



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

**SEP 10 2012**

Fred Cordano  
California Department of Corrections and Rehabilitation  
PO Box 213004  
Stockton, CA 95213

**Re: Notice of Preliminary Decision - Authority to Construct**  
**Project Number: N-1121733**

Dear Mr. Cordano:

Enclosed for your review and comment is the District's analysis of California Department of Corrections and Rehabilitation's application for an Authority to Construct for six diesel fired emergency engines , at 7707 S. Austin Road in Stockton, 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. Mark Schonhoff of Permit Services at (209) 557-6448.

Sincerely,

David Warner  
Director of Permit Services

DW:MJS/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

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1990 E. Gettysburg Avenue  
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34946 Flyover Court  
Bakersfield, CA 93308-9725  
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# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



## HEALTHY AIR LIVING™

SEP 10 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: N-1121733**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of California Department of Corrections and Rehabilitation's application for an Authority to Construct for six diesel fired emergency engines , at 7707 S. Austin Road in Stockton, CA.

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Stockton Record  
Stockton Record

**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 Authorities to Construct to the California Department of Corrections and Rehabilitation for six diesel fired emergency engines , at 7707 S. Austin Road in Stockton, CA.

The analysis of the regulatory basis for this proposed action, Project #N-1121733, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](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, 4800 ENTERPRISE WAY, MODESTO, CA.**

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

Facility Name: California Dept. of Corrections  
Mailing Address: PO Box 213004

Date: September 6, 2012  
Engineer/ Mark Schonhoff  
Specialist:

Contact Person: Fred Cordano (California Dept. of Corrections)  
Michelle Heick (Hansel Phelps Construction)  
Telephone: (916) 255-2583 (Fred Cordano)  
(209) 507-7800 (Michelle Heick)  
Application #: N-8750-13-0, -14-0, -15-0, -16-0, -17-0 and -18-0  
Project #: N-1121733  
Complete: June 28, 2012

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## **I. Proposal**

The California Department of Corrections is proposing to install six 2,937 bhp diesel-fired emergency standby internal combustion (IC) engines powering electrical generators.

## **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 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**

7707 S. Austin Road  
Stockton, CA

The facility property line is within 1,000 feet of Johanna Boss High School. However, the proposed engine site is more than 1,000 feet from the school site (roughly 1,455 feet). Since it would be possible for a plan change to result in the engines being located within 1,000 feet of the school, the following condition will be placed on the Authority-to-Construct permit for each unit.

*The engine exhaust stacks shall not be within 1,000 feet of a K-12 school.*

### **IV. Process Description**

The emergency standby engines will power electrical generators. Other than emergency standby operation, each engine may be operated up to 50 hours per year for maintenance and testing purposes.

### **V. Equipment Listing**

Except for the internal designation of the engines, which will be included on the ATC and PTO equipment descriptions, the equipment description will be the same for each unit. Those designations are 531-GEN-1 through 531-GEN-6. The description shown below is for unit N-8750-13-0.

2,937 BHP CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED  
EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR  
(ID #531-GEN-1)

## **VI. Emission Control Technology Evaluation**

The applicant has proposed to install six Tier 2 certified diesel-fired IC engine that will be fired on very low-sulfur diesel fuel (0.0015% by weight sulfur maximum).

### **NO<sub>x</sub>, CO, VOC and PM<sub>10</sub>:**

The proposed engine does not meet the latest published Tier Certification requirements; However, compliance with both BACT and CARB's stationary ATCM requirements will be met as described below (see Appendix C for a copy of the emissions data sheet and/or the ARB/EPA executive order).

Although Tier 4i requirements for this category of engine went into effect in 2011, CARB regulations and District policy allows for the availability of Tier 4i units to be accounted for. CARB's Stationary ATCM exemption §93115.3(u) says, "If the Executive Officer or District finds, based on verifiable information from the engine manufacturer, distributor, or dealer, that current model year engines meeting the current emission standards are not available or not available in sufficient numbers or in a sufficient range of makes, models, and horsepower ratings, then the Executive Officer or the District may allow the sale, purchase, or installation of a new stock engine meeting the emission standards from the previous model year to meet the new stationary diesel-fueled engine emission standards pursuant to title 13 of the California Code of Regulations or 40 CFR part 89." The District has thoroughly investigated, with each of the common manufacturers', the availability of Tier 4i units in this size range, and has found them to be currently unavailable. Since Tier 4i units are not available, as described above, the installation of a Tier 2 unit is acceptable, as Tier 2 is the prior published Tier in this engine's size range.

