

FEB 14 2017

Gilbert Lemus
Nichols Farms
13762 1st Ave
Hanford, CA 93230

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: C-5838
Project Number: C-1162359

Dear Mr. Lemus:

Enclosed for your review and comment is the District's analysis of Nichols Farms's application for an Authority to Construct to allow two emergency standby IC engines to operate at Nichols Pistachio (Facility #C-862) located adjacent to Nichols Farms (Facility #C-5838), at 13762 1st Ave, Hanford.

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 Ms. Vanesa Gonzalez of Permit Services at (559) 230-5916.

Sincerely,


for Arnaud Marjollet
Director of Permit Services

AM:vg

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
Authority to Construct Application Review
Diesel-Fired Emergency Standby IC Engines

Facility Name: Nichols Farms
Mailing Address: 13762 1st Ave
Hanford, CA 93230

Date: January 25, 2017
Engineer: Vanesa Gonzalez
Lead Engineer: Dustin Brown

Contact Person: Gilbert Lemus
Telephone: (559) 707-9369
Fax: ---
E-Mail: gilbert@nicholsfarms.com
Application #: C-5838-2-1 and -3-1
Project #: C-1162359

Deemed Complete: November 1, 2016

I. Proposal

Nichols Farms has requested an Authority to Construct (ATC) permit for the modification of two emergency IC engines, permit units C-5838-2 and -3. The facility is proposing to add their Nichols Pistachio stationary source, facility C-862, as an additional location where the engines can be operated. Nichols Pistachio is located adjacent to Nichols Farms. However, the facilities have different Source Industrial Codes (SIC) number and are not considered the same stationary source. The following condition will be added to the permit requirements to allow the units to operate at either location.

This unit shall only be operated at 13762 1st Ave, Hanford or 13868 1st Ave, Hanford.
[District Rule 2201]

In addition the facility wide permit for Nichols Pistachio, C-862-0 (Appendix C), will include the following condition to indicate that the two engines can operate as part of the stationary source.

Permit units C-5838-2 and -3 may operate as part of this stationary source. [District Rule 2201]

This evaluation will show compliance for both of the engines operating at either of the two stationary sources as stationary permit units.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (2/18/16)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emission Standards for Hazardous Air Pollutants (5/20/04)

Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4701 Stationary Internal Combustion Engines - Phase 1 (8/21/03)
Rule 4702 Stationary Internal Combustion Engines (11/14/13)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines
California Environmental Quality Act (CEQA)
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The engines may operate at facilities C-5838 and C-862 located at 13762 1st Ave, Hanford and 13868 1st Ave, Hanford respectively. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school at either location. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

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

V. Equipment Listing

Pre-Project Equipment Description:

C-5838-2-0: 464 BHP (INTERMITTENT) CUMMINS MODEL QSL9-G7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

C-5838-3-0: 1,220 BHP (INTERMITTENT) CUMMINS MODEL QSK23-G7 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

Proposed Modification:

C-5838-2-1: MODIFICATION OF 464 BHP (INTERMITTENT) CUMMINS MODEL QSL9-G7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR: ALLOW TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

C-5838-3-1: MODIFICATION OF 1,220 BHP (INTERMITTENT) CUMMINS MODEL QSK23-G7 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR: ALLOW TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

Post Project Equipment Description:

C-5838-2-1: 464 BHP (INTERMITTENT) CUMMINS MODEL QSL9-G7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

C-5838-3-1: 1,220 BHP (INTERMITTENT) CUMMINS MODEL QSK23-G7 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

VI. Emission Control Technology Evaluation

The 464 bhp emergency engine is a Tier 3 certified diesel-fired IC engine that is fired on very low-sulfur diesel fuel. The 1,220 bhp emergency engine is a Tier 2 certified diesel-fired IC engine that is fired on very low-sulfur diesel fuel.

The engines meet the latest Tier Certification requirements; therefore, each engine meets the latest ARB/EPA emissions standards for diesel particulate matter, hydrocarbons, nitrogen oxides, and carbon monoxide.

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

The following assumptions apply to both engines,

Emergency operating schedule:	24 hours/day
Non-emergency operating schedule:	50 hours/year
Density of diesel fuel:	7.1 lb/gal
EPA F-factor (adjusted to 60 °F):	9,051 dscf/MMBtu
Fuel heating value:	137,000 Btu/gal
BHP to Btu/hr conversion:	2,542.5 Btu/bhp-hr
Thermal efficiency of engine:	commonly ≈ 35%
PM ₁₀ fraction of diesel exhaust:	0.96 (CARB, 1988)

The engines are allowed to operate at facility C-5838 and C-862. For worst case for each facility it will be assumed the engines would operate at that facility full time. Compliance will be shown at each facility assuming they operate there full time.

B. Emission Factors

C-5838-2-1:

There is no change in emission factors as a result of this project. Therefore, pre- and post-project emission factors are the same and summarized in the table below.

Emission Factors		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO _x	2.5	Current PTO
SO _x	0.0051	Mass Balance Equation Below
PM ₁₀	0.07	Current PTO
CO	1.7	Current PTO
VOC	0.1	Current PTO

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

C-5838-3-1:

There is no change in emission factors as a result of this project. Therefore, pre- and post-project emission factors are the same and summarized in the table below.

