



AUG 04 2014

David Smith
Owens & Minor
18520 Stanford Road
Tracy, CA 95377-9708

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: N-9041
Project Number: N-1142749

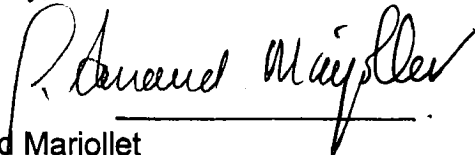
Dear Mr. Smith:

Enclosed for your review and comment is the District's analysis of Owens & Minor's application for an Authority to Construct for the permitting of an existing 752 bhp diesel-fired emergency engine powering an electrical generator, located at 18520 Stanford Road, Tracy, 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. Fred Cruz of Permit Services at (209) 557- 6456.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM:fjc/ya

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Facility Name: Owens & Minor
Mailing Address: 18520 Stanford Road
Tracy, CA 95377-9708
Contact Person: David Smith
Telephone: (209) 833-5539
Email: david.smith2@owens-minor.com
Application No: N-9041-1-0
Project No: N-1142749
Complete: July 24, 2014

Date: July 28, 2014
Engineer: Fred Cruz
Lead Engineer: Mark Schonhoff

I. Proposal:

Owens & Minor submitted an Authority to Construct application to permit an existing 752 bhp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator. Per the applicant, this emergency engine was installed in 2011 without first obtaining an ATC permit.

II. Applicable Rules:

Rule 2201 New and Modified Stationary Source Review Rule (4/21/2011)
Rule 2410 Prevention of Significant Deterioration (6/16/2011)
Rule 2520 Federally Mandated Operating Permits (6/21/2001)
Rule 4001 New Source Performance Standards (4/14/1999)
Rule 4002 National Emission Standards for Hazardous Air Pollutants (5/20/2004)
Rule 4101 Visible Emissions (2/17/2005)
Rule 4102 Nuisance (12/17/1992)
Rule 4201 Particulate Matter Concentration (12/17/1992)
Rule 4701 Stationary Internal Combustion Engines – Phase 1 (8/21/2003)
Rule 4702 Stationary Internal Combustion Engines – Phase 2 (8/18/2011)
Rule 4801 Sulfur Compounds (12/17/1992)
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:

The facility is located at 18520 Stanford Road, Tracy, CA.

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

IV. Process Description:

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

V. Equipment Listing:

N-9041-1-0: 752 BHP MTU DETROIT DIESEL MODEL 10V 1600 EMERGENCY ENGINE (TIER 2 CERTIFIED) POWERING AN ELECTRICAL GENERATOR.

VI. Emission Control Technology Evaluation:

The applicant has proposed to install a 2011 Model Year Tier 2 certified diesel-fired IC engine that is 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 B 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) 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 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_x:

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
EPA F-factor (adjusted to 60 °F):	9,051 dscf/MMBtu
Fuel heating value:	137,000 Btu/gal
BHP to Btu/hr conversion:	2,542.5 Btu/bhp-hr
Thermal efficiency of engine:	commonly ≈ 35%
Fuel rate:	39.9 gal/hr (see below)

Fuel rate calculated as follows:

$$\text{Fuel rate} = \frac{(\text{BHP rating})(\text{BHP to Btu/hr conversion})}{(\text{Fuel heating value})(\text{Thermal efficiency of engine})}$$

$$\frac{(752 \text{ bhp})(2,542.5 \text{ Btu/hr})}{(137,000 \text{ Btus/hr})(0.35)} = 39.9 \text{ gals/hr}$$

