



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



JUN 03 2013

Mindy Lusk
Pacific Bell Telephone Co. (dba AT&T CA)
P.O. Box 5095
San Ramon, CA 94583-0995

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: N-2412
Project Number: N-1130544

Dear Ms. Lusk:

Enclosed for your review and comment is the District's analysis of Pacific Bell Telephone Co. (dba AT&T CA)'s application for an Authority to Construct for a 2,722 bhp Caterpillar Model 3516C Tier 2 certified diesel-fired emergency standby IC engine powering an electric generator, at 345 N. San Joaquin Street in Stockton, CA.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice period, the District intends to issue the Authority to Construct. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Kai Chan of Permit Services at (209) 557- 6451.

Sincerely,

David Warner
Director of Permit Services

DW:KC/bw

Enclosures

cc: Mike Tollstrup, CARB (w/ enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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Newspaper notice for publication in Stockton Record and for posting on
valleyair.org

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

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Authority to Construct to Pacific Bell Telephone Co. (dba AT&T CA) for a 2,722 bhp Caterpillar Model 3516C Tier 2 certified diesel-fired emergency standby IC engine powering an electric generator, at 345 N. San Joaquin Street in Stockton, CA.

The analysis of the regulatory basis for this proposed action, Project #N-1130544, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by July 8, 2013 to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

**Authority to Construct
Application Review**
Diesel Fired Emergency Standby I.C. Engine

Date: May 29, 2013

Facility Name: Pacific Bell Telephone Co. (DBA AT&T CA)
Mailing Address: P.O. Box 5095
San Ramon, CA 94583-0995

Facility Contact: Mindy M. Lusk
Phone Number: (925) 823-8842

Project Engineer: Kai Chan
Lead Engineer: Rupi Gill
Project Number: N-1130544
Permit Numbers: N-2412-7-0

Deemed Complete: May 14, 2013

I. Proposal

Pacific Bell Telephone Co. is proposing to install a trailer mounted 2,722 bhp Caterpillar Model 3516C Tier 2 certified diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator. This unit will only be operated when either of the existing emergency standby electric generators under permits N-2412-4-0 or N-2412-6-0 is shut down for maintenance or repair. The following permit condition will be placed in the permit to ensure compliance with the applicant's proposal:

- *This unit shall only be used to replace either permit units N-2412-4 or N-2412-6 when it is shut down for maintenance or repair. [District Rule 2201]*

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520 Federally Mandated Operating Permits (06/21/01)
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 Internal Combustion Engines – Phase 1 (08/21/03)
Rule 4702 Internal Combustion Engines – Phase 2 (8/18/11)
Rule 4801 Sulfur Compounds (12/17/92)
California Health & Safety Code 41700 - Health Risk Assessment
California Health & Safety Code 42301.6 - School Notice
Title 17 California Code of Regulations (CCR), Section 93115 - Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387:
CEQA Guidelines

III. Project Location

The equipment will be located at 345 N. San Joaquin Street in Stockton, CA. This facility and associated equipment are located within 1,000 feet of the outer boundary of Stockton Collegiate International Elementary School at 321 E. Weber Avenue, which is a K-5 school. The following schools are also located within ¼ mile of the facility: (a). Aspire Apex Academy at 444 N. American Street; (b). Stockton Collegiate International Secondary School at 1 N. Sutter Street. Therefore, pursuant to CH&SC 42301.6, California Health and Safety Code (School Notice), public notification is required.

IV. Process Description

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

V. Equipment Listing

N-2412-7-0:

Trailer-mounted 2,722 bhp (intermittent) Caterpillar Model 3516C Tier 2 certified diesel-fired emergency standby I.C. engine powering an electrical generator.

VI. Emission Control Technology Evaluation

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

NO_x, CO, VOC, and PM₁₀:

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 D for a copy of the emissions data sheet).

Although interim Tier 4 requirements for this category of engine went into effect in 2011, CARB regulations and District policy allows for the availability of interim Tier 4 units to be accounted for. CARB's Stationary ATCM exemption §93115.3(u) states, "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 engine manufacturers, the availability of interim Tier 4 units in this size range and has found them to be currently unavailable. Since interim Tier 4 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.

SOx:

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

VII. General Calculations

A. Assumptions

Emergency Operating Schedule: 24 hours/day
 Non-Emergency Operating Schedule: 50 hours/year
 Density of diesel fuel: 7.1 lb/gal
 Fuel Consumption Rate: 127.3 gal/hr @ 100% load
 Sulfur Content of Fuel: 0.0015% by weight

B. Emission Factors

Emission factors for the combustion of diesel fuel from the I.C. engine for NO_x, VOC, CO, and PM₁₀ emissions will be based on emission factors from the equipment manufacturer. The SO_x emission factor will be determined using mass balance with a maximum sulfur content of 0.0015% by weight.

$$EF_{SOx} = 0.000015 \text{ lbm S/lbm fuel} \times 7.1 \text{ lbm fuel/gal fuel} \times 453.6 \text{ g/lbm} \\ \times 2 \text{ lbm SO}_2 \text{ exhaust/1 lbm S in fuel} \times 127.3 \text{ gal/hr} \times 1/2,722 \text{ hp} \\ = 0.0045 \text{ g/hp-hr}$$