Emission Factors		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO _x	3.7	Current PTO
SO _x	0.0051	Mass Balance Equation Below
PM ₁₀	0.085	Current PTO
CO	0.3	Current PTO
VOC	0.2	Current PTO

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

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Facility C-862

Both engines will be considered new emission units at this facility (Nichols Pistachio). Therefore, PE1 = 0 for all pollutants.

Facility C-5838

C-5838-2-0:

The daily and annual PE is calculated as follows:

$$PE1 = EF \text{ (g/bhp-hr)} \times \text{Rating (bhp)} \times \text{Hours of Operation (hr/day or hr/year)} / 453.6 \text{ g/lb}$$

C-5838-2-0 Pre-Project Emissions (PE1)						
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Annual Hours of Operation (hrs/yr)	Daily PE1 (lb/day)	Annual PE1 (lb/yr)
NO _x	2.5	464	24	50	61.4	128
SO _x	0.0051	464	24	50	0.1	0
PM ₁₀	0.07	464	24	50	1.7	4
CO	1.7	464	24	50	41.7	87
VOC	0.1	464	24	50	2.5	5

C-5838-3-0:

The daily and annual PE is calculated as follows:

$$PE1 = EF \text{ (g/bhp-hr)} \times \text{Rating (bhp)} \times \text{Hours of Operation (hr/day or hr/year)} / 453.6 \text{ g/lb}$$

C-5838-3-0 Pre-Project Emissions (PE1)						
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Annual Hours of Operation (hrs/yr)	Daily PE1 (lb/day)	Annual PE1 (lb/yr)
NO _x	3.7	1,220	24	50	238.8	498
SO _x	0.0051	1,220	24	50	0.3	1
PM ₁₀	0.085	1,220	24	50	5.5	11
CO	0.3	1,220	24	50	19.4	40
VOC	0.2	1,220	24	50	12.9	27

2. Post-Project Potential to Emit (PE2)

The engines are allowed to operate at facility C-5838 and C-862. For worst case at each facility it will be assumed that the engines can operate the maximum hours at the facility.

C-5838-2-1:

The daily and annual PE is calculated as follows:

$$PE2 = EF \text{ (g/bhp-hr)} \times \text{Rating (bhp)} \times \text{Hours of Operation (hr/day or hr/year)} / 453.6 \text{ g/lb}$$

Post-Project Emissions (PE2)						
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Annual Hours of Operation (hrs/yr)	Daily PE2 (lb/day)	Annual PE2 (lb/yr)
NO _x	2.5	464	24	50	61.4	128
SO _x	0.0051	464	24	50	0.1	0
PM ₁₀	0.07	464	24	50	1.7	4
CO	1.7	464	24	50	41.7	87
VOC	0.1	464	24	50	2.5	5

C-5838-3-1:

The daily and annual PE is calculated as follows:

$$PE2 = EF \text{ (g/bhp-hr)} \times \text{Rating (bhp)} \times \text{Hours of Operation (hr/day or hr/year)} / 453.6 \text{ g/lb}$$

Post-Project Emissions (PE2)						
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Annual Hours of Operation (hrs/yr)	Daily PE2 (lb/day)	Annual PE2 (lb/yr)
NO _x	3.7	1,220	24	50	238.8	498
SO _x	0.0051	1,220	24	50	0.3	1
PM ₁₀	0.085	1,220	24	50	5.5	11
CO	0.3	1,220	24	50	19.4	40
VOC	0.2	1,220	24	50	12.9	27

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

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

For facility C-862:

SSPE calculations are included in Appendix G and listed in the table below.

SSPE1 (lb/year)					
Permit Unit	NO_x	SO_x	PM₁₀	CO	VOC
C-862-1-3 (ATC)	0	0	2,701	0	0
C-862-3-10	0	0	17,246	0	0
C-862-19-0					
C-862-4-15	5,120	176	740	12,214	1,604
C-862-5-8	11,592	398	1,676	27,653	3,631
C-862-20-0					
C-862-11-1	0	0	0	0	0
C-862-12-1	0	0	0	0	0
C-862-14-0	0	0	0	0	0
C-862-16-0	2,628	75	219	2,208	145
C-862-17-1	0	0	4	0	0
C-862-18-0	0	0	12	0	0
C-862-21-0	0	0	1,570	0	0
SSPE1	19,340	649	24,168	42,075	5,380

For facility C-5838:

SSPE1 calculations for unit C-5838-1 was taken from previous project C-1141524.

SSPE1 (lb/year)					
Permit Unit	NO_x	SO_x	PM₁₀	CO	VOC
C-5838-1-1	0	0	0	0	698
C-5838-2-0	128	0	4	87	5
C-5838-3-0	498	1	11	40	27
SSPE1	626	1	15	127	730

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

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

For Facility C-862:

SSPE2 (lb/year)					
Permit Unit	NO_x	SO_x	PM₁₀	CO	VOC
C-862-1-2 (ATC)	0	0	2,701	0	0
C-862-3-10	0	0	17,246	0	0
C-862-19-0					
C-862-4-15	5,120	176	740	12,214	1,604
C-862-5-8	11,592	398	1,676	27,653	3,631
C-862-20-0					
C-862-11-1	0	0	0	0	0
C-862-12-1	0	0	0	0	0
C-862-14-0	0	0	0	0	0
C-862-16-0	2,628	75	219	2,208	145
C-862-17-1	0	0	4	0	0
C-862-18-0	0	0	12	0	0
C-862-21-0	0	0	1,570	0	0
C-5838-2-1	128	0	4	87	5
C-5838-3-1	498	1	11	40	27
SSPE2	19,966	650	24,183	42,202	5,412