B. Emission Factors:

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

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

This 752 bhp engine is a Tier 2 certified IC engine and the applicant supplied the combined NO_x + VOC emissions factor as 4.77 g/bhp-hr (6.4 g/kW-hr). Therefore, the NO_x and VOC emissions factors are calculated as follows:

$$\begin{aligned} \text{NO}_x \text{ (g/bhp-hr)} &= \text{NO}_x + \text{VOC (g/bhp-hr)} \times (4.5 \text{ g/bhp-hr} \div 4.8 \text{ g/bhp-hr}) \\ \text{NO}_x \text{ g/bhp-hr} &= 4.77 \text{ g/bhp-hr} \times (4.5 \text{ g/bhp-hr} \div 4.8 \text{ g/bhp-hr}) \\ \text{NO}_x &= 4.47 \text{ g/bhp-hr} \end{aligned}$$

$$\begin{aligned} \text{VOC (g/bhp-hr)} &= \text{NO}_x + \text{VOC (g/bhp-hr)} \times (0.3 \text{ g/bhp-hr} \div 4.8 \text{ g/bhp-hr}) \\ \text{VOC g/bhp-hr} &= 4.77 \text{ g/bhp-hr} \times (0.3 \text{ g/bhp-hr} \div 4.8 \text{ g/bhp-hr}) \\ \text{VOC} &= 0.30 \text{ g/bhp-hr} \end{aligned}$$

Pollutant	Emission Factor (g/bhp-hr)	Source
NO _x	4.47	Engine manufacturer
CO	2.61	Engine manufacturer
VOC	0.30	Engine manufacturer
PM ₁₀	0.149	Engine manufacturer
SO _x	0.005	Calculated below

The emission factor for SO_x may be calculated based on the current CARB standard for diesel sulfur content, which is 15 ppm by weight.

$$\frac{0.000015 \text{ lb - S}}{\text{lb - fuel}} \times \frac{7.1 \text{ lb - fuel}}{\text{gallon}} \times \frac{2 \text{ lb - SO}_2}{1 \text{ lb - S}} \times \frac{1 \text{ gal}}{137,000 \text{ Btu}} \times \frac{1 \text{ bhp input}}{0.35 \text{ bhp out}} \times \frac{2,542.5 \text{ Btu}}{\text{bhp - hr}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.005 \frac{\text{g - SO}_x}{\text{bhp - hr}}$$

C. Calculations:

1. Pre- Project Emissions (PE1):

This is a new emissions unit and PE1 will equal zero for all pollutants.

2. Post Project PE (PE2):

The potential to emit emissions from this emergency IC engine is based on the maximum operating capacity of the engine for 24 hours per day. The following calculation for NO_x emissions is representative of emission calculations for all pollutants. Annual emissions are based on 50 hours per year for non-emergency operation.

$$\begin{aligned} \text{NO}_x: & 4.47 \text{ g/hp-hr} \times 752 \text{ bhp} \times \text{lb}/453.6 \text{ g} \\ \text{NO}_x: & 7.41 \text{ lb/hr, } 177.8 \text{ lb/day, } 371 \text{ lb/yr} \\ \text{CO:} & 4.33 \text{ lb/hr, } 103.8 \text{ lb/day, } 216 \text{ lb/yr} \\ \text{VOC:} & 0.50 \text{ lb/hr, } 11.9 \text{ lb/day, } 25 \text{ lb/yr} \\ \text{PM}_{10}: & 0.25 \text{ lb/hr, } 5.9 \text{ lb/day, } 12 \text{ lb/yr} \end{aligned}$$

SO_x: 0.01 lb/hr, 0.2 lb/day, 0.4 lb/yr¹

	NO _x	CO	VOC	PM ₁₀	SO _x
Daily PE	177.8	103.8	11.9	5.9	0.2
Annual PE	371	216	25	12	0

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

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

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

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

Post Project Stationary Source Potential to Emit (SSPE2) (lb/year)					
Permit No.	NO _x	CO	VOC	PM ₁₀	SO _x
N-9041-1-0	371	216	25	12	0
Total	371	216	25	12	0
Major Source Threshold	20,000	200,000	20,000	140,000	140,000
Major Source?	No	No	No	No	No

*Per the applicant, the emergency engine covered by ATC N-4839-2-0 will not be installed.

5. Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following are not included:

- any ERCs associated with the stationary source

¹ Per District Policy APR 1105, Use of Significant Figures, annual emissions less than 0.5 lb are set to zero.

- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Facility emissions pre-project	0	0	0	0	0
Facility emissions – post project	371	0	12	216	25
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No

The facility is not an existing Major Source and is not becoming a Major Source as a result of this project.

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)							
	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀	CO _{2e}
Estimated Facility PE before Project Increase	0	0	0	0	0	0	0
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	N	N	N	N	N	N	N

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

6. Baseline Emissions (BE):

BE = Pre-project Potential to Emit for:

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

Otherwise, BE will equal the Historic Actual Emissions (HAE), calculated pursuant to Section 3.22 of District Rule 2201.

As shown in Section VII.C.5 above, the facility is not a Major Source for any pollutant. Therefore, Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

7. SB 288 Major Modification:

SB 288 Major Modification is defined in Rule 2201. As discussed in Section VII.C.5 above, the facility is not a Major Source for any pollutant. Therefore, the project does not constitute a SB 288 Major Modification.

8. Federal Major Modification:

Federal Major Modification is defined in Rule 2201. As discussed in Section VII.C.5 above, the facility is not a Major Source for any pollutant. Therefore, the project does not constitute a Federal Major Modification.

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 C.

10. 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 applicability evaluation consists of determining whether the facility is an existing PSD Major Source. This facility is not an existing PSD Major source (See Section VII.C.5 of this document).

Since the facility is NOT an existing PSD Major 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 the 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.

PSD Major Source Determination: Potential to Emit (tons/year)							
	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀	CO _{2e} ²
Total PE from New and Modified Units	0.19	0.01	0	0.11	0.006	0.006	7.75
PSD Major Source threshold	250	250	250	250	250	250	100,000
New 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)

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

² GHG emissions equal: 50 hr/yr x 752 bhp-hr x 0.000187 metric tons-CO_{2e}/bhp-hr = 7.03 metric tons CO_{2e}
 7.03 metric tons- CO_{2e} x 2,205 lbs/metric ton = 15,501 lb- CO_{2e}
 15,501 lb- CO_{2e} + 2,000 lb/ton = 7.75 tons- CO_{2e}

- d) Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.
 *Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2.0 lb/day

Since this engine is a new emissions unit, the daily emissions are compared to the BACT thresholds in the following table. The daily emissions for this emergency engine are as follows:

New Emissions Unit BACT Applicability				
Pollutant	Daily Emissions for unit -1-0 (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
NO _x	177.8	> 2.0	N/A	Yes
SO _x	0.2	> 2.0	N/A	No
PM ₁₀	5.9	> 2.0	N/A	Yes
CO	103.8	> 2.0 and SSPE2 ≥ 200,000 lb/yr	216	No
VOC	11.9	> 2.0	N/A	Yes

BACT is triggered for NO_x, VOC and PM₁₀ emissions.

2. BACT Guideline:

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

NO_x, VOC: Tier 2 engine
 PM₁₀: 0.15 g/bhp-hr

B. Offsets:

Per Section 4.6.2 of Rule 2201, emergency IC engines are exempt from offset requirements. Therefore, offset calculations are not required.

C. Public Notification:

1. Applicability:

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source.

This is a new facility and does not become a Major Source as a result of this project and Public Notice is not required.

- b. Major Modifications

As previously demonstrated, this project is not a Major Modification.

- c. Any new emissions unit with a Potential to Emit greater than 100 lb/day for any one pollutant

As previously demonstrated, daily emissions for NO_x and CO exceed 100 lb/day and Public Notice is required.

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

As previously calculated, there are no offset thresholds that are surpassed.

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

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

2. Public Notice Action:

As discussed above, public noticing is required for this project since the daily emissions of NO_x and CO emissions are greater than 100 lbs/day.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. Therefore, the following conditions will be listed on the ATC to ensure compliance:

- Emissions from this IC engine shall not exceed any of the following limits: 4.47 g-NO_x/bhp-hr, 2.61 g-CO/bhp-hr, or 0.30 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- Emissions from this IC engine shall not exceed 0.149 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:

Additional monitoring is not required to demonstrate compliance with Rule 2201.