### **SO<sub>x</sub>:**

The use of very low-sulfur diesel fuel (0.0015% by weight sulfur maximum) reduces SO<sub>x</sub> emissions by over 99% from standard diesel fuel.

## VII. General Calculations

### A. Assumptions

|  |                        |
|--|------------------------|
| 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 $\approx$ 35% |
| PM <sub>10</sub> fraction of diesel exhaust: | 0.96 (CARB, 1988)      |

The engine has certified NO<sub>x</sub> + VOC emissions of 4.33 g/bhp-hr. It will be assumed the NO<sub>x</sub> + VOC emission factor is split 95% NO<sub>x</sub> and 5% VOC (per the District's Carl Moyer program).

### B. Emission Factors

The emission factors are the same for each unit.

The NO<sub>x</sub> + VOC emission factor is 4.33 g/bhp-hr. Per District guidance document GEAR-11d, 95% of this would be expected to be NO<sub>x</sub> and 5% would be expected to be VOC.

$$EF_{NO_x} = (4.33 \text{ g/bhp-hr})(0.95) = 4.11 \text{ g/bhp-hr}$$

$$EF_{VOC} = (4.33 \text{ g/bhp-hr})(0.05) = 0.22 \text{ g/bhp-hr}$$

$$EF_{CO} = 0.746 \text{ g/bhp-hr}$$

$$EF_{SO_x} = 0.0045 \text{ g/bhp-hr} \text{ – see below}$$

|                           |            |
|---------------------------|------------|
| Sulfur Content of Diesel: | 15 ppmw    |
| Density of Diesel:        | 7.1 lb/gal |
| Fuel Use:                 | 138 gal/hr |
| Engine Rating:            | 2,681 bhp  |

$$EF_{SO_x} = [(15 \text{ lb S}/10^6 \text{ lb fuel})(7.1 \text{ lb fuel/gal})(138 \text{ gal/hr})(2 \text{ lb SO}_2/\text{lb S}) \\ \times (453.5 \text{ g/lb})] / (2,937 \text{ bhp}) = 0.005 \text{ g/bhp-hr}$$

$$EF_{PM_{10}} = 0.13 \text{ g/bhp-hr (applicant)}$$

**C. Calculations**

**1. Pre-Project Emissions (PE1)**

The units are new, therefore, PE1 = 0.

**2. Post-Project PE (PE2)**

The daily and annual PE are calculated as follows:

| 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 <sub>x</sub>  | 4.11                        | 2,937        | 24                                 | 50                                 | 638.7              | 1,331              |
| SO <sub>x</sub>  | 0.0050                      | 2,937        | 24                                 | 50                                 | 0.8                | 2                  |
| PM <sub>10</sub> | 0.13                        | 2,937        | 24                                 | 50                                 | 20.2               | 42                 |
| CO               | 0.746                       | 2,937        | 24                                 | 50                                 | 115.9              | 242                |
| VOC              | 0.05                        | 2,937        | 24                                 | 50                                 | 7.8                | 16                 |

**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.

The following are from the Application Review document for project N-1121071.

| Permit #   | SSPE1 (lb/yr) |        |       |     |       |
|------------|---------------|--------|-------|-----|-------|
|            | NOx           | CO     | VOC   | SOx | PM10  |
| N-8750-1-0 | 525           | 1,776  | 265   | 137 | 366   |
| N-8750-2-0 | 525           | 1,776  | 265   | 137 | 366   |
| N-8750-3-0 | 525           | 1,776  | 265   | 137 | 366   |
| N-8750-4-0 | 525           | 1,776  | 265   | 137 | 366   |
| N-8750-5-0 | 525           | 1,776  | 265   | 137 | 366   |
| N-8750-6-0 | 525           | 1,776  | 265   | 137 | 366   |
| ERC        | 0             | 0      | 0     | 0   | 0     |
| Total      | 3,150         | 10,656 | 1,590 | 822 | 2,196 |