The engine manufacturer supplied a combined NO_x and VOC emission factor of 4.027 g/bhp-hr. It will be assumed the NO_x + VOC emission factor is split 95% NO_x and 5% VOC per the District's Carl Moyer project. Therefore, the individual NO_x and VOC emission factors for this engine are calculated as follows:

$$EF_{NOx} \text{ (g/bhp-hr)} = NO_x + VOC \text{ (g/bhp-hr)} \times 0.95 = 4.027 \text{ g/bhp-hr} \times 0.95 \\ = \mathbf{3.83 \text{ g/bhp-hr}}$$

$$EF_{VOC} \text{ (g/bhp-hr)} = NO_x + VOC \text{ (g/bhp-hr)} \times 0.05 = 4.027 \text{ g/bhp-hr} \times 0.05 \\ = \mathbf{0.20 \text{ g/bhp-hr}}$$

Pollutant	Emission Factors (EF)
NO _x	3.83 g/hp-hr
CO	1.044 g/hp-hr
VOC	0.20 g/hp-hr
PM ₁₀	0.11 g/hp-hr
SO _x	0.0045 g/hp-hr

C. Potential to Emit Calculations (PE)

1. Pre-Project Potential Emissions (PE1):

Since is a new permit unit, the daily and annual pre-project potential to emit (PE1) for the emission units associated with this permit unit are equal to zero.

2. Post-Project Potential to Emit (PE2):

A. Daily PE2:

The daily potential to emit for the emergency IC engine is based on the maximum proposed operating limit of 24 hours per day. Therefore:

$$\text{Daily PE2}_{N-2412-7-0} = \text{Emission Factor (g/bhp-hr)} \times 2,722 \text{ bhp} \times 24 \text{ hr/day} \times 1 \text{ lbm}/453.6 \text{ g}$$

Pollutant	Emission Factor (g/bhp-hr)	Daily PE2 _{N-2412-7-0} (lb/day)
NOx	3.83	551.6
CO	1.044	150.4
VOC	0.20	28.8
PM ₁₀	0.11	15.8
SOx	0.0045	0.6

B. Annual PE2:

The Annual PE2 for the emergency IC engine is based on the maximum operating limit of the engine for 50 hours per year (maximum non-emergency use for an emergency standby engine powering an electric generator). Therefore:

$$\text{Annual PE2}_{N-2412-7-0} = \text{Emission Factor (g/bhp-hr)} \times 2,722 \text{ bhp} \times 50 \text{ hr/year} \times 1 \text{ lbm}/453.6 \text{ g}$$

Pollutant	Emission Factor (g/bhp-hr)	Annual PE2 _{N-2412-7-0} (lb/year)
NOx	3.83	1,149
CO	1.044	313
VOC	0.20	60
PM ₁₀	0.11	33
SOx	0.0045	1

D. Increase in Permitted Emissions (IPE)

1. Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The following calculation is representative of the QNEC calculations for all criteria pollutants:

$$QNEC_{N-2412-7-0} = \text{Annual PE}_{2N-2412-7-0} \div 4 \text{ Quarters/year}$$

Pollutant	Annual PE _{2N-2412-7-0} (lb/year)	QNEC _{N-2412-7-0} (lb/quarter)
NOx	1,149	287.25
CO	313	78.25
VOC	60	15
PM ₁₀	33	8.25
SOx	1	0.25

2. Adjusted Increase in Permitted Emissions (AIPE)

The AIPE is used to determine if BACT is required for emissions units that are being modified. The proposed diesel fired I.C. engine is a new emissions unit. Therefore, the BACT requirements are based on the daily PE2 values calculated above and AIPE calculations are not necessary.

E. Facility Emissions

1. 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.

Permit Number	SSPE1 (lb/year) ⁽¹⁾				
	NOx	CO	VOC	PM ₁₀	SOx
N-2412-4-0	979	657	13	103	1
N-2412-6-0	2,361	211	186	35	2
SSPE1 Total	3,340	868	199	138	3

2. 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.

¹ The SSPE1 for is facility is calculated in Appendix F of this document.

ATC permit N-2412-7-0 will only operate when either one of the existing permit units is not operating. The worst case SSPE2 will occur when permit unit N-2412-4-0 is not operating; therefore, the emissions for permit unit N-2412-4-0 will be set equal to zero to determine the SSPE2 as follows:

SSPE2 (lb/year)					
Permit Number	NOx	CO	VOC	PM ₁₀	SOx
N-2412-4-0	0	0	0	0	0
N-2412-6-0	2,361	211	186	35	2
N-2412-7-0 (ATC Permit)	1,149	313	60	33	1
SSPE2 Total	3,510	524	246	68	3
Offset Threshold Levels	20,000	200,000	20,000	29,200	54,750
Offset Threshold Surpassed?	No	No	No	No	No

3. Rule 2201 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 3.23.2 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 the SSPE2 is necessary for ERCs.

Major Source Determination (lb/year)					
	NOx	CO	VOC	PM ₁₀	SOx
SSPE1	3,340	868	199	138	-3
SSPE2	3,510	524	246	68	3
Major Source Determination SSPE2	3,510	524	246	68	3
Major Source Threshold	20,000	200,000	20,000	140,000	140,000
Major Source	No	No	No	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.

