



JUL 13 2016

Dominic Patino
Bidart Dairy III LLC
25820 Stockdale Hwy
Bakersfield, CA 93311

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: S-5898
Project Number: S-1161488

Dear Mr. Patino:

Enclosed for your review and comment is the District's analysis of Bidart Dairy III LLC's application for an Authority to Construct for a natural gas-fired IC engine, at 25820 Stockdale Hwy, Bakersfield, 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. Richard Edgehill of Permit Services at (661) 392-5617.

Sincerely,

for Arnaud Marjollet
Director of Permit Services

AM:rue

Enclosures

cc: Tung Le, CARB (w/ enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District

Natural Gas Fired Agricultural IC Engine with Certified CIC Altronic Add-On Control System for District Rule 4702 Compliance

Facility Name: Bidart Dairy III LLC

Date: June 16, 2016

Mailing Address: 25820 Stockdale Hwy
Bakersfield, CA 93311

Engineer: Richard Edgehill
Lead Engineer: Steve Davidson

Location Address: 25820 Stockdale Hwy
Bakersfield, CA

Contact Person: Dominic Patino

Telephone: (661) 333-7776

Fax: (661) 397-7802

Application #(s): S-5898-11-0

Project #: S-1161488

Deemed Complete: June 7, 2016

I. Proposal

Bidart Dairy III LLC is applying for an Authority to Construct (ATC) permit for the installation of one 380 hp natural gas-fired engines powering a water pump. The IC engine is equipped with District-certified controls for NOx and VOC emissions (please see Emissions Control Technology Evaluation for details).

The increase in emissions triggers BACT for NOx and VOC. Public notice is required. Offsets are not required.

The source is not a Major Source and therefore Rules 2420 and 2530 are not applicable.

II. Applicable Rules

Rule 1070 Inspections (12/17/92)
Rule 2201 New and Modified Stationary Source Review Rule (2/18/16)
Rule 2410 Prevention of Significant Deterioration (6/16/11)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emissions 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 4301 Fuel Burning Equipment (12/17/92)
Rule 4701 Internal Combustion Engines – Phase I (8/21/03)
Rule 4702 Internal Combustion Engines (11/14/13)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The project is located at 25820 Stockdale Hwy in Bakersfield, California. Pursuant to California Health and Safety Code 42301.6, since this project is not within 1000 feet of a K -12 school, a school notice is not required. A location map is included in **Attachment I**.

IV. Process Description

The IC engines located at this facility power water pumps which are used for the growing of crops and/or animals.

V. Equipment Listing

ATC Equipment Description:

S-5898-11-0: 380 HP CUMMINS MODEL KTA 19GC NATURAL GAS FIRED IC ENGINE WITH ALTRONICS CONTROLS AND CATALYST

VI. Emission Control Technology Evaluation

All five criteria pollutants (NO_x, SO_x, PM₁₀, CO, and VOC) are emitted by the IC engine.

The engine is equipped with a CIC Altronic System consisting of the following components:

- Altronic Model EPC50 air/fuel ratio controller,

- o EmeraChem EC-1200-04-S-CS 3-way catalyst system,
- o Zirconia exhaust gas oxygen sensor,
- o two Type K thermocouples.

Non-Selective Catalytic Reduction (NSCR) decreases NO_x, CO and VOC emissions by using a catalyst to promote the chemical reduction of NO_x into N₂ and O₂, and the chemical oxidation of VOC and CO into H₂O and CO₂. The manufacturer has listed typical conversion efficiencies of 90% -99% for NO_x and CO.

The fuel/air ratio controller, (oxygen controller) is used in conjunction with the NSCR to maintain the amount of oxygen in the exhaust stream to optimize catalyst function.

VII. General Calculations

A. Assumptions

- Daily operating schedule: 24 hours/day
- Annual operating schedule: 5000 hours/year
- EPA F-factor (adjusted to 60°F): 8,578 dscf/MMBtu (40 CFR 60 Appendix B)
- Fuel heating value: 1,000 Btu/scf (District Policy APR 1720)
- Sulfur concentration: 2.85 lb/MMscf (District Policy APR 1720)
- BHP to Btu/hr conversion: 2,542.5 Btu/hp-hr
- Thermal efficiency of engine: commonly ≈ 30%

B. Emission Factors

Emission Factors		
Pollutant	g/hp-hr*	Source
NO _x	1.255	Altronic Interim Certification
SO _x	0.011	Mass Balance Equation Below
PM ₁₀ **	0.075	AP-42 (7/00) Table 3.2-3
CO	16.981	Altronic Interim Certification
VOC	0.243	50 ppmv @ 15% O ₂ , BACT Requirement

*g/hp-hr equivalent of lb/MMBtu values is calculated as follows: (example for SO_x)

$$* \frac{0.00285 \text{ lb}}{\text{MMBtu}} \times \frac{0.002542 \text{ MMBtu}}{\text{hp-hr}_{in}} \times \frac{1 \text{ hp}_{in}}{0.30 \text{ hp}_{out}} \times \frac{453.6 \text{ g}}{1 \text{ lb}} = 0.011 \text{ g/hp-hr}$$

**PM₁₀ value includes both filterable (9.50x10⁻³ lb/MMBtu) and condensable (9.91x10⁻³ lb/MMBtu) emissions.

$$\frac{0.01941 \text{ lb}}{\text{MMBtu}} \times \frac{0.0025425 \text{ MMBtu}}{\text{hp-hr}_{in}} \times \frac{1 \text{ hp}_{in}}{0.30 \text{ hp}_{out}} \times \frac{453.6 \text{ g}}{1 \text{ lb}} = 0.0746 \text{ g/hp-hr}$$

C. Calculations

1. Pre-Project Potential to Emit (PE1)

This is a new engine therefore PE1 = 0 for all pollutants.

2. Post-Project Potential to Emit (PE2)

Daily Pre-Project Emissions					
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Conversion (g/lb)	PE1 Total (lb/day)
NO _x	1.255	380	24	453.6	25.2
SO _x	0.011	380	24	453.6	0.2
PM ₁₀	0.075	380	24	453.6	1.5
CO	16.981	380	24	453.6	341.4
VOC	0.243	380	24	453.6	4.9

Annual Pre-Project Emissions					
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Annual Hours of Operation (hrs/yr)	Conversion (g/lb)	PE1 Total (lb/yr)
NO _x	1.255	380	5000	453.6	5257
SO _x	0.011	380	5000	453.6	46
PM ₁₀	0.075	380	5000	453.6	314
CO	16.981	380	5000	453.6	71129
VOC	0.243	380	5000	453.6	1018

Emissions Profiles are included as **Attachment II**.

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 an existing facility, SSPE1 is equal to the PE1_{Total Pre-Project} from all units for all criteria pollutants.

SSPE1					
Permit Unit	NO _x (lb/yr)	SO _x (lb/yr)	PM ₁₀ (lb/yr)	CO (lb/yr)	VOC (lb/yr)
SSPE Calculator (PTOs only)	4,355	45	37,342	33,634	96,377
S-5898-12-0	3,598	4	44	265	238
SSPE1	7,953	49	37,386	33,899	96,615

*SSPE calculator, no outstanding ATCs

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

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

Since this is a modification to an existing facility, SSPE2 is equal to the PE_{2Total Post-Project} from all units for all criteria pollutants.