**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.

| SSPE2 (lb/yr) |        |        |       |     |       |
|---------------|--------|--------|-------|-----|-------|
| Permit #      | NOx    | CO     | VOC   | SOx | PM10  |
| N-8750-1-0    | 525    | 1,776  | 265   | 137 | 366   |
| N-8750-2-0    | 525    | 1,776  | 265   | 137 | 366   |
| N-8750-3-0    | 525    | 1,776  | 265   | 137 | 366   |
| N-8750-4-0    | 525    | 1,776  | 265   | 137 | 366   |
| N-8750-5-0    | 525    | 1,776  | 265   | 137 | 366   |
| N-8750-6-0    | 525    | 1,776  | 265   | 137 | 366   |
| N-8750-13-0   | 1,331  | 242    | 16    | 2   | 42    |
| N-8750-14-0   | 1,331  | 242    | 16    | 2   | 42    |
| N-8750-15-0   | 1,331  | 242    | 16    | 2   | 42    |
| N-8750-16-0   | 1,331  | 242    | 16    | 2   | 42    |
| N-8750-17-0   | 1,331  | 242    | 16    | 2   | 42    |
| N-8750-18-0   | 1,331  | 242    | 16    | 2   | 42    |
| ERC           | 0      | 0      | 0     | 0   | 0     |
| Total         | 11,136 | 12,108 | 1,686 | 834 | 2,448 |

## 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 <sub>x</sub>            | 3,150         | 11,136        | 20,000                         | No                     | No                       |
| SO <sub>x</sub>            | 822           | 834           | 140,000                        | No                     | No                       |
| PM <sub>10</sub>           | 2,196         | 2,448         | 140,000                        | No                     | No                       |
| CO                         | 10,656        | 12,108        | 200,000                        | No                     | No                       |
| VOC                        | 1,590         | 1,686         | 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)

The units are new, therefore, their Baseline Emissions are zero.

## 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 PM<sub>10</sub> (140,000 lb/year), it is not a major source for PM<sub>2.5</sub> (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.

As discussed in Section I, the facility is proposing to install six new emergency standby IC engines. 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.

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

| New Emissions Unit BACT Applicability |  |                                    |               |                 |
|---------------------------------------|--|------------------------------------|---------------|-----------------|
| Pollutant                             | Daily Emissions for each unit (lb/day) | BACT Threshold (lb/day)            | SSPE2 (lb/yr) | BACT Triggered? |
| NO <sub>x</sub>                       | 638.7                                  | > 2.0                              | n/a           | Yes             |
| SO <sub>x</sub>                       | 0.8                                    | > 2.0                              | n/a           | No              |
| PM <sub>10</sub>                      | 20.2                                   | > 2.0                              | n/a           | Yes             |
| CO                                    | 115.9                                  | > 2.0 and<br>SSPE2 ≥ 200,000 lb/yr | 12,108        | No              |
| VOC                                   | 7.8                                    | > 2.0                              | n/a           | Yes             |

As shown above, BACT will be required for NO<sub>x</sub>, PM<sub>10</sub>, and VOC emissions from the each engine in this project.

## 2. BACT Guideline

BACT Guideline 3.1.1, which appears in Appendix B 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."

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

- NO<sub>x</sub>: Latest EPA Tier Certification level for applicable horsepower range
- VOC: Latest EPA Tier Certification level for applicable horsepower range
- PM<sub>10</sub>: 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 SO<sub>x</sub> and PM<sub>10</sub> BACT emissions limit(s):

- Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 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

As shown in Section VII.C.2, daily emissions for NO<sub>x</sub> and CO are greater than 100 lb/day.

- 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 engines are the only emissions sources that will generate an increase in Potential to Emit. Since the proposed engine emissions are 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 shown 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 each ATC to ensure compliance:

- Emissions from this IC engine shall not exceed any of the following limits: 4.11 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.05 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]
- 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 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 NO<sub>x</sub>, CO, PM<sub>10</sub>, PM<sub>2.5</sub> or SO<sub>x</sub>.

### **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 proposed engines are subject to the requirements of this subpart. The District has not yet obtained a delegation from EPA to enforce this subpart. Therefore, requirements of this subpart are not listed in the permit at this time.