4. Rule 2410 Major Source Determination

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
	NO2	VOC	SO2	CO	PM	PM ₁₀	CO _{2e}
Estimated Facility PE before Project Increase ⁽²⁾	1.67	0.1	0.002	0.43	0.07	0.07	125.2
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source	NO	NO	NO	NO	NO	NO	NO

As shown above, the facility is not an existing major source for PSD for at least one pollutant. Therefore the facility is not an existing major source for PSD.

5. Baseline Emissions

There are no Baseline Emissions (BE) for the new emissions unit associated with this project. Therefore, BE is equal to zero for all pollutants.

6. Stationary Source Increase in Permitted Emissions (SSIPE)

SSIPE is used to determine if a project triggers public notification (District Rule 2201, Section 5.4.5). District practice is to define this as follows:

$$\text{SSIPE (for any one pollutant)} = \text{SSPE2} - \text{SSPE1}$$

Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)
NOx	3,510	3,340	170
CO	524	868	0 ⁽³⁾ (-344)
VOC	246	199	47
PM ₁₀	68	138	0 ⁽³⁾ (-70)
SOx	3	3	0

F. 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 determined in Section VII.E.3 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.

² The estimated facility annual PE for NO₂ (calculated as NOx), VOC, SO₂ (calculated as SOx), CO, PM (assumed to be equal to PM₁₀), and PM₁₀ are based on the SSPE1 totals as determined in Appendix E. The facility annual PE for CO_{2e} is calculated in Appendix B.

³ Per District practice, negative values for SSIPE are set equal to zero.

G. Federal Major Modification:

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

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

H. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀
- Greenhouse gases (GHG): CO₂, N₂O, CH₄, HFCs, PFCs, and SF₆

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source. As determined in Section VII.E.3.b. above in this document, the facility is NOT an existing PSD Major Source.

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds:

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

Project PSD Major Source Determination (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Total PE from New and Modified Units ⁽⁴⁾	0.57	0.03	0.0005	0.16	0.017	0.017	72.4
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source	N	N	N	N	N	N	N

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

VIII. Compliance

Rule 2201 - New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT is required for the following actions: (1) Any new emissions unit with a potential to emit exceeding 2.0 pounds in any one day, (2) The relocation of an existing emissions unit from one stationary source to another with a potential to emit exceeding 2.0 pounds in any one day, (3) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding 2.0 pounds in any one day, and (4) Any new or modified emissions unit, in a stationary source project, which results in an SB-288 Major Modification or Federal Major Modification as defined in this rule. If the post project Stationary Source Potential to Emit (SSPE2) for Carbon Monoxide is less than 200,000 pounds per year, BACT is not required for Carbon Monoxide.

Best Available Control Technology (BACT) for Permit Units N-2412-7-0:

1. Applicability:

As discussed in Section I, the facility is proposing to install a new emergency standby IC engine. Additionally, as determined in Sections VII.F. and VII.G. 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 the new engine are compared to the BACT threshold levels in the following table:

⁴ The estimated project annual PE are based on the Annual PE2 totals as determined in above in Section VII.C.2. The project annual PE for CO2e is calculated in Appendix B.

New Emissions Unit BACT Applicability				
Pollutant	Daily PE _{2N-2412-7-0} (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/year)	BACT Triggered?
NO _x	551.6	> 2.0	n/a	Yes
SO _x	0.6	> 2.0	n/a	No
PM ₁₀	15.8	> 2.0	n/a	Yes
CO	150.4	> 2.0 and SSPE2 ≥ 200,000 lb/year	524	No
VOC	28.8	> 2.0	n/a	Yes

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

2. BACT Guidance:

BACT Guideline 3.1.1, which appears in Appendix C of this document, 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 D of this document, BACT is satisfied with:

- NO_x: Tier 2 certified engine.
- VOC: Tier 2 certified engine.
- PM₁₀: 0.15 g/bhp-hr or less.

B. Offsets

Offset Applicability

Since emergency internal combustion engines are exempt from the offset requirements of District Rule 2201 (Section 4.6.2), offsets are not required for this engine. Therefore, offset calculations are not necessary and will not be performed for this project.

C. Public Notification

1. Applicability

District Rule 2201, section 5.4, requires a public notification for the affected pollutants from the following types of projects:

- a. New Major Sources.
- b. SB 288 and Federal Major Modifications.
- c. New emission units with a PE > 100 lb/day of any one pollutant (IPE Notifications).
- d. Modifications with SSPE1 below an offset threshold and SSPE2 above an offset threshold on a pollutant by pollutant basis (Existing Facility Offset Threshold Exceedance Notification).
- e. New stationary sources with SSPE2 exceeding offset thresholds (New Facility Offset Threshold Exceedance Notification).
- f. Any permitting action with a SSIPE exceeding 20,000 lb/yr for any one pollutant (SSIPE Notice).

a. New Major Source

A New Major Source is a new facility, which is also a major source. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

b. SB-288 and Federal Major Modifications

As determined in Sections VII.F. and VII.G., this project does not trigger an SB-288 or Federal Major Modification; therefore, public noticing for SB-288 or Federal Major Modification purposes are not required.