3. Recordkeeping:

Recordkeeping is required to demonstrate compliance with the offset, public notification, and daily emission limit requirements of Rule 2201. As required by District Rule 4702, *Stationary Internal Combustion Engines - Phase 2*, each C 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:

Additional reporting is not required to ensure compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA):

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

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

Rule 2410 Prevention of Significant Deterioration

As shown above, this facility is not an existing PSD major source. Also, this project's potential emissions do not exceed any PSD major source thresholds (see VII.C.10). Therefore, Rule 2410 is not applicable to this project.

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 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 Engines (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 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 Appendix E.

RMR Summary			
Categories	Emergency Diesel ICE (Unit 1-0)	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	2.6E-07	2.6E-07	2.6E-07
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.

The individual cancer risk associated with the operation of the proposed emergency diesel IC engine is **2.6E-07**; which is less than the 1 in a million threshold. In accordance with the District's Risk Management Policy, the project is approved as proposed **without** Toxic Best Available Control Technology (T-BACT).

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

Unit # 1-0:

1. The PM10 emissions rate shall not exceed **0.149** g/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102; 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]
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]

Rule 4201 Particulate Matter Concentration

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

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

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

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

Rule 4701 Internal Combustion Engines – Phase 1

District Rule 4701 is applicable to diesel-fired emergency standby or emergency IC engines. Rule 4702 is at least as stringent as this rule in all aspects, therefore, compliance with that rule will ensure compliance with Rule 4701.

Rule 4702 Internal Combustion Engines – Phase 2

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

District Rule 4702 Requirements Emergency Standby IC Engines	Proposed Method of Compliance with District Rule 4702 Requirements
Operation of emergency standby engines is limited to 100 hours or less per calendar year for non-emergency purposes, verified through the use of a non-resettable elapsed operating time meter.	The Air Toxic Control Measure for Stationary Compression Ignition Engines (Stationary ATCM) limits this engine maintenance and testing to 50 hours/year. Thus, compliance is expected.
Emergency standby engines cannot be used to reduce the demand for electrical power when normal electrical power line service has not failed, or to produce power for the electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract.	The following conditions will be included on the permit: <ul style="list-style-type: none"> • {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rules 4701 and 4702] • {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rules 4701 and 4702]
The owner/operator must monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.	The following condition will be included on the permit: <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:

	<p>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 Rules 4701 and 4702]</p>
<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"> • {3496} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] • The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] • {3475} All records shall be maintained and retained on-site for a minimum of five 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 (universal gas constant) = $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot \text{°R}}$

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

Since 1.0 ppmv is \leq 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 this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

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

The following table demonstrates how the proposed engine 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 engines 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.
Engines must emit diesel PM at a rate less than or equal to 0.15 g/bhp-hr or must meet the diesel PM standard, as specified in the off-road compression ignition standards for off-road engines with the same maximum rated power (17 CCR 93115)	The applicant has proposed the use of an engine that is certified to the applicable EPA Tier Certification level for the applicable horsepower range, guaranteeing compliance with the emission standards of Subpart IIII. Additionally, the proposed diesel PM emissions rate is less than or equal to 0.15 g/bhp-hr.
The engine may not be operated more than 50 hours per year for maintenance and testing purposes.	The following condition will be included on the permit: <ul style="list-style-type: none"> • This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702 & 17 CCR 93115]
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	The District has verified that this engine is not located within 500' of a school.

<p>maintenance and testing between 7:30 AM and 3:30 PM</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.

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

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

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

IX. Recommendation:

Issue Authority to Construct N-9041-1-0 upon completion of the 30 day NSR Public Notice period and subject to the permit conditions on the attached Authority to Construct in Appendix A.