### **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)**

The proposed engines are subject to the requirements of this subpart. The District has not yet obtained a delegation from EPA to enforce this subpart. Therefore, requirements of this subpart are not listed in the permit at this time.

### **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.

| <b>RMR Results</b> |                    |                      |                   |                  |
|--------------------|--------------------|----------------------|-------------------|------------------|
| Unit               | Acute Hazard Index | Chronic Hazard Index | Cancer Risk       | T-BACT Required? |
| N-8750-13-0        | N/A                | N/A                  | 0.42 in a million | No               |
| N-8750-14-0        | N/A                | N/A                  | 0.42 in a million | No               |
| N-8750-15-0        | N/A                | N/A                  | 0.42 in a million | No               |
| N-8750-16-0        | N/A                | N/A                  | 0.42 in a million | No               |
| N-8750-17-0        | N/A                | N/A                  | 0.42 in a million | No               |
| N-8750-18-0        | N/A                | N/A                  | 0.42 in a million | No               |

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

- {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]
- Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]
- 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]

**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 PM<sub>10</sub> emission factor of 0.4 g-PM<sub>10</sub>/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 PM<sub>10</sub> 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<br>Emergency Standby IC Engines   | Proposed Method of Compliance with<br>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                                      | The following conditions will be included on the permit: <ul style="list-style-type: none"> <li>• {3807} An emergency situation is an unscheduled electrical power outage caused by</li> </ul> |

|   |   |
|---|---|
| <p>power for the electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract.</p>   | <p>sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]</p> <ul style="list-style-type: none"> <li>• {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]</li> </ul>  |
| <p>The owner/operator must operate and maintain the engine(s) and any installed control devices according to the manufacturers written instructions.</p>  | <p>A permit condition enforcing this requirement was shown earlier in the evaluation.</p>   |
| <p>The owner/operator must monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.</p>  | <p>The following condition will be included on the permit:</p> <ul style="list-style-type: none"> <li>• {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]</li> </ul>  |
| <p>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 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>The following conditions will be included on the permit:</p> <ul style="list-style-type: none"> <li>• {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 Rules 4701, 4702 and 17 CCR 93115]</li> <li>• The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]</li> </ul> |

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>{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 Rules 4701, 4702 and 17 CCR 93115]</li> </ul> |
|--|---|

**Rule 4801 Sulfur Compounds**

Rule 4801 requires that sulfur compound emissions (as SO<sub>2</sub>) 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 SO<sub>2</sub>

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

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

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

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 and 17 CCR 93115]

**California Health & Safety Code 42301.6 (School Notice)**

The District has verified that the engines will not be 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.

| <p><b>Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators</b></p>   | <p><b>Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements</b></p>  |
|---|---|
| <p>Emergency engine(s) must be fired on CARB diesel fuel, or an approved alternative diesel fuel.</p>   | <p>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.</p>   |
| <p>The engine(s) must emit diesel PM at a rate less than or equal to 0.15 g/bhp-</p>  | <p>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 this regulation. Additionally, the proposed diesel PM emissions rate is less than 0.15 g/bhp-hr.</p>   |
| <p>The engine may not be operated more than 50 hours per year for maintenance and testing purposes.</p>   | <p>The following condition will be included on the permit:</p> <ul style="list-style-type: none"> <li>• 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]</li> </ul> |
| <p>Engines, with a PM10 emissions rate 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>The District has verified that this engine is not located 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 Authorities to Construct N-8750-13-0, N-8750-14-0, N-8750-15-0, N-8750-16-0, N-8750-17-0 and N-8750-18-0 subject to the conditions on the attached draft Authority to Construct in Appendix A.