c. PE > 100 lb/day

As determined in Section VII.C.2.A., the proposed project will result in the installation of a new emissions unit with a Potential to Emit (PE) > 100 lb/day for NO_x and CO. Therefore, public noticing will be required for PE > 100 lb/day purposes.

d. Existing Facility - Offset Threshold Notification

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

Pollutant	SSPE2 (lb/year)	Offset Threshold (lb/year)	Public Notice Required?
NO _x	3,510	20,000	No
CO	524	200,000	No
VOC	246	20,000	No
PM ₁₀	68	29,200	No
SO _x	3	54,750	No

Therefore, public noticing is not required for this project for reaching or surpassing the offset thresholds.

e. New Facility – Offset Threshold Notification

This is an existing facility. Therefore, this section does not require a public notification.

f. SSIPE > 20,000 lb/year

A notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/yr of any affected pollutant. As shown in Section VII.E.6. of this document, the SSIPE for all affected pollutants will be less than 20,000 pounds per year. Therefore, a SSIPE notification is not required.

2. Public Notice Action

As demonstrated above, the public noticing requirements are triggered for this project. Therefore, public notification and publication requirements as indicated in Section 5.5 of this rule will be required for this project.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.16.1 and 3.16.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. Therefore, the following conditions will be listed on the ATC permit to ensure compliance:

- *Emissions from this IC engine shall not exceed any of the following limits: 3.83 g-NO_x/bhp-hr, 1.04 g-CO/bhp-hr, or 0.20 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]*
- *Emissions from this IC engine shall not exceed 0.11 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]*

In addition, the DEL for SO_x is established by the sulfur content of the fuel being combusted in the engine. Therefore, the following condition will be listed on the ATC permit 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]*

E. Compliance Assurance

The following measures shall be taken to ensure continued compliance with District Rules.

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required for emergency IC engines powering an electric generator.

2. Monitoring

There are no monitoring requirements for emergency standby IC engines powering an electric generator.

3. Record Keeping

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

4. Reporting

There are no reporting requirements for emergency standby IC engines powering an electric generator.

F. Ambient Air Quality Analysis

Section 4.14.1 of Rule 2201 requires that an ambient air quality analysis (AAQA) be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of a State or National ambient air quality standard (AAQS). An AAQA will be performed for all New Source Review (NSR) public notice projects. As previously discussed this project requires that a public notice be performed prior to the issuance of an ATC. The Technical Services Division of the SJVAPCD conducted the required analysis. Refer to Appendix G of this document for the AAQA summary sheet.

The results from Criteria Pollutant Modeling are as follows:

Diesel ICE	1 Hour	3 Hours	8 Hours.	24 Hours	Annual
CO	NA ¹	X	NA ¹	X	X
NOx	NA ¹	X	X	X	Pass
SOx	NA ¹	NA ¹	X	NA ¹	Pass
PM ₁₀	X	X	X	NA ¹	Pass ²
PM _{2.5}	X	X	X	NA ¹	Pass ²

1. 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 are not required.

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

The Criteria Pollutant Modeling runs indicate that the emissions from the proposed equipment will not cause or significantly contribute to a violation of the State or National AAQS.

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

Pursuant to § 60.4200 of Subpart IIII, this engine is subject to this federal regulation. However, the District has not been delegated authorization to enforce the requirements of this regulation. The applicant will be so notified in a condition permit condition.

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)

Pursuant to §63.6585 of Subpart ZZZZ, this engine is subject to this federal regulation. However, the District has not been delegated authorization to enforce the requirements of 40 CFR 63 Subpart ZZZZ for non-Part 70 sources (Major Sources). The applicant will be so notified in a permit condition.

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 properly maintained. Therefore, the following condition will be listed on each ATC permit 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 E.

RMR Results				
Unit	Acute Hazard Index	Chronic Hazard Index	Cancer Risk	T-BACT Required?
N-2412-7-0	N/A	N/A	0.82 in a million	No

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

- *The PM₁₀ emissions rate shall not exceed 0.11 g/hp·hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]*
- *{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 other obstruction. [District Rule 4102]*
- *This 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 Rule 4702 and 17 CCR 93115]*
- *The engine shall only operate at 345 N. San Joaquin Street in Stockton, CA. [District Rules 2201 and 4102]*

Rule 4201 - Particulate Matter Concentration

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

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

The new engines have PM₁₀ emission factor less than 0.4 g/bhp-hr. Therefore, compliance is expected and the following condition will be listed on each ATC permit to ensure compliance:

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

Rule 4701 - Internal Combustion Engines – Phase 1

The requirements of District Rule 4702 are as stringent, or more stringent, to the requirements of District Rule 4701. Therefore, the proposed emergency internal combustion engine will comply with the requirements of District Rule 4702 and should also meet the requirements of District Rule 4701.

