: 2.8 g-NO_x/bhp-hr, 3.7 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 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, SB288 Major Modifications, Federal Major Modifications

As shown in Sections VII.C.5, VII.C.7, and VII.C.8, this facility is not a new Major Source, not an SB 288 Major Modification, and not a Federal Major Modification, respectively.

- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant

S-8157-1-0

calculated in Section VII.C.2, daily emissions for NO_x are greater than 100 lb./day.

S-8157-2-0

As calculated in Section VII.C.2, daily emissions for all pollutants are less than 100 lb./day

As seen above public noticing is required for this project.

- c. Any project which results in the offset thresholds being surpassed

As shown in Section VII.C.4, an offset threshold will not be surpassed.

- d. Any project with a Stationary Source Project Increase in Permitted Emissions (SSIPE) greater than 20,000 lb/year for any pollutant.

For this project, the proposed engine is the only emissions source that will generate an increase in Potential to Emit. Since the proposed engine emissions are well below 20,000 lb/year for all pollutants (See Section VII.C.2), the SSIPE for this project will be below the public notice threshold.

2. Public Notice Action

As demonstrated above, this project will require public noticing. 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(s) for this equipment.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.16 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.16.1 and 3.16.2, 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. Therefore, the following conditions will be listed on the ATC to ensure compliance:

S-8157-1-0

- Emissions from this IC engine shall not exceed any of the following limits: 3.0 g-NOx/bhp-hr, 0.60 g-CO/bhp-hr, or 0.13 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]
- Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]
- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]

S-8157-2-0

- Emissions from this IC engine shall not exceed any of the following limits: 2.8 g-NOx/bhp-hr, 3.7 g-CO/bhp-hr, or 0.20 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]
- Emissions from this IC engine shall not exceed 0.22 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]

- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]

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 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 (AAQA)

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 an air quality standard. The Technical Services Division of the SJVAPCD conducted the required analysis.

As shown by the AAQA summary sheet in Appendix D, the proposed equipment will not cause or make worse a violation of an air quality standard for VOC, NO_x, CO, PM₁₀, or SO_x.

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.

Rule 4001 New Source Performance Standards (NSPS)

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

The following table demonstrates how the proposed engine(s) will comply with the requirements of 40 CFR Part 60 Subpart IIII.

40 CFR 60 Subpart IIII Requirements for New Emergency IC Engines Powering Generators (2007 and Later Model Year)	Proposed Method of Compliance with 40 CFR 60 Subpart IIII Requirements
Engine(s) must meet the appropriate Subpart IIII emission standards for new engines, based on the model year, size, and number of liters per cylinder.	The applicant has proposed the use of engine(s) that are certified to the latest EPA Tier Certification level for the applicable horsepower range, guaranteeing compliance with the emission standards of Subpart IIII.
Engine(s) must be fired on 500 ppm sulfur content fuel or less, and fuel with a minimum centane index of 40 or a maximum aromatic content of 35 percent by volume. Starting in October 1, 2010, the maximum allowable sulfur fuel content will be lowered to 15 ppm.	The applicant has proposed the use of CARB certified diesel fuel, which meets all of the fuel requirements listed in Subpart IIII. A permit condition enforcing this requirement was included earlier in this evaluation.
The operator/owner must install a non-resettable hour meter prior to startup of the engine(s).	The applicant has proposed to install a non-resettable hour meter. The following condition will be included on the permit: <ul style="list-style-type: none"> This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII]
Emergency engine(s) may be operated for the purpose of maintenance and testing up to 100 hours per year. There is no limit on emergency use.	The Air Toxic Control Measure for Stationary Compression Ignition Engines (Stationary ATCM) limits this engine maintenance and testing to 50 hours/year. Thus, compliance is expected.
The owner/operator must operate and maintain the engine(s) and any installed control devices according to the manufacturers written instructions.	The following condition will be included on the permit: <ul style="list-style-type: none"> 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 and 40 CFR 60 Subpart IIII]

Rule 4002 National Emission Standards for Hazardous Air Pollutants

40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Emissions (RICE)

Emergency engines are subject to this subpart if they are operated at a major or area source of Hazardous Air Pollutant (HAP) emissions. A major source of HAP emissions is a facility that has the potential to emit any single HAP at a rate of 10 tons/year or greater or any combinations of HAPs at a rate of 25 tons/year or greater. An area source of HAPs is a facility is not a major source of HAPs. The proposed engine(s) are new stationary RICE located at an area source of HAP emissions; therefore, these engines are subject to this Subpart.