For Facility C-5838:

SSPE2 (lb/year)					
Permit Unit	NO_x	SO_x	PM₁₀	CO	VOC
C-5838-1-1	0	0	0	0	698
C-5838-2-1	128	0	4	87	5
C-5838-3-1	498	1	11	40	27
SSPE2	626	1	15	127	730

5. Major Source Determination

Rule 2201 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 shall not be included:

- any ERCs associated with the stationary source
- 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

For facility C-862,

Rule 2201 Major Source Determination (lb/year)						
	NO_x	SO_x	PM₁₀	PM_{2.5}	CO	VOC
SSPE1	19,340	649	24,168	24,168	42,075	5,380
SSPE2	19,966	650	24,183	24,183	42,202	5,412
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No	No

Note: PM2.5 assumed to be equal to PM10

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.

For facility C-5838,

Rule 2201 Major Source Determination (lb/year)						
	NO_x	SO_x	PM₁₀	PM_{2.5}	CO	VOC
SSPE1	626	1	15	15	127	730
SSPE2	626	1	15	15	127	730
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No	No

Note: PM2.5 assumed to be equal to PM10

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:

For Facility C-862:

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	9.7	2.7	0.3	21.0	12.1	12.1
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 any regulated NSR pollutant expected to be emitted at this facility.

For Facility C-5838:

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	0.3	0.4	0.0	0.6	0.0	0.0
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 any regulated NSR pollutant expected to be emitted at this facility.

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 facilities are not a Major Source for any pollutant.

Therefore BE = PE1.

For Facility C-862:

Since these are new emissions units, for each engine BE = PE1 = 0 for all pollutants.

For Facility C-5838:

As calculated in Section VII.C.1 above, PE1 is summarized in the following table:

BE (lb/year)						
	NO _x	SO _x	PM ₁₀	PM _{2.5}	CO	VOC
C-5838-2-1	128	0	4	4	87	5
C-5838-3-1	498	1	11	11	40	27

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 both facilities associated with this project are not a major sources 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 facilities C-862 and C-5838 are not a Major Sources for any pollutants, this project does not constitute a Federal Major Modification.

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

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀

I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

The equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

The following table applies to both facilities.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO₂	VOC	SO₂	CO	PM	PM₁₀
Total PE from New and Modified Units	0.3	0.0	0.0	0.1	0.0	0.0
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

As shown in the table above, the potential to emit for the project at both facilities, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

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. Detailed QNEC calculations are included in Appendix H.

VIII. Compliance Determination

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. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- 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 SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

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

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

As discussed in Section I, the facility is proposing to allow the use of two emergency standby IC engines currently permitted at facility C-5838 at facility C-862. These engines are considered new units at facility C-862.

The daily emissions from the new engines are compared to the BACT threshold levels in the following tables:

New Emissions Unit at C-862 BACT Applicability				
Pollutant	Daily Emissions for unit -2-1 (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
NO _x	61.4	> 2.0	n/a	Yes
SO _x	0.1	> 2.0	n/a	No
PM ₁₀	1.7	> 2.0	n/a	No
CO	41.7	> 2.0 and SSPE2 ≥ 200,000 lb/yr	42,202	No
VOC	2.5	> 2.0	n/a	Yes

As shown above, BACT will be triggered for NO_x and VOC emissions from unit C-5838-2-1.

New Emissions Unit at C-862 BACT Applicability				
Pollutant	Daily Emissions for unit -3-1 (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
NO _x	238.8	> 2.0	n/a	Yes
SO _x	0.3	> 2.0	n/a	No
PM ₁₀	5.5	> 2.0	n/a	Yes
CO	19.4	> 2.0 and SSPE2 ≥ 200,000 lb/yr	42,202	No
VOC	12.9	> 2.0	n/a	Yes

As shown above, BACT will be triggered for NO_x, PM₁₀, and VOC emissions from unit C-5838-3-1.

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

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

At facility C-5838, units C-5838-2 and -3 are being modified to make them transportable.

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE2} - (\text{PE1} \times (\text{EF2} / \text{EF1}))$$

C-5838-2-1:

Pollutant	$\text{PE2} - (\text{PE1} \times (\text{EF2} / \text{EF1}))$	AIPE (lb/day)
NOx	$61.4 - (61.4 \times (2.5/2.5))$	0.0
SOx	$0.1 - (0.1 \times (0.0051/0.0051))$	0.0
PM10	$1.7 - (1.7 \times (0.07/0.07))$	0.0
CO	$41.7 - (41.7 \times (1.7/1.7))$	0.0
VOC	$2.5 - (2.5 \times (0.1/0.1))$	0.0

As shown above the AIPE is not greater than 2.0 lb for any pollutant. Therefore BACT is not triggered by unit - 2 when operating at facility C-5838.

C-5838-3-1

Pollutant	$\text{PE2} - (\text{PE1} \times (\text{EF2} / \text{EF1}))$	AIPE (lb/day)
NOx	$238.8 - (238.8 \times (3.7/3.7))$	0.0
SOx	$0.3 - (0.3 \times (0.0051/0.0051))$	0.0
PM10	$5.5 - (5.5 \times (0.085/0.085))$	0.0
CO	$19.4 - (19.4 \times (0.3/0.3))$	0.0
VOC	$12.9 - (12.9 \times (0.2/0.2))$	0.0

As shown above the AIPE is not greater than 2.0 lb for any pollutant. Therefore BACT is not triggered by unit -3 when operating at facility C-5838.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 and/or Federal Major Modification. Therefore BACT is not triggered for any pollutant.