For this project the change in emissions for the facility is due to the installation of these engines. Thus:

SSPE2					
Permit Unit	NO _x (lb/yr)	SO _x (lb/yr)	PM ₁₀ (lb/yr)	CO (lb/yr)	VOC (lb/yr)
SSPE1 Total	7,953	49	37,386	33,899	96,615
ATC S-5898-11-0	5,257	46	314	71,129	1,018
SSPE2 Total	13,210	95	37,700	105,028	97,633

5. Major Source Determination

Pursuant to Section 3.25 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 3.25.2 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.

Since emissions at a dairy are not actually collected, a determination of whether emissions could be reasonably collected must be made by the permitting authority. The California Air Pollution Control Association (CAPCOA) prepared guidance in 2005 for estimating potential to emit of Volatile Organic Compounds from dairy farms. The guidance states that *"VOC emissions from the milking centers, cow housing areas, corrals, common manure storage areas, and land application of manure are not physically contained and could not reasonably pass through a stack, chimney, vent, or other functionally-equivalent opening. No collection technologies currently exist for VOC emissions from these emissions units. Therefore, the VOC emissions from these sources are considered fugitive."* The guidance also concludes that, because VOC collection technologies do exist for liquid waste systems at dairies, *"... the VOC emissions from waste lagoons and storage ponds are considered non-fugitive."* The District has researched this issue and concurs with the CAPCOA assessment, as discussed in more detail below.

Milking Center: The mechanical system for the milking parlors can be utilized to capture the gases emitted from the milking parlors; however in order to capture all of the gases, and to keep an appropriate negative pressure throughout the system, the holding area would also need to be entirely enclosed. No facility currently encloses the holding area since cows are continuously going in and out of the barn throughout the day. The capital required to enclose this large area would also be significant. Since the holding area is primarily kept open, the District cannot reasonably demonstrate that emissions can pass through a stack, chimney, vent, or other functionally equivalent opening.

Cow Housing: Although there are smaller dairy farms that have partially enclosed freestall barns, these barns are not fully enclosed and none of the barns have been found to vent the exhaust through a collection device. The airflow requirements through dairy barns are extremely high, primarily for herd health purposes. The airflow requirements will be even higher in the San Joaquin valley, where temperatures reach in excess of 110 degrees in the hot summer. Collection and control of the exhaust including the large amounts of airflow have not yet been achieved by any facility. Due to this difficulty, the District cannot reasonably demonstrate that emissions can pass through a stack, chimney, vent, or other functionally equivalent opening.

It must also be noted that EPA has determined that emissions from open-air cattle feedlots are fugitive in nature.¹ In the District's judgment, this determination for emissions from open feedlots necessitates a similar determination for the open-sided freestalls (usually with open access to corrals or pens and free movement of cattle in and out of the covered area) typical of the San Joaquin Valley since the typical open freestall barn in the San Joaquin Valley bears a far greater resemblance

¹ Letter from William Wehrum, EPA Acting Administrator, to Terry Stokes, Chief Executive Officer – National Cattlemen's Beef Association (November 2, 2006)

(<http://www.epa.gov/Region7/programs/artd/air/nsr/nsrmemos/cowdust.pdf>)

to an extensive shade structure located in a large open lot than an actual enclosed building. Therefore, emissions from open freestall barns are most appropriately treated as fugitive.

Manure Storage Areas: Many dairies have been found to cover dry manure piles. Covering dry manure piles is also a mitigation measure included in District Rule 4570. However, the District was not able to find any facility, which currently captures the emissions from the storage or handling of manure piles. Although some of these piles are covered, the emissions cannot reasonably be captured. Therefore, the District cannot reasonably demonstrate that these emissions can pass through a stack, chimney, vent, or other functionally equivalent opening. In addition, emissions from manure piles have been shown to be insignificant in recent studies.

Land Application: Emissions generated from the application of manure on land cannot reasonably be captured due to the extremely large areas, in some cases thousands of acres, of cropland at dairies. Therefore, the District cannot reasonably demonstrate that these emissions can pass through a stack, chimney, vent, or other functionally equivalent opening.

Feed Handling and Storage: The majority of dairies store the silage piles underneath a tarp or in an Ag-bag. The entire pile is covered except for the face of the pile. The face of the pile is kept open due to the continual need to extract the silage for feed purposes. The silage pile is disturbed 2-3 times per day. Because of the ongoing disturbance to these piles, it makes it extremely difficult to design a system to capture the emissions from these piles. In fact, as far as the District is aware, no system has been designed to successfully extract the gases from the face of the pile to capture them, and, as important, no study has assessed the potential impacts on silage quality of a continuous air flow across the silage pile, as would be required by such a collection system. Therefore, the District cannot demonstrate that these emissions can be reasonably expected to pass through a stack, chimney, vent, or other functionally equivalent opening.

As discussed above, the VOC emissions from the milking center, cows housing, manure storage areas, land application of manure and feed handling and storage are considered fugitive. The District has determined that control technology to capture emissions from lagoons (biogas collection systems, for instance) is in use; therefore, these emissions can be reasonably collected and are not fugitive. Therefore, only emissions from the non-fugitive sources, such as lagoons, storage ponds, IC engines, and gasoline tanks, will be used to determine if dairies are major sources.

The emissions are calculated as follows:

The emissions are calculated as follows:

Lagoon Emissions (Flushed Freestalls & Flushed Corrals)			
Daily Potential to Emit			
Type of Cow	Number of Cows	lb-VOC/hd-yr	lbs-VOC/yr
Milking Cow	2,436	x 1.17	2850
Dry Cow	405	x 0.64	259
Support Stock	2045	x 0.49	1002
Total			4,111

Major Source Determination (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
S-5898-1-4 through -4-4 and -8-1	0	0	0	0	4,111
S-5898-6-0	551	9	28	168	63
S-5898-10-1	3,804	36	227	33,466	737
S-5898-12-0	3,598	4	44	265	238
Total Pre-Project	7,953	49	299	33,899	5,149
S-5898-11-0	5,257	46	314	71,129	1,018
Total Post-Project	13,210	95	613	105,028	6,167
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No

As seen in the table above, 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)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO₂	VOC	SO₂	CO	PM	PM₁₀
Estimated Facility PE before Project Increase	4	0.02	0.02	16.9	0.15	0.15
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	N	N	N	N	N	N

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

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

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

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

As shown in Section VII.C.5 above, the facility is not a Major Source for any pollutant.

Since this is a new emissions unit BE = 0.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is not a major source for any of the pollutants addressed in this project, this project does not constitute an SB 288 major modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

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

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

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

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from New and Modified Units	2.6	0.5	0.02	17.8	0.16	0.16
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

10. 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. The permit unit is new and therefore QNEC is PE2/4 for all air contaminants.

VIII. Compliance

Rule 1070 Inspections

This rule applies to any source operation, which emits or may emit air contaminants.