40 CFR 63 Subpart ZZZZ requires the following engines to comply with 40 CFR 60 Subpart IIII:

1. New emergency engines located at area sources of HAPs
2. Emergency engines rated less than or equal to 500 bhp and located at major sources of HAPs

The proposed engine(s) will be in compliance with 40 CFR 60 Subpart IIII.

Additionally, 40 CFR 63 Subpart ZZZZ requires engines rated greater 500 bhp and located at major sources of HAPs to meet the notification requirements of §63.6645(h); however, that section only applies if an initial performance test is required. Since an initial performance test is not required for emergency engines, the notification requirement is not applicable.

The proposed engines are expected to be in compliance with 40 CFR 63 Subpart ZZZZ.

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, a risk management review (RMR) was performed for this project. The RMR results are summarized in the following table, and can be seen in detail in Appendix D.

RMR Results				
Unit	Acute Hazard Index	Chronic Hazard Index	Cancer Risk	T-BACT Required?
S-8157-1-0 and -2-0	N/A	N/A	0.1 in a million	No

The following conditions will be listed on the ATC to ensure compliance with the RMR:

Unit 1-0

1. The PM10 emissions rate shall not exceed **0.05 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

Unit 2-0

1. The PM10 emissions rate shall not exceed **0.22 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 **26 hours per year**. [District Rules 2201, and 4702 and 17 CCR 93115] N

Rule 4201 Particulate Matter Concentration

Rule 4201 limits particulate matter emissions from any single source operation to 0.1 g/dscf, which, as calculated below, is equivalent to a PM₁₀ emission factor of 0.4 g-PM₁₀/bhp-hr.

$$0.1 \frac{\text{grain-PM}}{\text{dscf}} \times \frac{\text{g}}{15.43\text{grain}} \times \frac{1 \text{ Btu}_{in}}{0.35 \text{ Btu}_{out}} \times \frac{9,051\text{dscf}}{10^6 \text{ Btu}} \times \frac{2,542.5 \text{ Btu}}{1 \text{ bhp-hr}} \times \frac{0.96 \text{ g-PM}_{10}}{1 \text{ g-PM}} = 0.4 \frac{\text{g-PM}_{10}}{\text{bhp-hr}}$$

The new engine has a PM₁₀ emission factor less than 0.4 g/bhp-hr. Therefore, compliance is expected and the following condition will be listed on the ATC:

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

Rule 4701 Internal Combustion Engines – Phase 1

The purpose of this rule is to limit the emissions of nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. Except as provided in Section 4.0, the provisions of this rule apply to any internal combustion engine, rated greater than 50 bhp, that requires a PTO.

The proposed engine(s) are also subject to District Rule 4702, Internal Combustion Engines. Since emissions limits of District Rule 4702 and all other requirements are equivalent or more stringent than District Rule 4701 requirements, compliance with District Rule 4702 requirements will satisfy requirements of District Rule 4701.

Rule 4702 Internal Combustion Engines

The following table demonstrates how the proposed engine(s) will comply with the requirements of District Rule 4702.

District Rule 4702 Requirements Emergency Standby IC Engines	Proposed Method of Compliance with District Rule 4702 Requirements
Operation of emergency standby engines is limited to 100 hours or less per calendar year for non-emergency purposes, verified through the use of a non-resettable elapsed operating time meter.	The Air Toxic Control Measure for Stationary Compression Ignition Engines (Stationary ATCM) limits this engine maintenance and testing to 50 hours/year. Thus, compliance is expected.
Emergency standby engines cannot be used to reduce the demand for electrical power when normal electrical power line service has not failed, or to produce power for the electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract.	<p>The following conditions will be included on the permit:</p> <ul style="list-style-type: none"> • {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]
The owner/operator must operate and maintain the engine(s) and any installed control devices according to the manufacturers written instructions.	A permit condition enforcing this requirement was shown earlier in the evaluation.
The owner/operator must monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.	<p>The following condition will be included on the permit:</p> <ul style="list-style-type: none"> • {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]
Records of the total hours of operation of the emergency standby engine, type of fuel used, purpose for operating the engine, all hours of non-emergency and	<p>The following conditions will be included on the permit:</p> <ul style="list-style-type: none"> • {3496} The permittee shall maintain monthly

<p>emergency operation, and support documentation must be maintained. All records shall be retained for a period of at least five years, shall be readily available, and be made available to the APCO upon request.</p>	<p>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]</p> <ul style="list-style-type: none"> • The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] • {3475} 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. [District Rule 4702 and 17 CCR 93115]
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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

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

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

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

- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 60 Subpart III]

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

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

The following table demonstrates how the proposed engine(s) will comply with the requirements of Title 17 CCR Section 93115.

Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators	Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements
Emergency engine(s) must be fired on CARB diesel fuel, or an approved alternative diesel fuel.	The applicant has proposed the use of CARB certified diesel fuel. The proposed permit condition, requiring the use of CARB certified diesel fuel, was included earlier in this evaluation.
The engine(s) must emit diesel PM at a rate less than or equal to 0.15 g/bhp-hr or must meet the diesel PM standard, as specified in the Off-road compression ignition standards for off-road engines with the same maximum rated power (Title 13 CCR, Section 2423).	The applicant has proposed the use of engine(s) that are certified to the latest EPA Tier Certification level for the applicable horsepower range, guaranteeing compliance with the emission standards of Subpart III. Additionally, the proposed diesel PM emissions rate is less than or equal to 0.15 g/bhp-hr.
The engine may not be operated more than 50 hours per year for maintenance and testing purposes.	The following condition will be included on the permit: <ul style="list-style-type: none"> • 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, 17 CCR 93115 and 40 CFR Part 60 Subpart III]
New stationary emergency standby diesel-fueled CI engines (> 50 bhp) must meet the 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).	The applicant has proposed the use of engine(s) that are certified to the latest EPA Tier Certification level for the applicable horsepower range.
Engines, with a PM10 emissions rate	The District has verified that this engine is not located

<p>greater than 0.01 g/bhp-hr and located at schools, may not be operated for maintenance and testing whenever there is a school sponsored activity on the grounds. Additionally, engines located within 500 feet of school grounds may not be operated for maintenance and testing between 7:30 AM and 3:30 PM</p>	<p>within 500' of a school.</p>
<p>An owner or operator shall maintain monthly records of the following: emergency use hours of operation; maintenance and testing hours of operation; hours of operation for emission testing; initial start-up testing hours; hours of operation for all other uses; and the type of fuel used. All records shall be retained for a minimum of 36 months.</p>	<p>Permit conditions enforcing these requirements were shown earlier in the evaluation.</p>

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.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project qualifies for ministerial approval under the District's Guideline for Expedited Application Review (GEAR). Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Pending a successful NSR Public Noticing period, issue Authority to Construct S-8157-1-0 and S-8157-2-0 subject to the permit conditions on the attached draft Authority to Construct in Appendix A.

X. Billing Information

Billing Schedule			
Permit Number	Fee Schedule	Fee Description	Fee Amount
S-8157-1-0	3020-10-F	1,207 bhp IC engine	\$749.00
S-8157-2-0	3020-01-D	157 bhp IC engine	\$117.00

Appendixes

- A. Draft ATC and Emissions Profile
- B. BACT Guideline and BACT Analysis
- C. Emissions Data Sheet
- D. HRA Summary and AAQA
- E. QNEC Calculations

Appendix A
Draft ATC and Emissions Profile

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-8157-1-0

LEGAL OWNER OR OPERATOR: CATERPILLAR LOGISTICS INC.
MAILING ADDRESS: 500 N. MORTON AVENUE MT230
MORTON, IL 61550

LOCATION: 5904 SANTA ELENA DRIVE
ARVIN, CA

EQUIPMENT DESCRIPTION:
ONE 1,207 BHP CATERPILLAR MODEL C 27 ATAAC, TIER 4 INTERIM CERTIFIED DIESEL-FIRED EMERGENCY
STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

CONDITIONS

1. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. {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]
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {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]
5. {4257} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII]
6. {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart IIII]
7. Emissions from this IC engine shall not exceed any of the following limits: 3.0 g-NOx/bhp-hr, 0.60 g-CO/bhp-hr, or 0.13 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]
8. Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]
9. {4261} 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 and 40 CFR 60 Subpart IIII]