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 E of this report, BACT is satisfied with:

C-5838-2-1:

NO_x: Latest Available Tier Certification level for applicable horsepower*
VOC: Latest Available Tier Certification level for applicable horsepower*

*Note: The certification requirements for emergency engines are as follows: 50 ≤ bhp < 75 – Tier 4I; 75 ≤ bhp < 750 – Tier 3; ≥ 750 bhp – Tier 2.

The facility is proposing to install a 464 bhp Tier 3 certified IC engine. Therefore, BACT is satisfied for NO_x and VOC.

C-5838-3-1:

NO_x: Latest Available Tier Certification level for applicable horsepower*
VOC: Latest Available Tier Certification level for applicable horsepower*
PM₁₀: 0.15 g/bhp-hr

*Note: The certification requirements for emergency engines are as follows: 50 ≤ bhp < 75 – Tier 4I; 75 ≤ bhp < 750 – Tier 3; ≥ 750 bhp – Tier 2.

The facility has proposed to install a 1,220 bhp Tier 2 certified engine with a PM10 certified level of 0.085 g-PM10/bhp-hr. Therefore, BACT is satisfied for NO_x, VOC and PM10.

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

Facility C-862:

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
SSPE2	19,966	650	24,183	42,202	5,412
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	No

Facility C-5838:

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
SSPE2	626	1	15	127	730
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	No

2. Quantity of Offsets Required

As seen above, the SSPE2 is not greater than the offset thresholds at either facility for all the pollutants; therefore offset calculations are not necessary and offsets will not be required for this project at either facility.

C. Public Notification

1. Applicability

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,
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant, and/or
- 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. Since both facilities are existing facilities, 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 engines are considered new emission units at facility C-862. The PE2 for these new units are compared to the daily PE Public Notice thresholds in the following tables:

PE > 100 lb/day Public Notice Thresholds				
Pollutant	C-5838-2-1 PE2 (lb/day)	C-5838-3-1 PE2 (lb/day)	Public Notice Threshold	Public Notice Triggered?
NO _x	61.4	238.8	100 lb/day	Yes
SO _x	0.1	0.3	100 lb/day	No
PM ₁₀	1.7	5.5	100 lb/day	No
CO	41.7	19.4	100 lb/day	No
VOC	2.5	12.9	100 lb/day	No

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

c. Offset Threshold

Facility C-862:

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	19,340	19,966	20,000 lb/year	No
SO _x	649	650	54,750 lb/year	No
PM ₁₀	24,168	24,183	29,200 lb/year	No
CO	42,075	42,202	200,000 lb/year	No
VOC	5,380	5,412	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.

Facility C-5838:

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	626	626	20,000 lb/year	No
SO _x	1	1	54,750 lb/year	No
PM ₁₀	15	15	29,200 lb/year	No
CO	127	127	200,000 lb/year	No
VOC	730	730	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.

Facility C-862:

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	19,966	19,340	626	20,000 lb/year	No
SO _x	650	649	1	20,000 lb/year	No
PM ₁₀	24,183	24,168	15	20,000 lb/year	No
CO	42,202	42,075	127	20,000 lb/year	No
VOC	5,412	5,380	32	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

Facility C-5838:

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	626	626	0	20,000 lb/year	No
SO _x	1	1	0	20,000 lb/year	No
PM ₁₀	15	15	0	20,000 lb/year	No
CO	127	127	0	20,000 lb/year	No
VOC	730	730	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

Since neither facility has 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 NO_x emissions in excess of 100 lb/day. 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.

C-5838-2-1:

- {4771} Emissions from this IC engine shall not exceed any of the following limits: 2.5 g-NO_x/bhp-hr, 1.7 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- {4772} Emissions from this IC engine shall not exceed 0.07 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]

- {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]

C-5838-3-1:

- {4771} Emissions from this IC engine shall not exceed any of the following limits: 3.7 g-NO_x/bhp-hr, 0.3 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- {4772} Emissions from this IC engine shall not exceed 0.085 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- {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]

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required for emergency standby IC engines to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

Recordkeeping requirements, in accordance with District Rule 4702, will be discussed in Section VIII, *District Rule 4702*, of this evaluation.

4. Reporting

No reporting is required to ensure compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

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 Appendix F 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 2410 Prevention of Significant Deterioration

As shown in Section VII.C.9 above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

Since the facilities potential emissions do not exceed any major source thresholds of Rule 2201, this facility is not a major source, and Rule 2520 does not apply.

Rule 4001 New Source Performance Standards (NSPS)

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

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

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)

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. Therefore, the following condition will be listed on the ATC:

- {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 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.

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. The RMR was performed assuming the engines are only operating at Nichol’s Pistachio, facility C-862 since the engines have already been modeled at facility C-5838.

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 (Appendix F), 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
C-5838-2-1	0.218 per million	No
C-5838-3-1	0.251 per million	No

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 not required for this project because the HRA indicates that the risk is not above the District’s thresholds for triggering T-BACT requirements; 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 Appendix F of this report, the emissions increases for this project was determined to be less than significant.