This rule allows the District to perform inspections for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations. The rule also allows the District to require record keeping, to make inspections and to conduct tests of air pollution sources. Therefore, the following conditions will be listed on the ATCs to ensure compliance:

- {3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]
- {3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]

Rule 2010 Permits Required

The provisions of this rule apply to any person who plans to or does operate, construct, alter, or replace any source operation, which may emit air contaminants or may reduce the emission of air contaminants.

Pursuant to Section 4.0, a written permit shall be obtained from the APCO. No Permit to Operate shall be granted either by the APCO or the Hearing Board for any source operation described in Section 3.0 constructed or installed without authorization as required by Section 3.0 until the information required is presented to the APCO and such source operation is altered, if

necessary, and made to conform to the standards set forth in Rule 2070 (Standards for Granting Applications) and elsewhere in these rules and regulations.

Rule 2020 Exemptions

Per Section 6.20, agricultural sources are exempt from District permit requirements to the extent provided by CH&SC, section 42301.16. However this facility does not qualify for permit exemption since the NO_x and/or VOC emissions are greater than 10,000 lb/year (equivalent to ½ the Major Source Threshold).

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

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

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB288 Major Modification or a Federal Major Modification, as defined by the rule.

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

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

As discussed previously in Section I, for this project there is an installation of a new emissions unit with a PE > 2 lb/day for any criteria pollutant; therefore BACT is triggered for NO_x and VOC for a new emissions unit with a PE > 2 lb/day. The PE is greater than 2 lb/day for CO from this engine, however SSPE2 is less than 200,000 lb/yr so BACT is not triggered for CO for this engine.

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

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

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

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

d. SB 288/Federal Major Modification

As discussed in Section VII.C.7 above, this project does not constitute a SB 288 and/or Federal Major Modification for NO_x emissions; therefore BACT is not triggered for any pollutant.

2. BACT Guideline

Draft BACT Guideline X.X.X, applies to AO Stationary Spark Ignited IC engines (≤ 1,000 hp) serving Irrigation Pumps. (See **Attachment III**)

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, 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.

BACT has been satisfied with the following (see **Attachment IV**):

NO_x: NO_x emissions of 90 ppmvd @ 15% O₂ or less
VOC: VOC emissions of 50 ppmvd @ 15% O₂ or less

B. Offsets

1. Offset Applicability

Per Section 4.6.9, offsets are not required for agricultural operations.

C. Public Notification

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.
- e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

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

As demonstrated in Sections VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

The PE2 for this new unit is compared to the daily PE Public Notice thresholds in the following table:

PE > 100 lb/day Public Notice Thresholds			
Pollutant	PE2 (lb/day)	Public Notice Threshold	Public Notice Triggered?
NO _x	25.2	100 lb/day	No
SO _x	0.2	100 lb/day	No
PM ₁₀	1.5	100 lb/day	No
CO	341.4	100 lb/day	Yes
VOC	4.9	100 lb/day	No

Therefore, public noticing for PE > 100 lb/day purposes is required.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	7,953	13,210	20,000 lb/year	No
SO _x	49	95	54,750 lb/year	No
PM ₁₀	37,386	37,700	29,200 lb/year	No
CO	33,899	105,028	200,000 lb/year	No
VOC	96,615	97,633	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	7,953	13,210	5,257	20,000 lb/year	No
SO _x	49	95	46	20,000 lb/year	No
PM ₁₀	37,386	37,700	314	20,000 lb/year	No
CO	33,899	105,028	71,129	20,000 lb/year	Yes
VOC	96,615	97,633	1,018	20,000 lb/year	No

As demonstrated above, the SSIPE for CO was greater than 20,000 lb/year; therefore public noticing for SSIPE purposes is required.

e. Title V Significant Permit Modification

Since this facility does not have a Title V operating permit, this change is not a Title V significant Modification, and therefore public noticing is not required.

2. Public Notice Action

As discussed above, public noticing is required for this project for CO emissions in excess of 100 lb/day and 20,000 lb/yr. Therefore, public notice documents will be

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

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

For this IC engine, the DELs are stated in the form of emission factors (g/hp-hr or lb/MMBtu), the maximum engine horsepower rating, and the maximum operational time of 24 hours per day.

Proposed Rule 2201 (DEL) Conditions:

{4872} NOx emissions from this IC engine shall not exceed 90 ppmvd-NOx @ 15% O2 (equivalent to 1.3 g-NOx/bhp-hr). [District Rules 2201 and 4702] N

PM10 emissions from this IC engine shall not exceed 0.075 g-PM10/bhp-hr. [District Rule 2201] N

Emissions from this IC engine shall not exceed any of the following limits: 2000 ppmvd CO @ 15% O2 (equivalent to 16.981 g-CO/bhp-hr) or 50 ppmvd-VOC @ 15% O2 (equivalent to 0.243 g-VOC/bhp-hr). [District Rules 2201 and 4702] N

E. Compliance Assurance

1. Source Testing

Source testing is not required under Rule 4702 (see below).

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201. However, monitoring is required per Rule 4702 (Internal Combustion Engines - Phase 2), see the 4702 discussion below.

3. Recordkeeping

The following conditions will appear on the permit:

- The permittee shall record the total time the engine operates, in hours per calendar year. [District Rule 2201]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

An AAQA shall 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 District's Technical Services Division conducted the required analysis. Refer to **Attachment V** of this document for the AAQA summary sheet.

The proposed location is in an attainment area for NO_x, CO, and SO_x. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for NO_x, CO, or SO_x.

The proposed location is in a non-attainment area for the state's PM₁₀ as well as federal and state PM_{2.5} thresholds. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for PM₁₀ and PM_{2.5}.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. The following subpart of 40 CFR Part 60 applies to reciprocating natural gas-fired IC engines.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The District has authority to implement this subpart via the Title V program for Major Sources. However, the District does not have jurisdiction on implementing this subpart for minor sources since EPA has not delegated that part of the subpart to date.

Side note, although the District is not implementing the subpart for minor sources since it remains EPA responsibility, subject facilities are still required to meet the subpart.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

The requirements of 40 CFR Part 63, Subpart ZZZZ (*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*) covers stationary engines at agricultural and non-agricultural facilities.

The District has not been delegated the authority to implement NESHAP regulations for Area Source requirements for non-Major Sources; therefore, no requirements shall be included on the permit.

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.

Pursuant to Section 4.12, emissions subject to or specifically exempt from Regulation VIII (Fugitive PM10 Prohibitions) are considered to be exempt. Since IC engines are not subject to or specifically exempt from Regulation VIII, the provisions of Rule 4101 apply to IC engines. Therefore, the following condition will be placed on the ATCs.

- {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in anyone hour which is dark or darker than Ringelmann 1 or equivalent to 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. Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected. 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* 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.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Attachment III**), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
S-5898-11	1.55E-06	Yes

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is required for this project because the HRA indicates that the risk is above the District's thresholds for triggering T-BACT requirements.

For this project T-BACT is triggered for VOC. T-BACT is satisfied with BACT for VOC (see **Attachment III**), which is the use of catalyst for VOC control; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 20 in a million). As outlined by the HRA Summary in **Attachment III** of this report, the emissions increases for this project was determined to be less than significant.