Rule 4702 - Internal Combustion Engines – Phase 2

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

District Rule 4702 Requirements Emergency Standby IC Engines	Proposed Method of Compliance with District Rule 4702 Requirements
<p>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.</p>	<p>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.</p>
<p>Emergency standby engines cannot be used to reduce the demand for electrical power when normal electrical power line service has not failed, or to produce power for the electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract.</p>	<p>The following conditions will be included on the permit:</p> <ul style="list-style-type: none"> • 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 Rules 4701 and 4702] • 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 Rules 4701 and 4702]
<p>The owner/operator must operate and maintain the engine(s) and any installed control devices according to the manufacturers written instructions.</p>	<p>The following conditions will be included on the permit:</p> <ul style="list-style-type: none"> • This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
<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"> • {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]

District Rule 4702 Requirements Emergency Standby IC Engines	Proposed Method of Compliance with District Rule 4702 Requirements
<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"> • 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 and 4702, and 17 CCR 93115] • The permittee shall maintain monthly records of the type of fuel purchased. [District Rules 4701 and 4702, and 17 CCR 93115] • 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 and 4702, and 17 CCR 93115]

Rule 4801 - Sulfur Compounds

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

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

n = moles SO₂

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

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

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

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

- {4258} 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 this site is located within 1,000 feet of the following school:

School Name: Stockton Collegiate International Elementary School
 Address: 321 E. Weber Avenue, Stockton, CA

Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is required. Prior to the issuance of the ATC for this equipment, notices will be provided to the parents/guardians of all students of the affected school, and will be sent to all residents within 1,000 ft of the site.

Since a school notice has been triggered (due to the above-listed school within 1,000 of the emission source), notices will also be provided to the parents/guardians of all students from all school sites within ¼ mile of the emission source. The following schools are within ¼ mile of the emission source:

School Name: Aspire Apex Academy
 Address: 444 N. American Street, Stockton, CA.

School Name: Stockton Collegiate International Secondary School
 Address: 1 N. Sutter Street, Stockton, CA.

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

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

Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators	Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements
Emergency engine(s) must be fired on CARB diesel fuel, or an approved alternative diesel fuel.	The applicant has proposed the use of CARB certified diesel fuel. The proposed permit condition, requiring the use of CARB certified diesel fuel, was included earlier in this evaluation under Rules 2201 and 4801.
The engine(s) must emit diesel PM at a rate less than or equal to 0.15 g/bhp-hr as specified in § 93115.6 (a)(3)(A) Table 1, Emissions Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines...	The applicant has proposed the use of an engine that is certified to the latest EPA Tier Certification level for the applicable horsepower range at the time of manufacture. Additionally, the proposed diesel PM emissions rate is less than or equal to 0.15 g/bhp-hr.

Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators	Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements
<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"> This 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 4701 and 4702, and 17 CCR 93115]
<p>New stationary emergency standby diesel-fueled CI engines (> 50 bhp) must meet the standards as specified in § 93115.6 (a)(3)(A) Table 1, Emissions Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines.</p>	<p>The applicant has proposed the use of an engine that is CARB certified to comply with the applicable engine horsepower range standards for the model year as specified in § 93115.6 (a)(3)(A) Table 1, which satisfies the ATCM.</p>
<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 the engine is not located within 500 feet of a K-12 school. Therefore, conditions prohibiting non-emergency usage of the engine during school hours will not be required on these permits.</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 this evaluation under Rule 4702.</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.

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

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

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

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

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

IX. Recommendation:

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct permit N-8866-1-0 subject to the permit conditions on the attached draft Authority to Construct permit in Appendix A.

X. Billing Information:

ATC Permit Number	Fee Schedule	Fee Description	Previous Fee Schedule
N-2412-7-0	3020-10-F	2,722 bhp IC Engine	None

XI. Appendices:

- Appendix A: Draft ATC Permit N-2412-7-0
- Appendix B: Facility and Project Annual PE for CO₂e Emissions
- Appendix C: District BACT Clearinghouse Guideline 3.1.1 for Emergency Diesel IC Engine
- Appendix D: Top Down BACT Analysis for ATC Permit N-2412-7-0
- Appendix E: I.C. Engine Emissions Data Sheet
- Appendix F: SSPE1 Calculations
- Appendix G: RMR & AAQA Results Summary

APPENDIX A
Draft ATC Permit N-2412-7-0

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-2412-7-0

LEGAL OWNER OR OPERATOR: PACIFIC BELL TELEPHONE CO (DBA AT&T CA)
MAILING ADDRESS: P O BOX 5095
SAN RAMON, CA 94583-0995

LOCATION: 345 N SAN JOAQUIN ST
STOCKTON, CA 95202

EQUIPMENT DESCRIPTION:
TRAILER-MOUNTED 2,722 BHP (INTERMITTENT) CATERPILLAR MODEL 3516C TIER 2 CERTIFIED DIESEL-FIRED IC ENGINE POWERING AN ELECTRIC GENERATOR.

CONDITIONS

1. This unit shall only be used to replace either permit units N-2412-4 or N-2412-6 when it is shut down for maintenance or repair. [District Rule 2201]
2. This unit shall only operate at 345 N. San Joaquin Street in Stockton, CA. [District Rules 2201 and 4102]
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {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]
6. {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]
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. 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]
9. 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]

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-2412-7-0 : May 20 2013 0:03AM - CHANK : Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

10. Emissions from this IC engine shall not exceed any of the following limits: 3.83 g-NOx/bhp-hr, 1.04 g-CO/bhp-hr, or 0.20 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
11. Emissions from this IC engine shall not exceed 0.11 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
12. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
13. 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 Rules 4701 and 4702, and 17 CCR 93115]
14. 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 Rules 4701 and 4702]
15. 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 Rules 4701 and 4702]
16. 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 and 4702, and 17 CCR 93115]
17. The permittee shall maintain monthly records of the type of fuel purchased. [District Rules 4701 and 4702, and 17 CCR 93115]
18. 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 and 4702, and 17 CCR 93115]
19. 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

APPENDIX B

Facility and Project Annual PE for CO2e Emissions

Facility Annual PE for CO₂e Emissions Determination:

The following table lists all sources of CO₂e emission sources at this facility along with the potential annual diesel fuel combustion rates before proposed project increases.