C-5838-2-1:

The following conditions will be listed on the ATC:

- {4772} Emissions from this IC engine shall not exceed 0.085 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- 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]

- {4777} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201, 4702 and 17 CCR 93115]

C-5838-3-1:

The following conditions will be listed on the ATC:

- {4772} Emissions from this IC engine shall not exceed 0.085 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- 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]
- {4777} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201, 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 two new engines each have a PM₁₀ emission factor less than 0.4 g/bhp-hr. Therefore, compliance is expected and the following condition will be listed on the ATCs:

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

Rule 4701 Internal Combustion Engines - Phase 1

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

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

Rule 4702 Internal Combustion Engines

The following summarizes District Rule 4702 Requirements for emergency standby IC engines:

1. Operation of emergency standby engines is limited to 100 hours or less per calendar year for non-emergency purposes. The Air Toxic Control Measure for Stationary Compression Ignition Engines (Stationary ATCM) limits this engine maintenance and testing to 50 hours/year; therefore, compliance is expected. The following condition will be included on the permits:
 - {4777} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201 and 4702, and 17 CCR 93115]
2. Properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier. The following condition will be included on the permits:
 - {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]
3. 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 permits:
 - {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]
4. Install and operate a nonresettable elapsed time meter. In lieu of installing a nonresettable elapsed time meter, the operator may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA and is allowed by Permit-to-Operate condition. The operator shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

The following condition shall be used:

- {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]

5. 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 permits:
 - {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
 - {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]

6. Records of the total hours of operation, type of fuel used, purpose for operating the engine, all hours of non-emergency and emergency operation, and other 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. The following conditions will be included on the permits:
 - {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]
 - {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
 - {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

Rule 4801 Sulfur Compounds

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

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

n = moles SO₂

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

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

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

Since 1.0 ppmv is \leq 2,000 ppmv, these engines are expected to comply with Rule 4801. Therefore, the following condition will be listed on the ATCs to ensure compliance:

- {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is 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 requirements apply to both engines in this project.

Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators	Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements
Emergency engine(s) must be fired on CARB diesel fuel, or an approved alternative diesel fuel.	The applicant has proposed the use of CARB certified diesel fuel. The proposed permit condition, requiring the use of CARB certified diesel fuel, was included earlier in this evaluation.
The engine(s) must meet the emission standards in Table 1 of the ATCM for the specific power rating and model year of the proposed engine.	The applicant has proposed the use of engines that are certified to the latest EPA Tier Certification standards for the applicable horsepower range, guaranteeing compliance with the emission standards of the ATCM. 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 permits: <ul style="list-style-type: none"> • {4777} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201 and 4702, and 17 CCR 93115]

<p>Engines, with a PM10 emissions rate greater than 0.01 g/bhp-hr and located at schools, may not be operated for maintenance and testing whenever there is a school sponsored activity on the grounds. Additionally, engines located within 500 feet of school grounds may not be operated for maintenance and testing between 7:30 AM and 3:30 PM</p>	<p>The District has verified that these engines are not located within 500' of a school.</p>
<p>A non-resettable hour meter with a minimum display capability of 9,999 hours shall be installed upon engine installation, or by no later than January 1, 2005, on all engines subject to all or part of the requirements of sections 93115.6, 93115.7, or 93115.8(a) unless the District determines on a case-by-case basis 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.</p>	<p>The following condition will be included on the permits:</p> <ul style="list-style-type: none"> • {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]
<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)

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.

Greenhouse Gas (GHG) Significance Determination

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)).

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The criteria pollutant emissions and toxic air contaminant emissions associated with the proposed project are not significant, and there is minimal potential for public concern for this particular type of facility/operation. Therefore, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATCs C-5838-2-1 and -3-1 subject to the permit conditions on the attached draft ATCs in Appendix A.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-5838-2-1	3020-10-D	464 bhp IC engine	\$525
C-5838-3-1	3020-10-F	1,220 bhp IC engine	\$820

Appendixes

- A: Draft ATCs
- B: Current PTOs
- C: Facility Wide Requirements for C-862
- D: BACT Guideline
- E: BACT Analysis
- F: HRA Summary and AAQA
- G: SSPE Calculations Facility C-862
- H: Quarterly Net Emissions Change

APPENDIX A
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-5838-2-1

LEGAL OWNER OR OPERATOR: NICHOLS FARMS
MAILING ADDRESS: 13762 1ST AVE
HANFORD, CA 93230

LOCATION: 13762 1ST AVE
HANFORD, CA 93230

EQUIPMENT DESCRIPTION:

MODIFICATION OF 464 BHP (INTERMITTENT) CUMMINS MODEL QSL9-G7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR: ALLOW TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

CONDITIONS

1. This unit shall only be operated at 13762 1st Ave, Hanford or 13868 1st Ave, Hanford. [District Rule 2201]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. {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]
7. {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]
8. Emissions from this IC engine shall not exceed any of the following limits: 2.5 g-NOx/bhp-hr, 1.7 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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
C-5838-2-1: Jan 25 2017 11:28AM - GONZALEV Joint Inspection NOT Required

9. Emissions from this IC engine shall not exceed 0.07 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
10. {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]
11. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
12. {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115]
13. {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 and 17 CCR 93115]
14. {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]
15. {4777} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201 and 4702, and 17 CCR 93115]
16. {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
17. {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-5838-3-1

LEGAL OWNER OR OPERATOR: NICHOLS FARMS
MAILING ADDRESS: 13762 1ST AVE
HANFORD, CA 93230

LOCATION: 13762 1ST AVE
HANFORD, CA 93230

EQUIPMENT DESCRIPTION:

MODIFICATION OF 1,220 BHP (INTERMITTENT) CUMMINS MODEL QSK23-G7 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR: ALLOW TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

CONDITIONS

1. This unit shall only be operated at 13762 1st Ave, Hanford or 13868 1st Ave, Hanford. [District Rule 2201]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. {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]
7. {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]
8. Emissions from this IC engine shall not exceed any of the following limits: 3.7 g-NOx/bhp-hr, 0.3 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Marjolle, Director of Permit Services
C-5838-3-1 Jan 25 2017 11:28AM - GONZALEV Joint Inspection NOT Required

9. Emissions from this IC engine shall not exceed 0.085 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
10. {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]
11. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
12. {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115]
13. {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 and 17 CCR 93115]
14. {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]
15. {4777} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201 and 4702, and 17 CCR 93115]
16. {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
17. {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

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APPENDIX B
Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-5838-2-0

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

464 BHP (INTERMITTENT) CUMMINS MODEL QSL9-G7 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. 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. 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. 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: 2.5 g-NOx/bhp-hr, 1.7 g-CO/bhp-hr, or 0.1 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
8. Emissions from this IC engine shall not exceed 0.07 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
10. 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. 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 and 17 CCR 93115]
12. 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 and 17 CCR 93115]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. 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. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201 and 4702, and 17 CCR 93115]
15. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
16. 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]

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-5838-3-0

EXPIRATION DATE: 11/30/2019

EQUIPMENT DESCRIPTION:

1,220 BHP (INTERMITTENT) CUMMINS MODEL QSK23-G7 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. 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. 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. 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: 3.7 g-NOx/bhp-hr, 0.3 g-CO/bhp-hr, or 0.2 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
8. Emissions from this IC engine shall not exceed 0.085 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
10. 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. 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 and 17 CCR 93115]
12. 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 and 17 CCR 93115]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. 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. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201 and 4702, and 17 CCR 93115]
15. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
16. 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]

These terms and conditions are part of the Facility-wide Permit to Operate.

APPENDIX C
Facility Wide Requirements for C-862

San Joaquin Valley
Air Pollution Control District

FACILITY: C-862-0-0

EXPIRATION DATE: 09/30/2017

FACILITY-WIDE REQUIREMENTS

1. Permit units C-5838-2 and -3 may operate as part of this stationary source. [District Rule 2201]

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: NICHOLS PISTACHIO
Location: 13868 FIRST AVE, HANFORD, CA 93230
C-862-0-0 Jan 25 2017 1:34PM - GONZALEV

APPENDIX D
BACT Guideline

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 3.1.1*

Last Update: 9/10/2013

Emergency Diesel IC engine

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

*Note: for emergency engines 50 <= bhp < 75, Tier 4 Interim certification is the requirement; for emergency engines 75 <= bhp < 750, Tier 3 certification is the requirement; for emergency engines => 750 bhp, Tier 2 certification is the requirement.

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

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

APPENDIX E
BACT Analysis

Top Down BACT Analysis for the Emergency IC Engines

C-5838-2-1:

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

1. BACT Analysis for NO_x and VOC Emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

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

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

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

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

Title 17 CCR, Section 93115.6(a)(3)(A) (CARB stationary diesel engine ATCM) applies to emergency standby diesel-fired engines and requires that such engines be certified to the emission levels in Table 1 (below).

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)	3.7 (5.0)
	4i	2008+		3.5 (4.7)	
75 ≤ HP < 100 (56 ≤ kW < 75)	2	2007	0.15 (0.20)	5.6 (7.5)	3.7 (5.0)
	3	2008+		3.5 (4.7)	
100 ≤ HP < 175 (75 ≤ kW < 130)	3	2007	0.15 (0.20)	3.0 (4.0)	3.7 (5.0)
		2008+			
175 ≤ HP < 300 (130 ≤ kW < 225)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
300 ≤ HP < 600 (225 ≤ kW < 450)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
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+			

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

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

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

The proposed engine is rated at 464 hp. Therefore, the applicable control technology option is EPA Tier 3 certification.

b. Step 2 - Eliminate technologically infeasible options

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

c. Step 3 - Rank remaining options by control effectiveness

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

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

BACT for NO_x and VOC will be the use of an EPA Tier 3 certified engine. The applicant is proposing such a unit. Therefore, BACT will be satisfied.

C-5838-3-1:

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

1. BACT Analysis for NO_x and VOC Emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

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

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

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

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

Title 17 CCR, Section 93115.6(a)(3)(A) (CARB stationary diesel engine ATCM) applies to emergency standby diesel-fired engines and requires that such engines be certified to the emission levels in Table 1 (below).

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)	3.7 (5.0)
	4i	2008+		3.5 (4.7)	
75 ≤ HP < 100 (56 ≤ kW < 75)	2	2007	0.15 (0.20)	5.6 (7.5)	3.7 (5.0)
	3	2008+		3.5 (4.7)	
100 ≤ HP < 175 (75 ≤ kW < 130)	3	2007	0.15 (0.20)	3.0 (4.0)	3.7 (5.0)
		2008+			
175 ≤ HP < 300 (130 ≤ kW < 225)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
300 ≤ HP < 600 (225 ≤ kW < 450)	3	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
		2008+			
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+			

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

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

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

The proposed engine is rated at 1,220 hp. Therefore, the applicable control technology option is EPA Tier 2 certification.

b. Step 2 - Eliminate technologically infeasible options

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

c. Step 3 - Rank remaining options by control effectiveness

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

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

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

2. BACT Analysis for PM₁₀ Emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

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

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

Please note Tier 2, 3, or 4i IC engines do not have a PM emission standard that is more stringent than 0.15 g/hp-hr. Additionally, the ATCM requires a PM emission standard of 0.15 g/hp-hr for all new emergency diesel IC engines.