The following special conditions are listed on the engine permit to ensure compliance.

- {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]
- Operation of this engine shall not exceed 5000 hrs per calendar year.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

$$0.075 \frac{g}{hp \cdot hr} \times \frac{1 hp \cdot hr}{2,542.5 Btu} \times \frac{10^6 Btu}{8,578 dscf} \times \frac{0.30 Btu_{out}}{1 Btu_{in}} \times \frac{15.43 grain}{g} = 0.016 \frac{grain}{dscf}$$

Since 0.016 grain/dscf is not greater than 0.1 grain/dscf, compliance with this rule is expected.

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

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

Rule 4701 Internal Combustion Engines - Phase 1

The provisions of this rule do not apply to engines in agricultural operations in the growing of crops or raising of fowl or animals. Therefore, the following condition will be included on the permit(s):

This IC engine shall only be used for the growing of crops or raising of fowl or animals.
[District Rule 4701]

Rule 4702 Stationary Internal Combustion Engines

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

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

Section 5.2.3 requires the owner of a spark-ignited internal combustion engine shall not operate it in such a manner that results in emissions exceeding the limits in Table 1 below for the appropriate engine type according to the compliance schedules listed in Section 7.0 or according to the compliance dates specified in Table 1 below. A spark-ignited engine shall comply with the applicable emission limits pursuant to Section 5.1 or Section 8.0.

Table 1 Emission Limits/Standards for a Spark-Ignited Internal Combustion Engine and Emission Limits/Standards and Compliance Schedule for a Spark-Ignited Engine Used Exclusively in Agricultural Operations (corrected to 15% oxygen on a dry basis)

District Rule 4702 Emission Limits			
Engine Type	NO _x	CO	VOC
3. Rich-Burn Engine Used Exclusively in Agricultural Operations			
a. Comply by 1/1/2009, or if owner has an agreement to electrify, comply by 1/1/2010	90 ppmv or 80% reduction	2000 ppmv	250 ppmv

The facility has proposed to equip their existing natural gas engine in this project with an interim certified Altronic Inc. EPC-50 AFRC emission control system that meets the applicable NO_x, CO and VOC limits for rich-burn engines used in exclusively agricultural operations. To ensure compliance with Section 5.1 of District Rule 4702, the following conditions will be placed on the permits:

- The Altronic Inc. EPC-50 AFRC System shall consist of an Altronic EPC50 air/fuel ratio controller, an EmeraChem EC-1200-04-S-CS three-way catalyst system, two Type K thermocouples, and Zirconia exhaust gas oxygen sensor. [District Rule 4702]*
- The Altronic Inc. EPC-50 AFRC System shall be installed, maintained and operated according to the component manufacturer's recommendations and shall be in place and*

operating at all times during engine operation. [District Rule 4702]

- *A person performing installation of or maintenance specific to the Altronic Inc. EPC-50 AFRC System shall be a certified employee of Coastal Ignition & Controls or Water Associates, or work under the direct and personal supervision of an individual physically present at the work site who is certified. [District Rule 4702]*
- *This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO-approved alternative. [District Rule 4702]*
- *This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer, Coastal Ignition & Controls (CIC), or Water Associates. [District Rule 4702]*
- *During periods of operation, 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]*
- *This IC engine shall be fired on Public Utility Commission (PUC) regulated natural gas only. [District Rules 4702 and 4801]*
- *The oxygen sensor shall be replaced every 2,000 hours of operation or when the EPC-50 controller indicates that an alarm code has been triggered for the sensor, whichever occurs earliest. Whenever the oxygen sensor is replaced, the Altronic Inc. EPC-50 AFRC System shall be calibrated, prior to resuming normal engine operation, according to the procedures outlined by equipment manufacturer. [District Rule 4702]*
- *The catalyst module housing and elements shall be visually inspected at least once every calendar quarter. The catalyst shall be washed at least once every 8,640 hours of operation and replaced at least every 25,920 hours of operation. [District Rule 4702]*
- *The thermocouples shall be replaced according to the manufacturer recommendations but at least every 36,000 hours of engine operation or every 48 calendar months, whichever comes first. Whenever the thermocouples are replaced, the Altronic Inc. EPC-50 AFRC System shall be calibrated, prior to resuming normal engine operation, according to the procedures outlined by Coastal Ignition & Controls. [District Rule 4702]*
- *The pre- and post-catalyst exhaust temperatures shall be monitored and the temperature increase over the catalyst shall be recorded at initial system calibration. Both temperatures shall be monitored at least once in each calendar month that the engine operates. If the temperature increase over the catalyst becomes less than 50% of the initially determined value, the Altronic Inc. EPC-50 AFRC System shall be calibrated or repaired, as necessary. [District Rule 4702]*
- *After the Altronic Inc. EPC-50 AFRC System is calibrated or repaired in response to a catalyst temperature drop, a District-approved portable analyzer shall be used to determine that the NO_x and CO emissions and O₂ levels are at or below permitted levels. The pre- and post-catalyst exhaust temperatures shall be monitored and the temperature increase over the catalyst shall be recorded at that time and the temperature increase over the catalyst shall be re-established. Monthly monitoring of the pre- and post-catalyst exhaust temperature shall resume as required in the previous condition, based on the new temperature increase value. [District Rule 4702]*
- *Within 30 days after installation of the Altronic Inc. EPC-50 AFRC System, a District-*

approved portable analyzer shall be used to determine NOx and CO emissions, and O2 levels. All emission readings shall be taken with the unit operating at conditions representative of normal operations. The analyzer shall be calibrated, maintained, operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702]

- *Until this system receives Final Certification from the District, the NOx, CO, and O2 monitoring provisions specified above condition shall be conducted at least once every 12 months. Monitoring conducted as part of routine maintenance and repair actions may be used satisfy this requirement, so long as no more than twelve months elapses between monitoring actions. Should the 12 month deadline fall during a period of non-operation, the engine shall be monitoring within 30-calandar days of recommencing operations. [District Rule 4702]*
- *If either the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than eight (8) hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after eight (8) hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702]*
- *During the start-up inspection, the District shall be provided with written documentation that the emission control system is suitable for use on this engine and verify the engine's horsepower rating, exhaust flow rate, exhaust temperature, oil consumption, general mechanical condition and the available fuel supply pressure will satisfy the criteria for proper operation of the Altronic Inc. EPC-50 AFRC System, along with portable analyzer calibration records and results. [District Rule 4702]*
- *{4872} NOx emissions from this IC engine shall not exceed 90 ppmvd-NOx @ 15% O2 (equivalent to 1.3 g-NOx/bhp-hr). [District Rules 2201 and 4702] N*
- *PM10 emissions from this IC engine shall not exceed 0.075 g-PM10/bhp-hr. [District Rule 2201] N*
- *Emissions from this IC engine shall not exceed any of the following limits: 2000 ppmvd CO @ 15% O2 (equivalent to 16.981 g-CO/bhp-hr) or 50 ppmvd-VOC @ 15% O2 (equivalent to 0.243 g-VOC/bhp-hr). [District Rules 2201 and 4702] N The operator shall maintain engine operating log records of: 1) the monthly engine hour meter reading; 2) the date and the engine hour meter reading at each oxygen sensor change, and thermocouples change; 3) the monthly pre- and post-catalyst exhaust temperatures monitoring data including the initial temperature differential and any subsequently determined temperature differentials; 4) the date and engine hour meter reading of each catalyst module inspection, washing, and replacement; and 5) fuel purchase records.*

[District Rule 4702]

- *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]*
- *Should Final Certification of the Altronic Inc. EPC-50 AFRC System not be achieved by June 30th, 2018, this engine shall be considered to be uncertified under Rule 4702 and subject to initial and periodic source testing every 60 months, portable analyzer monitoring every 24 months, and a District-approved monthly Inspection & Monitoring plan. [District Rule 4702]*
- *The District may revise and/or add requirements in the future as necessary to ensure the Altronic Inc. EPC-50 AFRC System operates according to its **Interim** Certification requirements. [District Rule 4702]*

Section 5.3 provides requirements for continuous emissions monitoring systems (CEMS). The engine in this project is not equipped with a CEMS; therefore, this section does not apply.