**X. Billing Information**

| <b>Billing Schedule</b> |                     |                        |                   |
|-------------------------|---------------------|------------------------|-------------------|
| <b>Permit Number</b>    | <b>Fee Schedule</b> | <b>Fee Description</b> | <b>Fee Amount</b> |
| N-8750-13-0             | 3020-10-F           | 2937 bhp IC engine     | \$749.00          |
| N-8750-14-0             | 3020-10-F           | 2937 bhp IC engine     | \$749.00          |
| N-8750-15-0             | 3020-10-F           | 2937 bhp IC engine     | \$749.00          |
| N-8750-16-0             | 3020-10-F           | 2937 bhp IC engine     | \$749.00          |
| N-8750-17-0             | 3020-10-F           | 2937 bhp IC engine     | \$749.00          |
| N-8750-18-0             | 3020-10-F           | 2937 bhp IC engine     | \$749.00          |

**Appendices**

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

## Appendix A Draft ATCs

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-8750-13-0

**LEGAL OWNER OR OPERATOR:** CALIFORNIA DEPT OF CORRECTIONS & REHAB  
**MAILING ADDRESS:** PO BOX 213004  
STOCKTON, CA 95213-9004

**LOCATION:** 7707 S AUSTIN RD  
STOCKTON, CA

**EQUIPMENT DESCRIPTION:**  
2,937 BHP CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR (ID #531-GEN-1)

**CONDITIONS**

1. The engine exhaust stack shall not be within 1,000 feet of a K-12 school. [District Rule 4102]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {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]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93115]
7. 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]
8. Emissions from this IC engine shall not exceed any of the following limits: 4.11 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.05 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
9. Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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

N-8750-13-0 - Aug 22 2012 @ 15:41 - SCD/KH/KOM - Joint Inspection NOT Required



10. 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]
11. {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]
12. {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]
13. 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]
14. {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]
15. 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 Rules 4701, 4702 and 17 CCR 93115]
16. U.S. EPA administers the requirements of 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ. The owner or operator shall comply with the emission and operating limitations, testing requirements, initial and continuous compliance requirements as specified in these subparts. The owner or operator shall submit all applicable notifications, reports, and records to the administrator by the required compliance dates. [District Rules 4001 and 4002]

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT

PERMIT NO: N-8750-14-0

LEGAL OWNER OR OPERATOR: CALIFORNIA DEPT OF CORRECTIONS & REHAB  
MAILING ADDRESS: PO BOX 213004  
STOCKTON, CA 95213-9004

LOCATION: 7707 S AUSTIN RD  
STOCKTON, CA

**EQUIPMENT DESCRIPTION:**

2,937 BHP CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR (ID #531-GEN-2)

**CONDITIONS**

1. The engine exhaust stack shall not be within 1,000 feet of a K-12 school. [District Rule 4102]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {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]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93115]
7. 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]
8. Emissions from this IC engine shall not exceed any of the following limits: 4.11 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.05 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
9. Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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.

Sayed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

N-8750-14-0: Aug 22 2012 9:15AM - BCHOHOM : Joint Inspection NOT Required

10. 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]
11. {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]
12. {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]
13. 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]
14. {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]
15. 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 Rules 4701, 4702 and 17 CCR 93115]
16. U.S. EPA administers the requirements of 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ. The owner or operator shall comply with the emission and operating limitations, testing requirements, initial and continuous compliance requirements as specified in these subparts. The owner or operator shall submit all applicable notifications, reports, and records to the administrator by the required compliance dates. [District Rules 4001 and 4002]

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT

PERMIT NO: N-8750-15-0

LEGAL OWNER OR OPERATOR: CALIFORNIA DEPT OF CORRECTIONS & REHAB  
MAILING ADDRESS: PO BOX 213004  
STOCKTON, CA 95213-9004

LOCATION: 7707 S AUSTIN RD  
STOCKTON, CA

EQUIPMENT DESCRIPTION:  
2,937 BHP CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR (ID #531-GEN-3)

**CONDITIONS**

1. The engine exhaust stack shall not be within 1,000 feet of a K-12 school. [District Rule 4102]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {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]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93115]
7. 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]
8. Emissions from this IC engine shall not exceed any of the following limits: 4.11 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.05 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
9. Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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Sayed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services

N-8750-15-0 : Aug 22 2012 8:15AM - BCHOH:GM : Joint Inspection NOT Required

10. 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]
11. {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]
12. {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]
13. 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]
14. {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]
15. 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 Rules 4701, 4702 and 17 CCR 93115]
16. U.S. EPA administers the requirements of 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ. The owner or operator shall comply with the emission and operating limitations, testing requirements, initial and continuous compliance requirements as specified in these subparts. The owner or operator shall submit all applicable notifications, reports, and records to the administrator by the required compliance dates. [District Rules 4001 and 4002]