Facility CO ₂ e Emission Sources	
Permit Unit	Fuel Usage Rates
N-2412-4-0 (2,350 Bhp Diesel-Fired Emergency Standby IC Engine Powering an Electrical Generator)	2,420 gal/year ⁽⁵⁾
N-2412-6-0 (3,674 Bhp Diesel-Fired Emergency Standby IC Engine Powering an Electrical Generator)	8,590 gal/year ⁽⁶⁾
Total Diesel Fuel Usage Rate	11,010 gal/year

Project Annual PE for CO₂e Emissions Determination:

The following table lists all sources of CO₂e emission sources for this project along with the potential annual diesel fuel usage rate.

Project CO ₂ e Emission Sources	
ATC Permit Unit	Fuel Usage Rates
N-2412-7-0 (2,722 Bhp Diesel-Fired Emergency Standby IC Engine Powering an Electrical Generator)	6,365 gal/year ⁽⁷⁾
Total Natural Gas Usage Rate	6,365 gal/year

CO₂ Equivalent (CO₂e) Emission Factor:

The following emission factors and global warming potentials for diesel fuel are taken from the California Climate Change Action Registry (CCAR), Version 3.1, January, 2009 (Appendix C):

GHG Emission Factors (EF) and Global Warming Potentials (GWP)		
GHG Pollutant	EF _{Diesel} CO ₂ e	Global Warming Potential
CO ₂	22.3 lb/gal	1 lb-CO ₂ E/lb-CO ₂
CH ₄	0.006 lb/gal	23 lb-CO ₂ E/lb-CH ₄
N ₂ O	0.001 lb/gal	296 lb-CO ₂ E/lb-N ₂ O

The CO₂e emission factor is calculated below, using the GHG pollutant emission factors and the global warming potentials.

$$\begin{aligned}
 \text{EF}_{\text{Diesel}} \text{ CO}_2\text{e} &= 22.3 \text{ lb-CO}_2/\text{gal} \times 1 \text{ lb-CO}_2\text{E}/\text{lb-CO}_2 + 0.006 \text{ lb/gal} \times 23 \text{ lb-CO}_2\text{E}/\text{lb-CH}_4 \\
 &\quad + 0.001 \text{ lb/gal} \times 296 \text{ lb-CO}_2\text{E}/\text{lb-N}_2\text{O} \\
 &= \mathbf{22.734 \text{ lb-CO}_2\text{e}/\text{gallon}}
 \end{aligned}$$

⁵ Diesel Fuel Usage Rate = 121.0 gal/hr × 20 hr/year = 2,420 gal/year

⁶ Diesel Fuel Usage Rate = 171.8 gal/hr × 50 hr/year = 8,590 gal/year

⁷ Diesel Fuel Usage Rate = 127.3 gal/hr × 50 hr/year = 6,365 gal/year

Facility GHG Emission Calculations:

$$\begin{aligned} \text{Facility Annual PE}_{\text{Diesel}} &= 11,010 \text{ gal/year} \times 22.734 \text{ lb-CO}_2\text{e/gallon} \times 1 \text{ ton}/2,000 \text{ lb} \\ &= \mathbf{125.2 \text{ short ton-CO}_2\text{e/year}} \end{aligned}$$

Project GHG Emission Calculations:

$$\begin{aligned} \text{Project Annual PE}_{\text{Diesel}} &= 6,365 \text{ gal/year} \times 22.734 \text{ lb-CO}_2\text{e/MMBtu} \times 1 \text{ ton}/2,000 \text{ lb} \\ &= \mathbf{72.4 \text{ short ton-CO}_2\text{e/year}} \end{aligned}$$

APPENDIX C

BACT Clearinghouse Guideline 3.1.1 for Emergency Diesel IC Engine

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 contained 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.

***This is a Summary Page for this Class of Source**

APPENDIX D
Top-Down BACT Analysis for ATC Permit N-2412-7-0

Top-Down BACT Analysis for the Emergency IC Engine

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

1. BACT analysis for NO_x and VOC emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

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

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

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

40 CFR Parts 89 and 1039, which apply only to nonroad engines, do not directly apply because the proposed emergency engine does 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.

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.

Maximum Engine Power	Tier	Model Year(s)	PM	NMHC+NO _x	CO
50 ≤ HP < 75 (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 (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 (75 ≤ kW < 130)	3	2007	0.15 (0.20)	3.0 (4.0)	3.7 (5.0)
		2008+			
175 ≤ HP < 300 (130 ≤ kW < 225)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
300 ≤ HP < 600 (225 ≤ kW < 450)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			

Maximum Engine Power	Tier	Model Year(s)	PM	NMHC+NOx	CO
600 ≤ HP ≤ 750 (450 ≤ kW ≤ 560)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
HP > 750 (kW > 560)	2	2007	0.15 (0.20)	4.8 (6.4)	2.6 (3.5)
		2008+			

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

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

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

The proposed engine is rated at 2,722 bhp. 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

Ranking is not necessary since there is only one control option listed in Step 1.