X. Billing Information:

Billing Schedule			
Permit Number	Fee Schedule	Fee Description	Fee Amount
N-9041-1-0	3020-10-D	752 bhp IC engine	\$479

Appendices:

- A. Authority to Construct permit N-9041-1-0
- B. Emissions Data
- C. QNEC Calculations
- D. BACT Guideline and BACT Analysis
- E. HRA Summary

Appendix A

Authority to Construct permit N-9041-1-0

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-9041-1-0

LEGAL OWNER OR OPERATOR: OWENS & MINOR
MAILING ADDRESS: 18520 STANFORD RD
TRACY, CA 95377-9708

LOCATION: 18520 STANFORD RD
TRACY, CA 95377

EQUIPMENT DESCRIPTION:
752 BHP MTU DETROIT DIESEL MODEL 10V 1600 DIESEL-FIRED (TIER 2 CERTIFIED) EMERGENCY ENGINE
POWERING AN ELECTRICAL GENERATOR.

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. {4749} This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115]
6. {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]
7. Emissions from this IC engine shall not exceed any of the following limits: 4.47 g-NOx/bhp-hr, 2.61 g-CO/bhp-hr, or 0.30 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
8. Emissions from this IC engine shall not exceed 0.149 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

DRAFT

Arnaud Marjolle, Director of Permit Services

N-9041-1-0 Jul 28 2014 9:20AM - CRUZP Joint Inspection NOT Required

9. {4261} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
10. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
11. {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
12. {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
13. {3496} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
14. {4773} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702 and 17 CCR 93115]
15. {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
16. {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]
17. 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

Emissions Data Sheet

Technical Sales Document

- Product Data -



Date 4/25/2014

21. Exhaust emissions

No.	Description	Index	Value	Unit
307	Regulation: "TA-Luft" (Edition 1986) - CP Nitric oxide (NOx) (5% O2)	R	-	mg/m³n
308	Regulation: "TA-Luft" (Edition 1986) - CP Carbon monoxide (CO) (5% O2)	R	-	mg/m³n
309	Regulation: "TA-Luft" (Edition 1986) - CP Unburned hydrocarbons (HC)	R	-	mg/m³n
310	Regulation: "TA-Luft" (Edition 1986) - CP Dust (5% O2)	R	-	mg/m³n
366	Regulation: "TA-Luft" (Edition 1986) - CP Formaldehyde (5% O2)	R	-	mg/m³n
320	Regulation: US EPA "Nonroad" (40 CFR 89 - Tier 2 -) Nitric oxide (NOx) + unburned hydrocarbons (HC)	R	<6.4	g/kWh
321	Regulation: US EPA "Nonroad" (40 CFR 89 - Tier 2 -) Carbon monoxide (CO)	R	<3.5	g/kWh
323	Regulation: US EPA "Nonroad" (40 CFR 89 - Tier 2 -) Particulates	R	<0.2	g/kWh
389	Regulation: US EPA "Nonroad" (40 CFR 89 - Tier 3 -) Nitric oxide (NOx) + unburned hydrocarbons (HC)	R	-	g/kWh
390	Regulation: US EPA "Nonroad" (40 CFR 89 - Tier 3 -) Carbon monoxide (CO)	R	-	g/kWh
391	Regulation: US EPA "Nonroad" (40 CFR 89 - Tier 3 -) Particulates	R	-	g/kWh
392	Regulation: EU "Nonroad" (97/68/EC-2004/26/EC - Stage IIIA -) Nitric oxide (NOx) + unburned hydrocarbons (HC)	R	-	g/kWh
393	Regulation: EU "Nonroad" (97/68/EC-2004/26/EC - Stage IIIA -) Carbon monoxide (CO)	R	-	g/kWh
427	Regulation: EU "Nonroad" (97/68/EC-2004/26/EC - Stage IIIA -) Particulates	R	-	g/kWh
141	Exhaust volume flow, dry - CP (standard conditions)	R	-	m³/h
143	Exhaust mass flow - CP (reference conditions)	R	-	kg/h

Please consider the explanations on the last page.

19/23

Appendix C

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

Using the emission calculations in this evaluation, PE_{quarterly} and BE_{quarterly} can be calculated as follows:

This calculation is required for application emission profile purposes. It is assumed that the unit's annual emissions are evenly distributed throughout the year as follows: $\Delta PE \text{ (lb/qtr)} = PE \text{ (lb/yr)} \div 4 \text{ qtr/yr}$.