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT

PERMIT NO: N-8750-16-0

LEGAL OWNER OR OPERATOR: CALIFORNIA DEPT OF CORRECTIONS & REHAB  
MAILING ADDRESS: PO BOX 213004  
STOCKTON, CA 95213-9004

LOCATION: 7707 S AUSTIN RD  
STOCKTON, CA

**EQUIPMENT DESCRIPTION:**

2,937 BHP CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR (ID #531-GEN-4)

**CONDITIONS**

1. The engine exhaust stack shall not be within 1,000 feet of a K-12 school. [District Rule 4102]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {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]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93115]
7. 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]
8. Emissions from this IC engine shall not exceed any of the following limits: 4.11 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.05 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
9. Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

N-8750-16-0: Aug 22 2012 9:15AM - GCHONHOM - Joint Inspection NOT Required

10. 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]
11. {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]
12. {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]
13. 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]
14. {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]
15. 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 Rules 4701, 4702 and 17 CCR 93115]
16. U.S. EPA administers the requirements of 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ. The owner or operator shall comply with the emission and operating limitations, testing requirements, initial and continuous compliance requirements as specified in these subparts. The owner or operator shall submit all applicable notifications, reports, and records to the administrator by the required compliance dates. [District Rules 4001 and 4002]

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-8750-17-0

**LEGAL OWNER OR OPERATOR:** CALIFORNIA DEPT OF CORRECTIONS & REHAB  
**MAILING ADDRESS:** PO BOX 213004  
STOCKTON, CA 95213-9004

**LOCATION:** 7707 S AUSTIN RD  
STOCKTON, CA

**EQUIPMENT DESCRIPTION:**  
2,937 BHP CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR (ID #531-GEN-5)

**CONDITIONS**

1. The engine exhaust stack shall not be within 1,000 feet of a K-12 school. [District Rule 4102]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {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]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93115]
7. 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]
8. Emissions from this IC engine shall not exceed any of the following limits: 4.11 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.05 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
9. Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

**DAVID WARNER**, Director of Permit Services

N-8750-17-0; Aug 22 2012 6:15AM - GCHDNHOM : Joint Inspection NOT Required



10. 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]
11. {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]
12. {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]
13. 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]
14. {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]
15. 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 Rules 4701, 4702 and 17 CCR 93115]
16. U.S. EPA administers the requirements of 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ. The owner or operator shall comply with the emission and operating limitations, testing requirements, initial and continuous compliance requirements as specified in these subparts. The owner or operator shall submit all applicable notifications, reports, and records to the administrator by the required compliance dates. [District Rules 4001 and 4002]

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT

**DRAFT**

**PERMIT NO:** N-8750-18-0

**LEGAL OWNER OR OPERATOR:** CALIFORNIA DEPT OF CORRECTIONS & REHAB  
**MAILING ADDRESS:** PO BOX 213004  
STOCKTON, CA 95213-9004

**LOCATION:** 7707 S AUSTIN RD  
STOCKTON, CA

**EQUIPMENT DESCRIPTION:**  
2,937 BHP CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR (ID #531-GEN-6)

**CONDITIONS**

1. The engine exhaust stack shall not be within 1,000 feet of a K-12 school. [District Rule 4102]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {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]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702 and 17 CCR 93115]
7. 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]
8. Emissions from this IC engine shall not exceed any of the following limits: 4.11 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.05 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
9. Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

**DRAFT**

DAVID WARNER, Director of Permit Services

N-8750-18-0 Aug 22 2012 9:15AM - 8CHONHOM : Jethi Inspection NOT Required

10. 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]
11. {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]
12. {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]
13. 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]
14. {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]
15. 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 Rules 4701, 4702 and 17 CCR 93115]
16. U.S. EPA administers the requirements of 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ. The owner or operator shall comply with the emission and operating limitations, testing requirements, initial and continuous compliance requirements as specified in these subparts. The owner or operator shall submit all applicable notifications, reports, and records to the administrator by the required compliance dates. [District Rules 4001 and 4002]

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**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.

## 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<sub>x</sub> 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.

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

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 highest 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 engines are rated at 2,937 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 NO<sub>x</sub> 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.