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

b. Step 2 - Eliminate technologically infeasible options

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

c. Step 3 - Rank remaining options by control effectiveness

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

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

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

APPENDIX F
HRA Summary and AAQA

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Vanesa Gonzalez – Permit Services
 From: Cheryl Lawler – Technical Services
 Date: December 8, 2016
 Facility Name: Nichols Farms
 Location: 13762 1st Street, Hanford
 Application #(s): C-5838 2-1 & 3-1
 Project #: C-1162359

A. RMR SUMMARY

RMR Summary				
Categories	Emergency Diesel ICE (Unit 2-1)	Emergency Diesel ICE (Unit 3-1)	Project Totals	Facility Totals
Prioritization Score	NA ¹	NA ¹	>1.0	>1.0
Acute Hazard Index	N/A ²	N/A ²	N/A ²	0.00
Chronic Hazard Index	0.00	0.00	0.00	0.00
Maximum Individual Cancer Risk	2.18E-07	2.51E-07	4.69E-07	5.11E-07
T-BACT Required?	No	No		
Special Permit Requirements?	Yes	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 Hazard Index was not calculated since there is no risk factor or the risk factor is so low that it has been determined to be insignificant for this type of unit.

Proposed Permit Requirements

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

Unit 2-1

1. The PM10 emissions rate shall not exceed 0.07 g/bhp-hr based on US EPA certification using ISO 8178 test procedure.
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.
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.

Unit 3-1

1. The PM10 emissions rate shall not exceed 0.085 g/bhp-hr based on US EPA certification using ISO 8178 test procedure.
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.
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.

B. RMR REPORT

I. Project Description

Technical Services received a request on December 1, 2016, to perform an Ambient Air Quality Analysis (AAQA) and a Risk Management Review (RMR) for two emergency diesel IC engines currently permitted to operate at Nichols Farms (C-5838). The facility is not proposing to change where the engines can operate at that facility. However, they are proposing to designate the engines as transportable and allow them to operate at Nichols Pistachio (C-862). Nichols Pistachio is located directly south of Nichols Farms. At Nichols Pistachio the engines are proposed to be allowed to operate anywhere on that site.

II. Analysis

Toxic emissions for this project were calculated using PM10 emission rates calculated and supplied by the processing engineer, 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 project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines. The prioritization score for this proposed facility was 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 2007-2010 from Visalia 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 2-1			
Source Type	Point	Location Type	Rural
Stack Height (m)	1.68	Closest Receptor (m)	25
Stack Diameter (m)	0.15	Type of Receptor	Business
Stack Exit Velocity (m/s)	57.57	PM10 Emission Rate	4 lbs/yr
Stack Exit Temp. (°K)	787	Fuel Type	Diesel

Analysis Parameters Unit 3-1			
Source Type	Point	Location Type	Rural
Stack Height (m)	2.13	Closest Receptor (m)	25
Stack Diameter (m)	0.25	Type of Receptor	Business
Stack Exit Velocity (m/s)	60.31	PM10 Emission Rate	11 lbs/yr
Stack Exit Temp. (°K)	787	Fuel Type	Diesel

Technical Services also 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.
2-1	0	128	0	0	0	87	0	4
3-1	0	498	0	1	0	40	0	11

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*

Two Diesel ICEs	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	NA ¹	X	NA ¹	X	X
NO _x	NA ¹	X	X	X	Pass
SO _x	NA ¹	NA ¹	X	NA ¹	Pass
PM ₁₀	X	X	X	NA ¹	Pass ²
PM _{2.5}	X	X	X	NA ¹	Pass ²

*Results were taken from the attached PSD spreadsheet.

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

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

III. Conclusion

The Acute and Chronic Indices are below 1.0, and the Cancer Risk factor associated with the units are less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the units are approved without 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 these project units.

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 Form & Attachments
- B. Convert Calculations
- C. Risk Results
- D. Facility Summary
- E. AAQA Summary

APPENDIX G
SSPE Calculations C-862

C-862-1-3:

Per recently finalized project C-1162538 the PE for this unit is 2,701 lb-PM10/year.

C-862-3-10 and -19-0:

Pistachio receiving operations

Assumptions:

- For worst case annual operation is 365 day/year.
- PM10 is the only pollutant of concern.
- The combined maximum daily throughput of in-hull pistachios processed at the pre-cleaning operation for permit units C-862-3 and C-862-19 shall not exceed 2,625 tons in any one day. (Per current PTO)
- The combined maximum daily throughput of in-hull pistachios processed at the main huller operation for permit units C-862-3 and C-862-19 shall not exceed 2,625 tons in any one day. (Per current PTO)

Emission Factors:

PM10 emission rate from the pre-cleaning operation shall not exceed 0.013 lb-PM10/ton of in-hull pistachios processed, per current PTO. PM10 emission rate from the main huller operation shall not exceed 0.005 lb-PM10/ton of in-hull pistachios processed, per current PTO.