Sections 5.4 and 5.5 provide requirements for engines that use percent emission reduction to comply with the NO_x emission limits of Section 5.2. The engine in this project does not use percent emission reduction to comply with the emission limits of Section 5.2; therefore, these sections do not apply.

Section 5.6 provides requirements for operators that will pay an annual fee in lieu of complying with a NO_x emission limit. As previously discussed, the engine in this project will comply with the NO_x emission limit in Section 5.2.3 of this rule; therefore, the option to pay an annual fee is not applicable.

Section 5.7 provides sulfur oxide (SO_x) emission control requirements for non-AO spark-ignited engines and non-AO compression-ignited engines. The engine in this project is used exclusively in agricultural operations (AO); therefore, the SO_x emission control requirements of this section do not apply.

Section 5.8 provides monitoring requirements for non-AO spark-ignited engines and engines in an AECP (Section 8.0). The engine in this project is used exclusively in agricultural operations (AO) and is not in an Alternate Emissions Control Plan (AECP); therefore, the monitoring requirements of this section do not apply.

Section 5.9 states that the owner of an AO spark-ignited or compression-ignited engine subject to the requirements of Section 5.2 shall:

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

operate the time meter or alternative device in accordance with the manufacturer's instructions.

Conditions that ensure compliance with the requirements of Section 5.9 were previously mentioned in Section 5.2.3. Therefore, compliance is expected and no further discussion is necessary.

Section 5.9.5 requires the owner of an agricultural spark-ignited engine that has been retrofitted with an exhaust control system that has not been certified in accordance with Section 9.0 to conduct periodic monitoring of the engine's NOx emissions using a District-approved portable emissions analyzer.

- Use a portable NOx analyzer to take NOx emission readings at least once every 24 months that the engine is operated.
- All emission readings shall be taken with the engine operating either at conditions representative of normal operations or conditions specified in the Permit-to-Operate or Permit-Exempt Equipment Registration.
- The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO.
- All NOx emissions readings shall be reported to the APCO in a manner approved by the APCO.
- NOx emission readings taken pursuant to this section shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15 consecutive-minute period.

The applicant has proposed to install an interim certified control system. Conditions that ensure compliance with the requirements of Section 5.9.5 were previously mentioned in Section 5.2.3. Therefore, compliance is expected and no further discussion is necessary.

Section 6.1 requires that the owner of an engine subject to the requirements of this rule shall submit to the APCO an emission control plan of all actions to be taken to satisfy the emission requirements of Section 5.1 and the compliance schedules of Section 7.0.

Section 6.1.3 requires that the emission control plan shall identify the type of emission control device or technique to be applied to each engine and a construction/removal schedule, or shall provide support documentation sufficient to demonstrate that the engine is in compliance with the emission requirements of this rule.

The applicant has submitted all the required information for Section 6.1 and 6.1.3 in the application for the IC engine involved with this project.

Section 6.2 requires that the owner of an engine subject to the requirements of Section 5.2 shall maintain an engine operating log to demonstrate compliance with this rule. This information shall be retained for a period of at least five years, shall be readily available, and

be made available to the APCO upon request. The engine-operating log shall include, on a monthly basis, the following information:

- Total hours of operation,
- Type of fuel used,
- Maintenance or modifications performed,
- Monitoring data,
- Compliance source test results, and
- Any other information necessary to demonstrate compliance with this rule.

Section 6.2.2 requires that the data collected pursuant to the requirements of Section 5.6 shall be maintained for at least five years, shall be readily available, and made available to the APCO upon request.

Conditions that ensure compliance with the requirements of Section 6.2 and 6.2.2 were previously mentioned in Section 5.2.3. Therefore, compliance is expected and no further discussion is necessary.

Section 6.3 provides source testing requirements for an owner of an engine subject to Section 5.2 or Section 8.0. Pursuant to section 6.3.1, the following engines shall comply with the requirements of Sections 6.3.2 through 6.3.4.

- 6.3.1.1 Engines that have been retrofitted with an exhaust control device, except those certified per Section 9.0;
- 6.3.1.2 Engines subject to Section 8.0;
- 6.3.1.3 An AO spark-ignited engine that is subject to the requirements of Section 8.0;
- 6.3.1.4 An AO spark-ignited engine that has been retrofitted with a catalytic emission control and is not subject to the requirements of Section 8.0.

The applicant has proposed to install an interim certified exhaust control device and will be required to perform a portable analyzer test upon startup of the engine; no source testing is required. Therefore, the requirements of Section 6.3 are not applicable.

Section 6.4 outlines the test procedures for determining compliance with the requirements of Section 5.2. The engine in this project is subject to the requirements of Section 5.2; however, the engine is not subject to source testing, as previously discussed, since the exhaust control system received interim certification. Therefore the requirements of this section are not applicable.

Section 6.5 requires that the owner of an engine subject to the emission limits in Section 5.2 or the requirements of Section 8.0 shall submit to the APCO for approval, an Inspection and Monitoring (I&M) plan that specifies all actions to be taken to satisfy the following requirements and the requirements of Section 5.8. Pursuant to section 6.5.1, the following engines shall comply with the requirements of Sections 6.5.2 through 6.5.9.

- 6.5.1.1 Engines that have been retrofitted with an exhaust control device, except those certified per Section 9.0;

- 6.5.1.2 Engines subject to Section 8.0;
- 6.5.1.3 An AO spark-ignited engine that is subject to the requirements of Section 8.0;
- 6.5.1.4 An AO spark-ignited engine that has been retrofitted with a catalytic emission control and is not subject to the requirements of Section 8.0.

The applicant has proposed to install an interim certified exhaust control device and is not subject to Section 8.0. Therefore, the requirements of Section 6.5 are not applicable.

Section 7.3 outlines the compliance schedule for AO compression-ignited engines. The engine in this project is a spark-ignited engine; therefore, the requirements of this section are not applicable.

Section 8.0 outlines the requirements for an Alternative Emission Control Plan (AECPP). As previously discussed, the engine in this project is not subject to submitting an AECPP; therefore, the requirements of this section are not applicable.