### **3. BACT Analysis for PM<sub>10</sub> 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 NO<sub>x</sub> 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/PM<sub>10</sub> 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 PM<sub>10</sub> 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.

Appendix C  
Emissions Data Sheet

|  |                         |   |
|--|-------------------------|---|
|  <b>AIR RESOURCES BOARD</b> | <b>CATERPILLAR INC.</b> | <b>EXECUTIVE ORDER U-R-001-0389</b><br>New Off-Road<br>Compression-Ignition Engines |
|--|-------------------------|---|

Pursuant to the authority vested in the Air Resources Board by Sections 43013, 43018, 43101, 43102, 43104 and 43105 of the Health and Safety Code; and

Pursuant to the authority vested in the undersigned by Sections 39515 and 39516 of the Health and Safety Code and Executive Order G-02-003;

**IT IS ORDERED AND RESOLVED:** That the following compression-ignition engines and emission control systems produced by the manufacturer are certified as described below for use in off-road equipment. Production engines shall be in all material respects the same as those for which certification is granted.

| MODEL YEAR  | ENGINE FAMILY | DISPLACEMENT (liters) | FUEL TYPE                     | USEFUL LIFE (hours) |
|---|---------------|-----------------------|-------------------------------|---------------------|
| 2010  | ACPXL78.1T2Y  | 69.0                  | Diesel                        | 8000                |
| SPECIAL FEATURES & EMISSION CONTROL SYSTEMS   |               |                       | TYPICAL EQUIPMENT APPLICATION |                     |
| Direct Diesel Injection, Turbocharger, Charge Air Cooler, Smoke Puff Limiter, Engine Control Module |               |                       | Generator                     |                     |

The engine models and codes are attached.

The following are the exhaust certification standards (STD), or family emission limit(s) (FEL) as applicable, and certification levels (CERT) for hydrocarbon (HC), oxides of nitrogen (NOx), or non-methane hydrocarbon plus oxides of nitrogen (NMHC+NOx), carbon monoxide (CO), and particulate matter (PM) in grams per kilowatt-hour (g/kw-hr), and the opacity-of-smoke certification standards and certification levels in percent (%) during acceleration (Accel), lugging (Lug), and the peak value from either mode (Peak) for this engine family (Title 13, California Code of Regulations, (13 CCR) Section 2423):

| RATED POWER CLASS | EMISSION STANDARD CATEGORY |      | EXHAUST (g/kw-hr) |     |          |     |      | OPACITY (%) |     |      |
|-------------------|----------------------------|------|-------------------|-----|----------|-----|------|-------------|-----|------|
|                   |                            |      | HC                | NOx | NMHC+NOx | CO  | PM   | ACCEL       | LUG | PEAK |
| kW > 560          | Tier 2                     | STD  | N/A               | N/A | 6.4      | 3.5 | 0.20 | N/A         | N/A | N/A  |
|                   |                            | FEL  | N/A               | N/A | 5.9      | N/A | 0.18 | N/A         | N/A | N/A  |
|                   |                            | CERT | -                 | -   | 5.8      | 1.0 | 0.17 | -           | -   | -    |

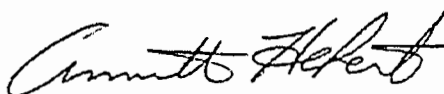
**BE IT FURTHER RESOLVED:** That the family emission limit(s) (FEL) is an emission level declared by the manufacturer for use in any averaging, banking and trading program and in lieu of an emission standard for certification. It serves as the applicable emission standard for determining compliance of any engine within this engine family under 13 CCR Sections 2423 and 2427.

**BE IT FURTHER RESOLVED:** That for the listed engine models, the manufacturer has submitted the information and materials to demonstrate certification compliance with 13 CCR Section 2424 (emission control labels), and 13 CCR Sections 2425 and 2426 (emission control system warranty).

Engines certified under this Executive Order must conform to all applicable California emission regulations.

**This Executive Order is only granted to the engine family and model-year listed above. Engines in this family that are produced for any other model-year are not covered by this Executive Order.**

Executed at El Monte, California on this 29 day of October 2009.