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

DRAFT

DAVID WARNER, Director of Permit Services

S-8157-1-C; JUN 12 2012 2:40PM - JONEGW : Joint Inspection NOT Required

10. {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]
11. {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]
12. {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]
13. {3496} 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. {4262} 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, 17 CCR 93115 and 40 CFR Part 60 Subpart III]
15. {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
16. {3475} 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. [District Rule 4702 and 17 CCR 93115]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-8157-2-0

LEGAL OWNER OR OPERATOR: CATERPILLAR LOGISTICS INC.
MAILING ADDRESS: 500 N. MORTON AVENUE MT230
MORTON, IL 61550

LOCATION: 5904 SANTA ELENA DRIVE
ARVIN, CA

EQUIPMENT DESCRIPTION:
157 BHP (INTERMITTENT) PATTERSON MODELJU4H-UFADY8 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC
ENGINE POWERING A FIREWATER PUMP

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. {3404} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
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. {3475} 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. [District Rule 4702 and 17 CCR 93115]
8. {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]

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

DRAFT
DAVID WARNER, Director of Permit Services

S-8157-2-0; Jul 12 2012 2:40PM - JONESW - Joint Inspection NOT Required

9. {3489} 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, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). 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]
10. Emissions from this IC engine shall not exceed any of the following limits: 2.8 g-NOx/bhp-hr, 3.7 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115]
11. Emissions from this IC engine shall not exceed 0.22 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rule 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115]
12. 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 26 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII]

DRAFT

Permit #: S-8157-2-0	Last Updated
Facility: CATERPILLAR LOGISTICS INC.	07/03/2012 JONESW

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	25.0	0.0	2.0	33.0	2.0
Daily Emis. Limit (lb/Day)	23.3	0.0	1.8	30.7	1.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	6.0	0.0	1.0	8.0	1.0
Q2:	6.0	0.0	1.0	8.0	1.0
Q3:	6.0	0.0	1.0	8.0	1.0
Q4:	6.0	0.0	1.0	8.0	1.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-8157-1-0	Last Updated
Facility: CATERPILLAR LOGISTICS INC.	07/03/2012 JONESW

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	399.0	1.0	20.0	80.0	17.0
Daily Emis. Limit (lb/Day)	191.6	0.3	9.6	38.3	8.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	100.0	1.0	5.0	20.0	4.0
Q2:	100.0	1.0	5.0	20.0	4.0
Q3:	100.0	1.0	5.0	20.0	4.0
Q4:	100.0	1.0	5.0	20.0	4.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Appendix B
BACT Guideline and BACT Analysis

San Joaquin Valley Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 3.1.1 Last Update: 7/10/2009 Emergency Diesel IC Engine

Pollutant	Achieved in Practice or in the SIP	Technologically Feasible	Alternate Basic Equipment
CO	Latest EPA Tier Certification level for applicable horsepower range		
NOX	Latest EPA Tier Certification level for applicable horsepower range		
PM10	0.15 g/hp-hr or the Latest EPA Tier Certification level for applicable horsepower range, whichever is more stringent. (ATCM)		
SOX	Very low sulfur diesel fuel (15 ppmw sulfur or less)		
VOC	Latest EPA Tier Certification level for applicable horsepower range		

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.

**Best Available Control Technology (BACT) Guideline 3.1.4
Last Update: 6/30/2001**

Emergency Diesel I.C. Engine Driving a Fire Pump

Pollutant	Achieved in Practice or in the SIP	Technologically Feasible	Alternate Basic Equipment
CO		Oxidation Catalyst	
NOx	Certified NOx emissions of 6.9 g/bhp-hr or less		
PM10	0.1 grams/bhp-hr (if TBACT is triggered) (corrected 7/16/01) 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 [unless it voids the Underwriters Laboratories (UL) certification]	Catalytic Oxidation	

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.

This is a Summary Page for this Class of Source. For background information, see Permit Specific BACT Determinations on Details Page.

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

BACT Guideline 3.1.1 (July 10, 2009) applies to emergency diesel IC engines. In accordance with the District BACT policy, information from that guideline will be utilized without further analysis.

1. BACT Analysis for NO_x, and VOC Emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

- *Latest EPA Tier Certification level for applicable horsepower range*

To determine the latest applicable Tier level, the following EPA and state regulations were consulted:

- 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 40 CFR Part 89 – Control of Emissions from New and In-Use Nonroad Compression – Ignition Engines
- 40 CFR Part 1039 – Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines
- Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines

40 CFR Parts 89 and 1039, which apply only to nonroad engines, do not directly apply because the proposed emergency engine(s) do not meet the definition of a nonroad engine. Therefore, only Title 17 CCR, Section 93115 and 40 CFR Part 60 Subpart IIII apply directly to the proposed emergency engine(s).