N-9041-1-0:

$\Delta PE_{NOx} = 371 \text{ lb-NOx/year} - 0 \text{ lb-NOx/year} = 371 \text{ lb/year}$

$\Delta PE_{CO} = 216 \text{ lb-CO/year} - 0 \text{ lb-CO/year} = 216 \text{ lb/year}$

$\Delta PE_{VOC} = 25 \text{ lb-VOC/year} - 0 \text{ lb-VOC/year} = 25 \text{ lb/year}$

$\Delta PE_{PM10} = 12 \text{ lb-PM10/year} - 0 \text{ lb-PM10/year} = 12 \text{ lb/year}$

$\Delta PE_{SOx} = 0 \text{ lb-SOx/year} - 0 \text{ lb-SOx/year} = 0 \text{ lb/year}$

	Quarter 1	Quarter 2	Quarter 3	Quarter 4
NOx	92	93	93	93
CO	54	54	54	54
VOC	6	6	6	7
PM₁₀	3	3	3	3
SOx	0	0	0	0

Appendix D

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 NO_x and VOC emissions:

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, 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.

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

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

Therefore, the most stringent applicable emission standards are those listed in the CARB ATCM (Table 1). For IC engines rated greater than 750 hp the highest Tier required is Tier 2.

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

The proposed engine is rated at 752 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 NO_x 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/bhp-hr. Additionally, the ATCM requires a PM emission standard of 0.15 g/bhp-hr for all new emergency diesel IC engines.

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

b. Step 2 - Eliminate technologically infeasible options

The control option listed in Step 1 is technologically feasible.

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 the control of PM₁₀ emissions is the use of an engine with an emission factor of 0.15 g/bhp-hr, or less. The applicant is proposing an engine that meets this requirement. Therefore, BACT will be satisfied.

Appendix E

HRA Summary

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Fred Cruz - Permit Services

From: Cheryl Lawler - Permit Services

Date: July 24, 2014

Facility Name: Owens & Minor

Location: 18520 Stanford Road, Tracy

Application No: N-9041-1-0

Project No: N-1142749

A. RMR SUMMARY

RMR Summary			
Categories	Emergency Diesel ICE (Unit 1-0)	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	2.6E-07	2.6E-07	2.6E-07
T-BACT Required?	No		
Special Permit Conditions?	Yes		

1 Prioritization for this unit was not conducted since it has been determined that all diesel-fired IC engines will result in a prioritization score greater than 1.0.

2 Acute and Chronic Hazard Indices were not calculated since there is no risk factor, or the risk factor is so low that the risk has been determined to be insignificant for this type of unit.

Proposed Permit Conditions

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

Unit 1-0

1. The PM10 emissions rate shall not exceed **0.149 g/bhp-hr** based on US EPA certification using ISO 8178 test procedure. [District Rules 2201]
2. {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] N
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]

B. RMR REPORT

I. Project Description

Technical Services received a request on July 23, 2014, to perform an Ambient Air Quality Analysis (AAQA) and a Risk Management Review (RMR) for a 752 bhp emergency diesel IC engine powering an electrical generator.

II. Analysis

Diesel exhaust emissions and the Cancer Risk from the engine were calculated using the District approved DICE spreadsheet.

The following parameters were used for the review:

Analysis Parameters			
PM ₁₀ g/hp-hr	0.149	Source Type	Point
BHP	752	Stack Diameter (m)	0.15
Closest Receptor (m)	91.44	Stack Height (m)	3.35
Max Hours per Year	50	Stack Gas Temp. (K)	734
Location Type	Rural	Stack Gas Velocity (m/s)	93.73

Technical Services also performed modeling for criteria pollutants NO_x, SO_x, and PM₁₀; as well as the RMR. The emission rates used for criteria pollutant modeling were 371 lb/yr NO_x, 0.4 lb/yr SO_x, and 12 lb/yr PM₁₀.

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

*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).

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 & Attachments
DICE Spreadsheet
AAQA Results
Facility Summary
AERMOD Non-Regulatory Option Checklist