Annette Hebert, Chief  
 Mobile Source Operations Division

Appendix D  
HRA Summary and AAQA

## San Joaquin Valley Air Pollution Control District Risk Management Review

To: Mark Schonhoff, AQE - Permit Services  
 From: Yu P Vu, AQS - Permit Services  
 Date: July 5, 2012  
 Facility Name: California Dept Of Corrections & Rehab  
 Location: 7707 S Austin Rd, Stockton, CA  
 Application #(s): N-8750-13-0 through 18-0  
 Project #: N-1121733

---

### A. RMR SUMMARY

| RMR Summary  |  |                   |                    |
|--|--|-------------------|--------------------|
| Categories   | Diesel-Fired IC Engine<br>(Unit 13-0 through 18-0) | Project<br>Totals | Facility<br>Totals |
| Prioritization Score                               | N/A <sup>1</sup>                                   | N/A <sup>1</sup>  | >1.0               |
| Acute Hazard Index                                 | N/A <sup>2</sup>                                   | N/A <sup>2</sup>  | N/A <sup>2</sup>   |
| Chronic Hazard Index                               | N/A <sup>2</sup>                                   | N/A <sup>2</sup>  | N/A <sup>2</sup>   |
| Maximum Individual Cancer Risk (10 <sup>-6</sup> ) | 0.42 (each) <sup>3</sup>                           | 2.52              | 2.52               |
| 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 Represents risk at 150 meters from nearest receptor.

### Proposed Permit Conditions

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

#### Unit #s 13-0 through 18-0

1. The PM10 emissions rate shall not exceed 0.13 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 July 5, 2012, to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for a proposed installation of six (6) 2,937 hp diesel-fired emergency IC engines powering electrical generators.

### 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<br>Unit 13-0 through 18-0 (each) |       |                          |        |
|--|-------|--------------------------|--------|
| Source Type  | Point | Location Type            | Rural  |
| BHP  | 2,937 | PM <sub>10</sub> g/hp-hr | 0.13   |
| Closest Receptor (m) <sup>1</sup>                    | 33.53 | Quad                     | Quad 2 |
| Max Hours per Year                                   | 50    | Type of Receptor         | Worker |

<sup>1</sup> Although the units in this project were evaluated at this receptor distance, the maximum risk actually occurred at 150 meters.

Technical Services also performed modeling for criteria pollutants CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The emission rates used for criteria pollutant modeling were 242 lb/yr CO, 1,402 lb/yr NO<sub>x</sub>, 2 lb/yr SO<sub>x</sub>, 42 lb/yr PM<sub>10</sub>, and 42 lb/yr PM<sub>2.5</sub>.

The results from the Criteria Pollutant Modeling are as follows:

#### Criteria Pollutant Modeling Results\*

| Diesel ICE        | 1 Hour          | 3 Hours         | 8 Hours         | 24 Hours        | Annual            |
|-------------------|-----------------|-----------------|-----------------|-----------------|-------------------|
| CO                | NA <sup>1</sup> | X               | NA <sup>1</sup> | X               | X                 |
| NO <sub>x</sub>   | NA <sup>1</sup> | X               | X               | X               | Pass              |
| SO <sub>x</sub>   | NA <sup>1</sup> | NA <sup>1</sup> | X               | NA <sup>1</sup> | Pass              |
| PM <sub>10</sub>  | X               | X               | X               | NA <sup>1</sup> | Pass <sup>2</sup> |
| PM <sub>2.5</sub> | X               | X               | X               | NA <sup>1</sup> | Pass <sup>2</sup> |

\*Results were taken from the attached PSD spreadsheet.

<sup>1</sup>The project is an intermittent source as defined in APR-1920. In accordance with APR-1920, compliance with short-term (i.e., 1-hour, 3-hour, 8-hour and 24-hour) standards is not required.

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

### **III. Conclusion**

The cancer risks associated with the operation of the proposed diesel IC engines are 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 each unit in this project.

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.

# 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:

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

| QNEC             |                   |                        |
|------------------|-------------------|------------------------|
| Pollutant        | PE2 Total (lb/yr) | Quarterly PE2 (lb/qtr) |
| NO <sub>x</sub>  | 1,331             | 332.75                 |
| SO <sub>x</sub>  | 242               | 60.5                   |
| PM <sub>10</sub> | 16                | 4                      |
| CO               | 2                 | 0.5                    |
| VOC              | 42                | 10.5                   |