Title 17 CCR, Section 93115.6(a)(3)(A) (CARB stationary diesel engine ATCM) applies to emergency standby diesel-fired engines and requires that such engines be certified to the emission levels in Table 1 (below). Please note that these levels are at least as stringent or more stringent than the emission levels in 40 CFR Subpart IIII.

Table 1: Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines g/bhp-hr (g/kW-hr)					
Maximum Engine Power	Tier	Model Year(s)	PM	NMHC+NOx	CO
50 ≤ HP < 75 (37 ≤ kW < 56)	2	2007	0.15 (0.20)	5.6 (7.5) 3.5 (4.7)	3.7 (5.0)
	4i	2008+			
75 ≤ HP < 100 (56 ≤ kW < 75)	2	2007	0.15 (0.20)	5.6 (7.5) 3.5 (4.7)	3.7 (5.0)
	3	2008+			
100 ≤ HP < 175 (75 ≤ kW < 130)	3	2007	0.15 (0.20)	3.0 (4.0)	3.7 (5.0)
		2008+			
175 ≤ HP < 300 (130 ≤ kW < 225)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
300 ≤ HP < 600 (225 ≤ kW < 450)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
600 ≤ HP ≤ 750 (450 ≤ kW ≤ 560)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
HP > 750 (kW > 560)	2	2007	0.15 (0.20)	4.8 (6.4)	2.6 (3.5)
		2008+			

Additionally, 40 CFR Subpart IIII establishes emission standards for emergency diesel IC engines. These emission standards are the same as those specified in the CARB ATCM, except for engines rated greater than or equal to 50 and less than 75 hp. For such IC engines, the CARB ATCM is more stringent.

Therefore, the most stringent applicable emission standards are those listed in the CARB ATCM (Table 1).

For IC engines rated greater than or equal to 50 hp and less than 75 hp the the higherst Tier required is Tier 4i. For IC engines rated greater than or equal to 75 hp and less than 750 hp the highest Tier required is Tier 3. For engines rated equal to or greater than 750 hp the highest Tier required is Tier 2.

Also, please note that neither the state ATCM nor the Code of Federal Regulations require the installation of IC engines meeting a higher Tier standard than those listed above for emergency applications, due to concerns regarding the effectiveness of the exhaust emissions controls during periods of short-term operation (such as testing operational readiness of an emergency engine).

The proposed engine is rated at 1,207 hp. Therefore, the applicable control technology option is EPA Tier 2 certification.

b. Step 2 - Eliminate technologically infeasible options

The control option listed in Step 1 is not technologically infeasible.

c. Step 3 - Rank remaining options by control effectiveness

No ranking needs to be done because there is only one control option listed in Step 1.

d. Step 4 - Cost Effectiveness Analysis

The applicant has proposed the only control option remaining under consideration. Therefore, a cost effectiveness analysis is not required.

e. Step 5 - Select BACT

BACT for NOx and VOC will be the use of an EPA Tier 2 certified engine. The applicant is proposing such a unit. Therefore, BACT will be satisfied.

2. BACT Analysis for PM₁₀ Emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

- *0.15 g/bhp-hr or the Latest EPA Tier Certification level for applicable horsepower range, whichever is more stringent. (ATCM)*

The latest EPA Tier Certification level for an engine of the proposed model year and horsepower rating is Tier 2. Refer to the Top-Down BACT analysis for NOx for a discussion regarding the determination of the EPA Tier level to be considered.

Please note Tier 2 or 3 IC engines do not have a PM emission standard that is more stringent than 0.15 g/hp-hr. Additionally, the ATCM requires a PM emission standard of 0.15 g/hp-hr for all new emergency diesel IC engines.

Therefore, a PM/PM10 emission standard of 0.15 g/hp-hr is required as BACT.

b. Step 2 - Eliminate technologically infeasible options

The control option listed in Step 1 is not technologically infeasible.

c. Step 3 - Rank remaining options by control effectiveness

No ranking needs to be done because there is only one control option listed in Step 1.

d. Step 4 - Cost Effectiveness Analysis

The applicant has proposed the only control option remaining under consideration. Therefore, a cost effectiveness analysis is not required.

e. Step 5 - Select BACT

BACT for PM10 is emissions of 0.15 g/hp-hr or less. The applicant is proposing an engine that meets this requirement. Therefore, BACT will be satisfied.