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

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

2. BACT Analysis for PM₁₀ Emissions:

a. Step 1 – Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

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

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

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

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

b. Step 2 – Eliminate technologically infeasible options

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

c. Step 3 – Rank remaining options by control effectiveness

Ranking is not necessary since there is only one control option listed in Step 1.

d. Step 4 – Cost Effectiveness Analysis

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

e. Step 5 – Select BACT

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

APPENDIX E

I.C. Engine Emissions Data Sheet

 AIR RESOURCES BOARD	CATERPILLAR INC.	EXECUTIVE ORDER U-R-001-0401 New Off-Road Compression-Ignition Engines
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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 engine and emission control system 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	ACPXL78.1T2X	78.1	Diesel	8000
SPECIAL FEATURES & EMISSION CONTROL SYSTEMS			TYPICAL EQUIPMENT APPLICATION	
Direct Diesel Injection, Turbocharger, Charge Air Cooler, Smoke Puff Limiter and Engine Control Module			Generator	

The engine models and codes are attached.

The following are the exhaust certification standards (STD) and certification levels (CERT) for hydrocarbon (HC), oxides of nitrogen (NO_x), or non-methane hydrocarbon plus oxides of nitrogen (NMHC+NO_x), 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	NO _x	NMHC+NO _x	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
		CERT	-	-	5.4	1.4	0.15	-	-	-

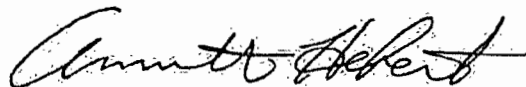
0.120 3.83 4.027 1.044 0.112 (g/bhp-hr)

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 16 day of December 2009.



Annette Hebert, Chief
 Mobile Source Operations Division

Engine Model Summary Template

ATTACHMENT 1 OF 1

U-R-001-0401
12/16/10

Engine Family	1.Engine Code	2.Engine Model	3.BHP@RPM (SAE Gross)	4.Fuel Rate: mm/stroke @ peak HP (for diesel only)	5.Fuel Rate: (lbs/hr) @ peak HP (for diesels only)	6.Torque @ RPM (SEA Gross)	7.Fuel Rate: mm/stroke@peak torque	8.Fuel Rate: (lbs/hr)@peak torque	9.Emission Control Device Per SAE J1930
ACPXL78.1T2X	1	3516C	2150@1200	690.0	743.0	9403@1200	NA	NA	EM,DI,TC,ECM
ACPXL78.1T2X	2	3516C	1855@1200	589.8	635.0	8113@1200	NA	NA	EM,DI,TC,ECM
ACPXL78.1T2X	3	3516C	2722@1800	560	1273 501/hr 904	7942@1800	NA	NA	EM,DI,TC,ECM
ACPXL78.1T2X	4	3516C	1926@1500	516.1	694.4	6743@1500	NA	NA	EM,DI,TC,ECM
ACPXL78.1T2X	5	3516C	2602@1800	556.5	898.9	7591@1800	NA	NA	EM,DI,TC,ECM

Engine Model Summary Template

ATTACHMENT 1 OF 1

U-R-001-0401

12/08/09

Engine Family	1.Engine Code	2.Engine Model	3.BHP@RPM (SAE Gross)	4.Fuel Rate: mm/stroke @ peak HP (for diesel only)	5.Fuel Rate: (lbs/hr) @ peak HP (for diesels only)	6.Torque @ RPM (SEA Gross)	7.Fuel Rate: mm/stroke@peak torque	8.Fuel Rate: (lbs/hr)@peak torque	9.Emission Control Device Per SAE J1930
ACPXL78.1T2X	1	3516C	2150@1200	690.0	743.0	9403@1200	NA	NA	SP CAC EM,DI,TC,ECM
ACPXL78.1T2X	2	3516C	1855@1200	589.8	635.0	8113@1200	NA	NA	" EM,DI,TC,ECM
ACPXL78.1T2X	3	3516C	2722@1800	560	904	7942@1800	NA	NA	" EM,DI,TC,ECM
ACPXL78.1T2X	4	3516C	2100@1500	521.5	694	7353@1500	NA	NA	" EM,DI,TC,ECM
ACPXL78.1T2X	5	3516C	2602@1800	556.5	898.9	7591@1800	NA	NA	" EM,DI,TC,ECM

APPENDIX F

SSPE1 Calculations

SSPE1 Calculations

Annual PE Calculations for Permit N-2412-4-0:

The annual PE for this emergency standby IC engine is based on the maximum operating limit for 20 hours per year (maximum non-emergency use of this emergency standby engine as limited by a permit condition). The emission factors for NO_x, CO, VOC, and PM₁₀ are based on the emission factors from Project #N-960156. The SO_x emission factor will be determined using mass balance with a maximum sulfur content of 0.0015% by weight. Therefore:

$$\begin{aligned}
 EF_{SO_x} &= 0.000015 \text{ lbm S/lbm fuel} \times 7.1 \text{ lbm fuel/gal fuel} \times 453.6 \text{ g/lbm} \\
 &\quad \times 2 \text{ lbm SO}_2 \text{ exhaust/1 lbm S in fuel} \times 121.0 \text{ gal/hr} \\
 &= 12 \text{ g/hr}
 \end{aligned}$$

$$\text{Annual PE}_{N-2412-4-0} = \text{Emission Factor (g/hr)} \times 20 \text{ hr/year} \times 1 \text{ lbm}/453.6 \text{ g}$$