Rule 4801 Sulfur Compounds

The purpose of this rule is to limit the emissions of sulfur compounds to 0.2% by volume (2,000 ppmv) calculated as sulfur dioxide (SO₂), on a dry basis averaged over 15 consecutive minutes.

Given:

- Emission factor for SO_x for PUC gas = 0.00285 lb-SO_x/MMBtu
- Volume SO₂ = nRT/P
- n = moles SO₂
- T (standard temperature) = 60 °F or 520 °R
- R (universal gas constant) = $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$

$$\frac{0.00285 \text{ lb} \cdot \text{SO}_x}{\text{MMBtu}} \times \frac{1 \text{ MMBtu}}{8,578 \text{ dscf}} \times \frac{1 \text{ lb} \cdot \text{mole}}{64 \text{ lb}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mole} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times \frac{1,000,000 \text{ parts}}{\text{million}} = 1.97 \frac{\text{parts}}{\text{million}}$$

Since 1.97 ppmv is ≤ 2000 ppmv, this engine is expected to comply with Rule 4801. The following condition will be included on the ATC.

- *This IC engine shall be fired on Public Utility Commission (PUC) quality natural gas only. [District Rules 2201 and 4801]*

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.

California Environmental Quality Act (CEQA)

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 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; and/
- 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.

It is determined that no other agency has prepared or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

On December 17, 2009, the District's Governing Board adopted a policy, APR 2005, *Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*, for addressing GHG emission impacts when the District is Lead Agency under CEQA and approved the District's guidance document for use by other agencies when addressing GHG impacts as lead agencies under CEQA. Under this policy, the District's determination of significance of project-specific GHG emissions is founded on the principal that projects with GHG emission reductions consistent with AB 32 emission reduction targets are considered to have a less than significant impact on global climate change. Consistent with District Policy 2005, projects complying with an approved GHG emission reduction plan or GHG mitigation program, which avoids or substantially reduces GHG emissions within the geographic area in which the project is located, would be determined to have a less than significant individual and cumulative impact for GHG emission.

The California Air Resources Board (ARB) adopted a Cap-and-Trade regulation as part one of the strategies identified for AB 32. This Cap-and-Trade regulation is a statewide plan, supported by a CEQA compliant environmental review document, aimed at reducing or mitigating GHG emissions from targeted industries. Facilities subject to the Cap-and-Trade regulation are subject to an industry-wide cap on overall GHG emissions. Any growth in emissions must be accounted for under that cap such that a corresponding and equivalent reduction in emissions must occur to allow any increase. Further, the cap decreases over time, resulting in an overall decrease in GHG emissions.

Under District policy APR 2025, *CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation*, the District finds that the Cap-and-Trade is a

regulation plan approved by ARB, consistent with AB32 emission reduction targets, and supported by a CEQA compliant environmental review document. As such, consistent with District Policy 2005, projects complying project complying with Cap-and-Trade requirements are determined to have a less than significant individual and cumulative impact for GHG emissions.

The GHG emissions increases associated with this project result from the combustion of fossil fuel(s), other than jet fuel, delivered from suppliers subject to the Cap-and-Trade regulation. Therefore, as discussed above, consistent with District Policies APR 2005 and APR 2025, the District concludes that the GHG emissions increases associated with this project would have a less than significant individual and cumulative impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs S-5898-11-0 subject to the permit conditions on the attached draft ATC in **Attachment VI**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
ATC S-5898-11	3020-10-C	380 bhp IC Engine	\$252

Attachments

- I: Location Map
- II: Emissions Profiles
- III: BACT Guideline
- IV: BACT Analysis
- V HRA/AAQA Modelling
- VI: Draft ATC

ATTACHMENT I
Location Map

Bidart Farms

S-5898

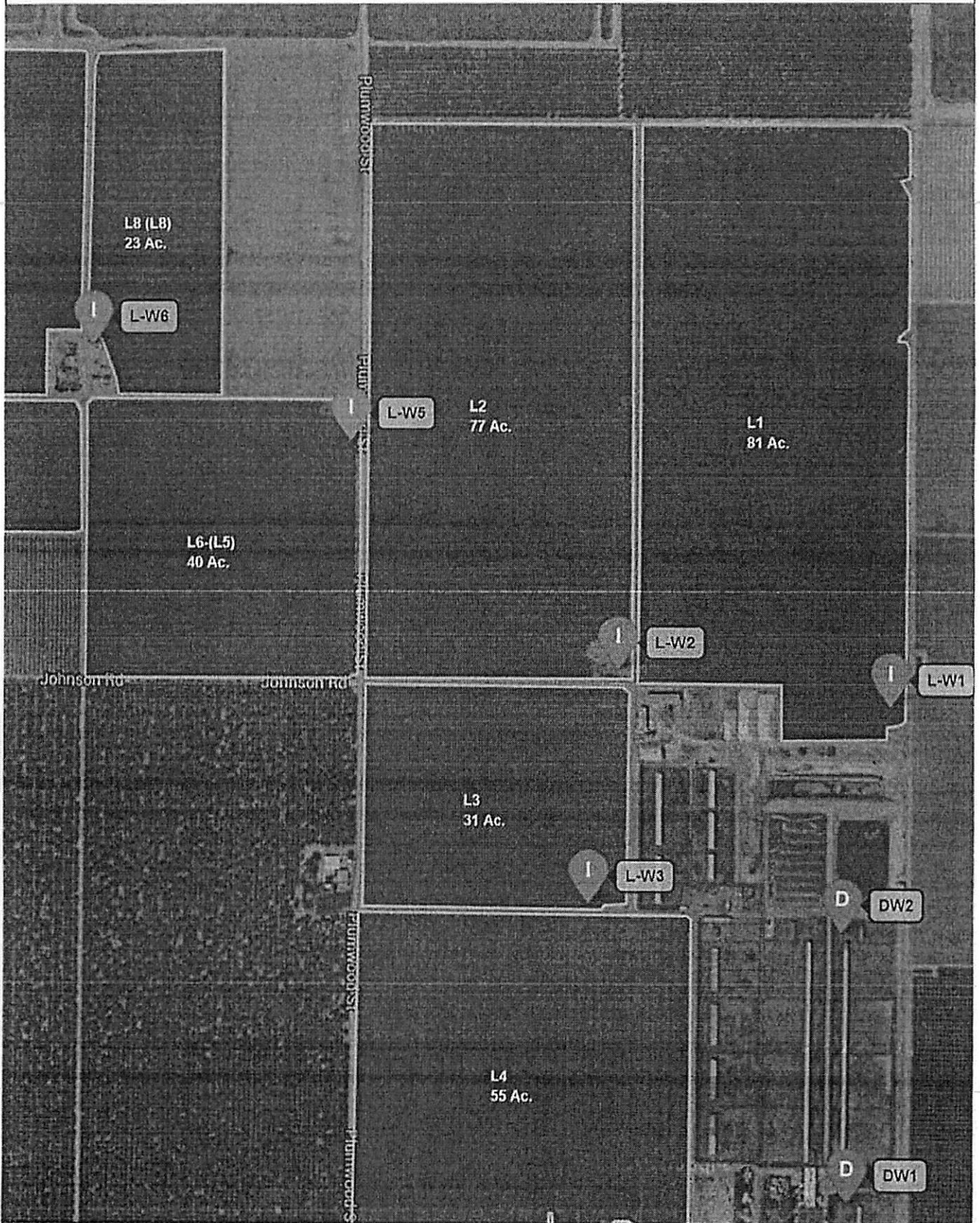


Legend:

- Irrigation Well
- Triticale

L-W2 = N-2,550FT
S-2,736FT
E-1,401FT
W-2,541FT





Legend:

- Irrigation Well
- Pump Station
- Domestic Well
- Triticale



ATTACHMENT II
Emissions Profile

Permit #: S-5898-11-0	Last Updated
Facility: BIDART DAIRY III, LLC	06/16/2016 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	5257.0	46.0	314.0	71129.0	1018.0
Daily Emis. Limit (lb/Day)	25.2	0.2	0.5	341.4	4.9
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	1314.0	11.0	78.0	17782.0	254.0
Q2:	1314.0	11.0	78.0	17782.0	254.0
Q3:	1314.0	12.0	79.0	17782.0	255.0
Q4:	1315.0	12.0	79.0	17783.0	255.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

ATTACHMENT III BACT Guideline

Best Available Control Technology (BACT) Guideline

Emission Unit: AO Stationary Spark-Ignited IC
Engines serving Irrigation Pumps

Industry Type: Agriculture

Equipment Rating: ≤ 1,000 bhp

Last Update: September 26, 2011

Pollutant	Achieved In Practice	Technologically Feasible	Alternate Basic Equipment
VOC	50 ppmvd @ 15% O ₂ *		Electrification
NO _x	90 ppmvd @ 15% O ₂ *	5 ppmvd @ 15% O ₂ (Lean Burn Engines only)	
CO	500 ppmvd @ 15% O ₂ *		
PM ₁₀	0.063 g/bhp-hr		
SO _x	0.0094 g/bhp-hr		

*Achievable via Rich-Burn Engine w/3-way catalyst or Lean Burn Engine.

ATTACHMENT IV BACT Analysis

BACT Analysis for NOx

I. Step 1 - Identify All Possible Control Technologies

Option 1: 90 ppmv @ 15% O₂

Option 2: Electrification (ABE)

Option 3: Lean Burn Engine with 5 ppmv @ 15% O₂

II. Step 2 - Eliminate Technologically Infeasible Options

Since electrical power is not located at the water well, electrification is not technologically feasible.

Pursuant to the BACT Guideline above, the option of a 5 ppm lean burn engine is only technologically feasible if the applicant has proposed a lean burn engine. Since the applicant has proposed a rich burn engine, this option is not technologically feasible and shall be eliminated.

III. Step 3 - Rank Technologies

Control Technology	Rank	Emissions	Technology Classification for BACT
Catalyst	1	90 ppmv	AIP

IV. Step 4 - Cost Effectiveness Analyses

Since the only remaining control technology has been proposed, a cost effectiveness analysis is not required.

V. Step 5 - Select BACT

The applicant has selected the most effective feasible NOx control. Therefore BACT is satisfied with 90 ppmv NOx.

BACT Analysis for VOC Emissions

Step 1 - Identify All Possible Control Technologies

- Option 1: 50 ppm VOC @ 15% O₂ (AIP)
- Option 2: Electrification (ABE)

II. Step 2 - Eliminate Technologically Infeasible Options

Since electrical power is not located at the water well, electrification is not technologically feasible.

III. Step 3 - Rank Technologies

Control Technology	Rank	Emissions	Technology Classification for BACT
Catalyst	1	50 ppmv	AIP

IV. Step 4 - Cost Effectiveness Analyses

Since the only remaining control technology has been proposed, a cost effectiveness analysis is not required.

V. Step 5 - Select BACT

The applicant has selected the most effective feasible VOC control. Therefore BACT is satisfied with 50 ppmv NO_x.

ATTACHMENT V
HRA/AAQA Modelling

REVISED
San Joaquin Valley Air Pollution Control District
Risk Management Review

To: Rob Rinaldi, AQE – Permit Services
 From: Stephanie Pellegrini, AQS – Technical Services
 Date: June 14, 2016
 Facility Name: Bidart Dairy III LLC
 Location: 25820 Stockdale Hwy, Bakersfield
 Application #(s): S-5898-11-0
 Project #: S-1161488

A. RMR SUMMARY

RMR Summary			
Categories	380 hp NG ICE (Unit 11-0)	Project Totals	Facility Totals
Prioritization Score	1.47	1.47	>1.0
Acute Hazard Index	0.03	0.03	0.03
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk	1.55E-06	1.55E-06	1.55E-06
T-BACT Required?	Yes		
Special Permit Requirements?	Yes		

Proposed Permit Requirements

To ensure that human health risks will not exceed District allowable levels; the following shall be included as requirements for:

Unit # 11-0

1. Operation of the engine shall not exceed 5,000 hours per calendar year.
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.

T-BACT is required for this unit because of emissions of PAHs, which are VOCs.

B. RMR REPORT

I. Project Description

Technical Services received a request on June 13, 2016, to revise a Risk Management Review for a proposed installation of a 380 hp natural gas-fired IC engine with Altronics controls and catalyst. The revision requires an Ambient Air Quality Analysis (AAQA).

II. Analysis

Toxic emissions for this proposed unit were calculated using 2000 AP42 emission factors for Natural Gas Fired internal combustion 4 Stroke Rich Burn Engine, and input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, May 28, 2015), risks from the proposed unit's toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines. The prioritization score for the facility is greater than 1.0 (see RMR Summary Table). Therefore, a refined health risk assessment was required. The AERMOD model was used, with the parameters outlined below and meteorological data for 2010-2014 from Bakersfield to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the SHARP Program, which then used the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameters Unit 11-0			
Source Type	Point	Location Type	Rural
Stack Height (m)	3.66	Closest Receptor (m)	457
Stack Diameter (m)	0.13	Type of Receptor	Residence
Stack Exit Velocity (m/s)	71.6	Max Hours per Year	5,000
Stack Exit Temp. (°K)	990	Fuel Type	NG
NG Usage (MMscf/hr)	2.76E-03	NG Usage (MMscf/yr)	13.8

Technical Services performed modeling for criteria pollutants CO, NO_x, SO_x, and PM₁₀ with the emission rates below:

Unit #	NO _x (Lbs.)		SO _x (Lbs.)		CO (Lbs.)		PM ₁₀ (Lbs.)	
	Hr.	Yr.	Hr.	Yr.	Hr.	Yr.	Hr.	Yr.
11-0	1.05	5,257	0.01	46	10.3	51,563	0.06	314

Criteria Pollutant Modeling Results*

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

*Results were taken from the attached PSD spreadsheet.