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

BACT Guideline 3.1.4 (June 30, 2001) applies to emergency diesel IC engines powering a firewater pump. In accordance with the District BACT policy, information from that guideline will be utilized without further analysis.

1. BACT Analysis for NO_x Emissions:

a. Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse guideline 3.1.4, 2nd quarter 2001, identifies achieved in practice BACT for NO_x emissions from emergency diesel IC engines powering a firewater pump 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 this emergency diesel IC engine powering a firewater pump is having certified emissions of 6.9 g-NO_x/bhp-hr or less. The applicant has proposed to install a 1,207 bhp emergency diesel IC engine powering a firewater pump with certified emissions of 6.9 g-NO_x/bhp-hr or less; therefore BACT for NO_x emissions is satisfied.

Appendix C
Emissions Data Sheet

STANDBY 800 kW 1000 kVA

60 Hz 1800 rpm 480 Volts



SPECIFICATIONS

CAT GENERATOR

Frame	1424
Excitation	IE
Pitch	0.6667
Number of poles	4
Number of leads	6
Number of bearings	Two Bearing
Insulation	Class H
IP rating	Drip proof IP23
Over speed capability - % of rated	125%
Wave form deviation	2 %
Voltage regulator	3 phase sensing with load adjustable module
Voltage regulation	Less than $\pm 1/2\%$ (steady state) Less than $\pm 1/2\%$ (3% speed change)
Telephone Influence Factor	Less than 50
Harmonic Distortion	Less than 5%

CAT DIESEL ENGINE

C27 ATAAC, V-12, 4 stroke, water-cooled diesel

Bore	137.20 mm (5.4 in)
Stroke	152.4 mm (6.0 in)
Displacement	27.03 L (1649.47 in ³)
Compression ratio	16.5:1
Aspiration	TA
Fuel system	Electronic unit injection
Governor Type	ADEM™ A4

CAT EMCP 4 CONTROL PANELS

EMCP 4 controls including:

- Run / Auto / Stop Control
- Speed & Voltage Adjust
- Engine Cycle Crank
- Emergency stop pushbutton

EMCP 4.2 controller features:

- 24-volt DC operation
- Environmental sealed front face
- Text alarm/event descriptions

Digital indication for:

- RPM
- DC volts
- Operating hours
- Oil pressure (psi, kPa or bar)
- Coolant temperature
- Volts (L-L & L-N), frequency (Hz)
- Amps (per phase & average)
- Power Factor (per phase & average)
- kW (per phase, average & percent)
- kVA (per phase, average & percent)
- kVAr (per phase, average & percent)
- kW-hr & kVAr-hr (total)

Warning/shutdown with common LED indication of shutdowns for:

- Low oil pressure
- High coolant temperature
- Overspeed
- Emergency stop
- Failure to start (overcrank)
- Low coolant temperature
- Low coolant level

Programmable protective relaying functions:

- Generator phase sequence
- Over/Under voltage (27/59)
- Over/Under Frequency (81 o/u)
- Reverse Power (kW) (32)
- Reverse Reactive Power (kVAr) (32RV)
- Overcurrent (50/51)

Communications

- Customer data link (Modbus RTU)
- Accessory module data link
- Serial annunciator module data link

- 6 programmable digital inputs
- 4 programmable relay outputs (Form A)
- 2 programmable relay outputs (Form C)
- 2 programmable digital outputs

Compatible with the following optional modules:

- Digital I/O module
- Local Annunciator
- Remote annunciator
- RTD module
- Thermocouple module

Process parameters

Emergency Generator (standby):

Throughput = 58.9 gal/hr @ 100% load (DM8868)
Schedule = 49 hrs/yr maintenance & testing (17 CCR §93115.6)
Fuel Rate = 2,886 gal/yr maximum (PTE) for maintenance & testing operation

Emergency Firewater Pump (standby):

Throughput = 10.6 gal/hr @ 100% load
Schedule = 26 hrs/yr maintenance & testing (NFPA 25 Chapter 5 – 30 minutes per week)
Fuel Rate = 275 gal/yr maximum (PTE) for maintenance & testing operation