Pollutant	Emission Factor (g/hr)	Annual PE _{N-2412-4-0} (lb/year)
NO _x	22,200	979
CO	14,900	657
VOC	300	13
PM ₁₀	2,340	103
SO _x	12	1

Annual PE Calculations for Permit N-2412-6-0:

The annual PE for this emergency standby IC engine is based on the maximum operating limit for 50 hours per year (maximum non-emergency use of this emergency standby engine as limited by a permit condition). The emission factors for NO_x, CO, VOC, and PM₁₀ are based on the emission factors from Project #N-1031674. The SO_x emission factor will be determined using mass balance with a maximum sulfur content of 0.0015% by weight. Therefore:

$$\begin{aligned}
 EF_{SO_x} &= 0.000015 \text{ lbm S/lbm fuel} \times 7.1 \text{ lbm fuel/gal fuel} \times 453.6 \text{ g/lbm} \\
 &\quad \times 2 \text{ lbm SO}_2 \text{ exhaust/1 lbm S in fuel} \times 171.8 \text{ gal/hr} \times 1/3,674 \text{ hp} \\
 &= 0.0045 \text{ g/hp-hr}
 \end{aligned}$$

$$\text{Annual PE}_{N-2412-6-0} = \text{Emission Factor (g/hp-hr)} \times 3,674 \text{ hp} \times 50 \text{ hr/year} \times 1 \text{ lbm}/453.6 \text{ g}$$

Pollutant	Emission Factor (g/hp-hr)	Annual PE _{N-2412-6-0} (lb/year)
NO _x	5.83	2,361
CO	0.52	211
VOC	0.46	186
PM ₁₀	0.087	35
SO _x	0.0045	2

Pre-Project Stationary Source Potential to Emit (SSPE1):

Based on the above calculated annual PE for the existing permit units, the SSPE1 is the following:

$$\text{SSPE1} = \text{Annual PE}_{\text{N-2412-4-0}} + \text{Annual PE}_{\text{N-2412-6-0}}$$

SSPE1 (lb/year)					
Permit Number	NOx	CO	VOC	PM ₁₀	SOx
N-2412-4-0	979	657	13	103	1
N-2412-6-0	2,361	211	186	35	2
Total	3,340	868	199	138	3

APPENDIX G
RMR & AAQA Results Summary

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Kai Chan - Permit Services
 From: Cheryl Lawler - Permit Services
 Date: May 28, 2013
 Facility Name: Pacific Bell Telephone Company
 Location: 345 N. San Joaquin Street, Stockton
 Application #(s): N-2412-7-0
 Project #: N-1130544

A. RMR SUMMARY

RMR Summary			
Categories	Emergency Diesel ICE (Unit 7-0)	Project Totals	Facility Totals
Prioritization Score	N/A ¹	N/A ¹	>1
Acute Hazard Index	N/A ²	N/A ²	0.00
Chronic Hazard Index	N/A ²	N/A ²	0.00
Maximum Individual Cancer Risk	8.2E-07	8.2E-07	1.68E-06
T-BACT Required?	No		
Special Permit Conditions?	Yes		

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

Proposed Permit Conditions

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

Unit 7-0

1. The PM10 emissions rate shall not exceed **0.112 g/bhp-hr** based on US EPA certification using ISO 8178 test procedure. [District Rules 2201]
2. 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]
3. 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]
4. The engine shall only operate at 345 N. San Joaquin Street, in Stockton.

B. RMR REPORT

I. Project Description

Technical Services received a request on May 28, 2013, to perform an Ambient Air Quality Analysis (AAQA) and a Risk Management Review (RMR) for a 2722 bhp emergency diesel IC engine.

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			
Source Type	Point	Location Type	Urban
BHP	2722	PM ₁₀ g/hp-hr	0.112
Closest Receptor (m)	7.62	Quad	2
Max Hours per Year	50	Type of Closest Receptor	Business

Technical Services also performed modeling for criteria pollutants NO_x, SO_x, PM₁₀, and PM_{2.5}; as well as the RMR. The emission rates used for criteria pollutant modeling were 1149 lb/yr NO_x, 1.4 lb/yr SO_x, 33 lb/yr PM₁₀, and 33 lb/yr PM_{2.5}.

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 ¹	X	NA ¹	X	X
NO _x	NA ¹	X	X	X	Pass
SO _x	NA ¹	NA ¹	X	NA ¹	Pass
PM ₁₀	X	X	X	NA ¹	Pass ²
PM _{2.5}	X	X	X	NA ¹	Pass ²

*Results were taken from the attached PSD spreadsheet.

¹The 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.

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

III. Conclusions

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

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

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

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

Attachments:

RMR Request Form & Related Documents
DICE Screening Risk Tool
AAQA Results
Facility Summary