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

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

III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk associated with the project is greater than 1.0 in a million, but less than 20 in a million. **In accordance with the District's Risk Management Policy, the project is approved with Toxic Best Available Control Technology (T-BACT).**

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

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

IV. Attachments

- A. RMR request from the project engineer
- B. Additional information from the applicant/project engineer
- C. Prioritization score w/ toxic emissions summary
- D. Facility Summary
- E. AAQA Report
- F. AAQA Summary

ATTACHMENT VI
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-5898-11-0

LEGAL OWNER OR OPERATOR: BIDART DAIRY III, LLC
MAILING ADDRESS: 20400 OLD RIVER RD
BAKERSFIELD, CA 93311

LOCATION: 25820 STOCKDALE HWY
BAKERSFIELD, CA 93314

EQUIPMENT DESCRIPTION:
380 HP CUMMINS MODEL KTA 19GC NATURAL GAS FIRED IC ENGINE WITH ALTRONICS CONTROLS AND CATALYST

CONDITIONS

1. {3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]
2. {3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {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]
5. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. {4877} This IC engine shall only be used for the growing and harvesting of crops or the raising of fowl or animals for the primary purpose of making a profit, providing a livelihood, or conducting agricultural research or instruction by an educational institution. [District Rules 4701 and 4702]
7. The Altronic Inc. EPC-50 AFRC System shall consist of an Altronic EPC50 air/fuel ratio controller, an EmeraChem EC-1200-04-S-CS three-way catalyst system, two Type K thermocouples, and Zirconia exhaust gas oxygen sensor. [District Rule 4702]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjollet, Director of Permit Services

6-5898-11-0: Jun 18 2016 8:47AM - EDGEHLR : Joint Inspection Required with EDGEHLR

8. {4879} The Altronic Inc. EPC-50 AFRC System shall be installed, maintained and operated according to the component manufacturer's recommendations and shall be in place and operating at all times during engine operation. [District Rule 4702]
9. {4880} A person performing installation of or maintenance specific to the Altronic Inc. EPC-50 AFRC System shall be a certified employee of Coastal Ignition & Controls or Water Associates, or work under the direct and personal supervision of an individual physically present at the work site who is certified. [District Rule 4702]
10. {3404} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
11. This engine shall not be operated more than 5,000 hours per year. [District Rule 2201]
12. {4893} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer, Coastal Ignition & Controls (CIC), or Water Associates. [District Rule 4702]
13. {4037} During periods of operation, 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]
14. {4863} This IC engine shall be fired on Public Utility Commission (PUC) regulated natural gas only. [District Rules 4702 and 4801]
15. {4881} The oxygen sensor shall be replaced every 2,000 hours of operation or when the EPC-50 controller indicates that an alarm code has been triggered for the sensor, whichever occurs earliest. Whenever the oxygen sensor is replaced, the Altronic Inc. EPC-50 AFRC System shall be calibrated, prior to resuming normal engine operation, according to the procedures outlined by equipment manufacturer. [District Rule 4702]
16. {4882} The catalyst module housing and elements shall be visually inspected at least once every calendar quarter. The catalyst shall be washed at least once every 8,640 hours of operation and replaced at least every 25,920 hours of operation. [District Rule 4702]
17. {4883} The thermocouples shall be replaced according to the manufacturer recommendations but at least every 36,000 hours of engine operation or every 48 calendar months, whichever comes first. Whenever the thermocouples are replaced, the Altronic Inc. EPC-50 AFRC System shall be calibrated, prior to resuming normal engine operation, according to the procedures outlined by Coastal Ignition & Controls. [District Rule 4702]
18. {4884} The pre- and post-catalyst exhaust temperatures shall be monitored and the temperature increase over the catalyst shall be recorded at initial system calibration. Both temperatures shall be monitored at least once in each calendar month that the engine operates. If the temperature increase over the catalyst becomes less than 50% of the initially determined value, the Altronic Inc. EPC-50 AFRC System shall be calibrated or repaired, as necessary. [District Rule 4702]
19. {4885} After the Altronic Inc. EPC-50 AFRC System is calibrated or repaired in response to a catalyst temperature drop, a District-approved portable analyzer shall be used to determine that the NOx and CO emissions and O2 levels are at or below permitted levels. The pre- and post-catalyst exhaust temperatures shall be monitored and the temperature increase over the catalyst shall be recorded at that time and the temperature increase over the catalyst shall be re-established. Monthly monitoring of the pre- and post-catalyst exhaust temperature shall resume as required in the previous condition, based on the new temperature increase value. [District Rule 4702]
20. {4886} Within 30 days after installation of the Altronic Inc. EPC-50 AFRC System, a District-approved portable analyzer shall be used to determine NOx and CO emissions, and O2 levels. All emission readings shall be taken with the unit operating at conditions representative of normal operations. The analyzer shall be calibrated, maintained, operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702]

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CONDITIONS CONTINUE ON NEXT PAGE

21. {4887} Until this system receives Final Certification from the District, the NO_x, CO, and O₂ monitoring provisions specified above condition shall be conducted at least once every 12 months. Monitoring conducted as part of routine maintenance and repair actions may be used satisfy this requirement, so long as no more than twelve months elapses between monitoring actions. Should the 12 month deadline fall during a period of non-operation, the engine shall be monitoring within 30-calendar days of recommencing operations. [District Rule 4702]
22. {3786} If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than eight (8) hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after eight (8) hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702]
23. {4888} During the start-up inspection, the District shall be provided with written documentation that the emission control system is suitable for use on this engine and verify the engine's horsepower rating, exhaust flow rate, exhaust temperature, oil consumption, general mechanical condition and the available fuel supply pressure will satisfy the criteria for proper operation of the Altronic Inc. EPC-50 AFRC System, along with portable analyzer calibration records and results. [District Rule 4702]
24. {4872} NO_x emissions from this IC engine shall not exceed 90 ppmvd-NO_x @ 15% O₂ (equivalent to 1.3 g-NO_x/bhp-hr). [District Rules 2201 and 4702]
25. PM₁₀ emissions from this IC engine shall not exceed 0.075 g-PM₁₀/bhp-hr. [District Rule 2201]
26. Emissions from this IC engine shall not exceed any of the following limits: 2000 ppmvd CO @ 15% O₂ (equivalent to 16.981 g-CO/bhp-hr) or 50 ppmvd-VOC @ 15% O₂ (equivalent to 0.243 g-VOC/bhp-hr). [District Rules 2201 and 4702]
27. {4894} The operator shall maintain engine operating log records of: 1) the monthly engine hour meter reading; 2) the date and the engine hour meter reading at each oxygen sensor change, and thermocouples change; 3) the monthly pre-and post-catalyst exhaust temperatures monitoring data including the initial temperature differential and any subsequently determined temperature differentials; 4) the date and engine hour meter reading of each catalyst module inspection, washing, and replacement; and 5) fuel purchase records. [District Rule 4702]
28. {3497} 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]
29. {4889} Should Final Certification of the Altronic Inc. EPC-50 AFRC System not be achieved by June 30th, 2018, this engine shall be considered to be uncertified under Rule 4702 and subject to initial and periodic source testing every 60 months, portable analyzer monitoring every 24 months, and a District-approved monthly Inspection & Monitoring plan [District Rule 4702]
30. {4890} The District may revise and/or add requirements in the future as necessary to ensure the Altronic Inc. EPC-50 AFRC System operates according to its Interim Certification requirements. [District Rule 4702]

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