Equipment listing

Emergency Generator (standby):

Caterpillar 800 kW; 1000 kVA; 60 Hz; 480 Volts
Caterpillar C27 ATAAC diesel engine
1207 BHP (900 kW) @ 1800 rpm
EPA Tier 4 Interim (performance number DM8868)

Emergency Firewater Pump (standby):

Patterson JU4H-UFADY8; 2000 gal/min @ 90 psig
John Deere 4045 Series Power Tech E diesel engine
157 BHP (117 kW) @ 1760 rpm
EPA Tier 3 (40 CFR 60 NSPS Subpart IIII Table 4)

Identify control equipment/technology

Emergency Generator (standby):

Meets EPA Tier 4 Interim (performance number DM8868)

Emergency Firewater Pump (standby):

Meets EPA Tier 3 (40 CFR 60 NSPS Subpart IIII Table 4)

Emissions information

Emergency Generator, 100% nominal load (CARB Executive Order U-R-001-0443):

NO_x – 3.0 g/BHP-hr
CO – 0.60 g/BHP-hr
HC – 0.13 g/BHP-hr
PM – 0.05 g/BHP-hr

Emergency Firewater Pump, 100% nominal load (40 CFR 60 NSPS Subpart IIII Table 4):

NMHC + NO_x – 3.0 g/BHP-hr
CO – 3.7 g/BHP-hr
PM – 0.22 g/BHP-hr

Applicable application forms

ATC Application - New Emission Units (5904 Santa Elena Drive, Arvin)
Emergency/Low-Use ICE for Non-Ag Operations (generator)
Emergency/Low-Use ICE for Non-Ag Operations (firewater pump)
Assignment of Agent (fiduciary form)

Application fees

We have determined the following SJVAPCD permit application fees:

Rule 3010 ATC fee: 2 emissions units @ \$71 each = \$142

Rule 3020 generator PTO fee: 500-1000 kW = \$766

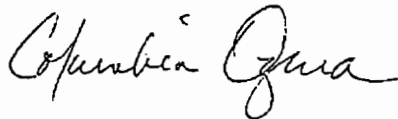
Rule 3020 ICE (firepump) PTO fee: 100-200 BHP = \$117

Total Fee = \$1025.00 payable to San Joaquin Valley Air Pollution Control District

Due to the simplicity of this ATC, Caterpillar anticipates a timely completeness review and processing in order to install the subject equipment on July 30, 2012.

Caterpillar is fully committed to maintaining compliance with all applicable environmental regulations as part of its ongoing operations. If you have any questions, please call me at (309) 266-3639 (direct) or Bradford Boyes at Cardno ENTRIX at (805) 979-9447 (direct).

Sincerely,



Columbia J. Ozuna
Regulatory Compliance Team
Caterpillar Logistics Inc.

Attachments:

- A, B, C, D1, D2, D3, D4, D5 called-out above
- 1 ATC/PTO Permit Application Form
- 1 CEQA Information Form
- 2 Emergency/Low-Use ICE for Non-Ag Operations Forms
- Assignment of Agent
- Fee Check for \$1025.00 payable to SJVAPCD

Cc: Bradford Boyes, Cardno ENTRIX

Appendix D
HRA Summary and AAQA

San Joaquin Valley Air Pollution Control District Risk Management Review

To: William Jones, Permit Services
 From: Trevor Joy, AQS – Technical Services
 Date: 6/20/12
 Facility Name: Caterpillar Logistics
 Location: 500 N. Morton Ave in Kern County
 Application #(s): S-8157-1-0 and -2-0
 Project #: 1121267

A. RMR SUMMARY

RMR Summary			
Categories	Emergency Engines (Units 1-0 and 2-0)	Project Totals	Facility Totals
Prioritization Score	N/A ¹	N/A ¹	>1
Acute Hazard Index	N/A ²	N/A ²	0.00
Chronic Hazard Index	N/A ²	N/A ²	0.00
Maximum Individual Cancer Risk	0.1 ³	0.1 ³	0.1
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.
- 3 Maximum Cancer Risk is a worker adjusted value.

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

4. The PM10 emissions rate shall not exceed 0.05 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]
5. {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
6. 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

Unit 2-0

4. The PM10 emissions rate shall not exceed **0.22** 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]
5. {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
6. 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 **26** 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 June 5, 2012 to perform a Risk Management Review and an Ambient Air Quality Analysis for the proposed installation of a 1207 BHP Diesel Fired IC Engine powering a generator (Unit 1-0), and a 157 BHP Diesel Fired IC Engine powering a Fire Water Pump (Unit 2-0), both units are for intermittent use.

II. Analysis

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	Rural
BHP	1207	PM₁₀ g/hp-hr	0.05
Closest Receptor (m)	274	Quad	2
Max Hours per Year	50	Type of Receptor	Business
Stack Height (m)	2.7	Stack Inside Diameter (m)	0.203
Gas Exit Velocity (m/s)	70.7	Gas Exit Temp (K)	738

Analysis Parameters Unit 2-0			
Source Type	Point	Location Type	Rural
BHP	157	PM ₁₀ g/hp-hr	0.22
Closest Receptor (m)	274	Quad	2
Max Hours per Year	26	Type of Receptor	Business
Stack Height (m)	1.5	Stack Inside Diameter (m)	0.102
Gas Exit Velocity (m/s)	156	Gas Exit Temp (K)	838

Technical Services also performed modeling for criteria pollutants CO, NO_x, SO_x and PM₁₀; as well as a RMR. The emission rates used for criteria pollutant modeling were

Unit 1-0-----

	NOx	Sox	CO	PM10
Lbs/hr	NA*	NA*	NA*	NA*
Lbs/yr	399	1	80	20

*Intermittent use source 1 hour does not require AAQA modeling.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results**

Values are in µg/m³

Steam Generator	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	X ¹	X	X ¹	X	X
NO _x	X ¹	X	X ¹	X	Pass
SO _x	X ¹	X ¹	X ¹	X ¹	Pass
PM ₁₀	X	X	X	X ¹	Pass
PM _{2.5}	X	X	X	X ¹	Pass

**Results were taken from the attached PSD spreadsheet.

¹Intermittent use source does not require AAQA modeling

²The maximum predicted concentration for emissions of these criteria pollutants from the proposed unit are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

Unit 2-0-----

	NOx	Sox	CO	PM10
Lbs/hr	NA*	NA*	NA*	NA*
Lbs/yr	97	0	128	8

*Intermittent use source 1 hour does not require AAQA modeling.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results**

Values are in $\mu\text{g}/\text{m}^3$

Steam Generator	1 Hour	3 Hours	8 Hours.	24 Hours	Annual
CO	X ¹	X	X ¹	X	X
NO _x	X ¹	X	X ¹	X	Pass
SO _x	X ¹	X ¹	X ¹	X ¹	Pass
PM ₁₀	X	X	X	X ¹	Pass ²
PM _{2.5}	X	X	X	X ¹	Pass ²

**Results were taken from the attached PSD spreadsheet.

¹Intermittent use source does not require AAQA modeling

²The maximum predicted concentration for emissions of these criteria pollutants from the proposed unit are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).

III. Conclusion

The acute and chronic hazard indices were below 1.0; and the cancer risk is less than or equal to 1.0 in a million. **In accordance with the District's Risk Management Policy, both engines are approved without Toxic Best Available Control Technology (T-BACT).**

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.

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.

Attachments:

- A. RMR request from the project engineer
- B. DICE
- C. HEARTS – Facility Summary
- D. AAQA spreadsheet

Appendix E

QNEC Calculations

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr
- PE2 = Post-Project Potential to Emit for each emissions unit, lb/qtr
- PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr

Since this is a new unit, PE1 = 0 for all pollutants. Thus, QNEC = PE2 (lb/qtr).

Using the PE2 (lb/yr) values calculated in Section VII.C.2, Quarterly PE2 is calculated as follows:

$$PE2_{\text{quarterly}} = PE2 \text{ (lb/yr)} \div 4 \text{ quarters/year} = QNEC$$

S-8157-1-0

QNEC		
Pollutant	PE2 Total (lb/yr)	Quarterly PE2 (lb/qtr)
NO _x	399	99.8
SO _x	1	0.3
PM ₁₀	20	5.0
CO	80	20.0
VOC	17	4.3

S-8157-2-0

QNEC		
Pollutant	PE2 Total (lb/yr)	Quarterly PE2 (lb/qtr)
NO _x	25	6.3
SO _x	0	0.0
PM ₁₀	2	0.5
CO	33	8.3
VOC	2	0.5