Calculation:

$$\begin{aligned} \text{PE} &= [(\text{Pre-Cleaner Throughput} \times \text{Pre-Cleaner Emission Factor}) + (\text{Huller Throughput} \times \text{Huller Emission Factor})] \times 365 \text{ day/year} \\ &= [(2,625 \text{ tons/day} \times 0.013 \text{ lb-PM10/ton}) + (2,625 \text{ tons} \times 0.005 \text{ lb-PM10/ton})] \times 365 \text{ day/year} \\ &= 17,246 \text{ lb-PM10/day} \end{aligned}$$

C-862-4-15:

Pistachio Storage Silos

Annual emissions were taken from recently completed project C-1150056 and summarized in the table below.

Pollutant	PE (lb/yr)
NO _x	5,120
SO _x	176
PM ₁₀	740
CO	12,214
VOC	1,604

C-862-5-8 and 20-0:

Nut drying operations

Assumptions:

- Per current PTOs annual combined fuel use for all dryers on permit units C-862-5 and C-862-20 shall not exceed 139,660 MMBtu of natural gas in a calendar year.

The emission factors were taken from the current PTOs and are listed in the table below.

Pollutant	EF (lb/MMBtu)
NO _x	0.083
SO _x	0.00285
PM ₁₀	0.012
CO	0.198
VOC	0.026

Calculations:

The combined annual emissions for units C-862-5 and -20 can be calculated as follows.

PE = Emission Factor x Total Annual Heat Input

Annual Potential Emissions (PE)			
Pollutant	Emission Factors (lb/MMBtu)	Total Annual Heat Input (MMBtu/yr)	PE (lb/yr)
NO _x	0.083	139,660	11,592
SO _x	0.00285	139,660	398
PM ₁₀	0.012	139,660	1,676
CO	0.198	139,660	27,653
VOC	0.026	139,660	3,631

C-862-11-1, -12-1 and -14-0:

Fumigation Operations

The three fumigation operations use Aluminum Phosphide, Eco2Fume or phosphine gas to fumigate. The byproducts of these fumigants are phosphine gas, ammonia gas, and carbon dioxide. These units do not emit NO_x, SO_x, PM₁₀, CO or VOC emissions. Therefore, PE = 0 lb/year.

C-862-16-0:

3.0 MMBtu/hr Natural gas-fired roaster

Assumptions:

- Annual operating schedule is 365 day/year (worst case)
- The maximum daily throughput of pistachios processed by this roaster shall not exceed 36 tons in any one day. (Per current PTO)

Emission Factors:

Per current PTO, the emission factor for the processed pistachios is 0.00146 lb-PM₁₀ per ton. The emission factors for the natural gas-fired roaster was also taken from the current PTO and summarized in the table below.

Pollutant	Emission Factor (lb/MMBtu)
NO _x	0.1
SO _x	0.00285
PM ₁₀	0.0076
CO	0.084
VOC	0.0055

Calculations:

PM₁₀ for the processing of the pistachio nuts is calculated as follows,

$$\begin{aligned}
 PE &= \text{Emission Factor} \times \text{Daily Throughput} \times 365 \text{ day/year} \\
 &= 0.00146 \text{ lb-PM}_{10}/\text{ton} \times 36 \text{ ton/day} \times 365 \text{ day/year} \\
 &= 19 \text{ lb-PM}_{10}/\text{year}
 \end{aligned}$$

$$\begin{aligned}
 \text{Annual Heat Input} &= 3.0 \text{ MMBtu/hr} \times 24 \text{ hr/day} \times 365 \text{ day/year} \\
 &= 26,280 \text{ MMBtu/year}
 \end{aligned}$$

$$PE = \text{Emission Factor} \times \text{Total Annual Heat Input}$$

Annual Potential Emissions (PE)			
Pollutant	Emission Factors (lb/MMBtu)	Annual Heat Input (MMBtu/yr)	PE (lb/yr)
NO _x	0.1	26,280	2,628
SO _x	0.00285	26,280	75
PM ₁₀	0.0076	26,280	200
CO	0.084	26,280	2,208
VOC	0.0055	26,280	145

$$\begin{aligned}
 PE \text{ PM}_{10} &= 19 \text{ lb-PM}_{10}/\text{year} + 200 \text{ lb-PM}_{10}/\text{year} \\
 &= 219 \text{ lb-PM}_{10}/\text{year}
 \end{aligned}$$

C-862-17-1:

Pistachio and Almond Finishing Line

Assumptions:

- Annual operating schedule is 365 day/year (worst case)
- The maximum daily throughput of pistachios processed by this roaster shall not exceed 72 tons in any one day. (Per current PTO)

Emission Factors:

Per current PTO, the emission factor for the processed pistachios and almonds is 0.00016 lb-PM₁₀ per ton.

Calculations:

PM10 for the processing of the pistachio nuts is calculated as follows,

$$\begin{aligned} PE &= \text{Emission Factor} \times \text{Daily Throughput} \times 365 \text{ day/year} \\ &= 0.00016 \text{ lb-PM}_{10}/\text{ton} \times 72 \text{ ton/day} \times 365 \text{ day/year} \\ &= 4 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

C-862-18-0:

Pistachio Finishing Line

Assumptions:

- Annual operating schedule is 365 day/year (worst case)
- The maximum daily throughput of pistachios processed by this roaster shall not exceed 200 tons in any one day. (Per current PTO)

Emission Factors:

Per current PTO, the emission factor for the processed pistachios and almonds is 0.00016 lb-PM₁₀ per ton.

Calculations:

PM10 for the processing of the pistachio nuts is calculated as follows,

$$\begin{aligned} PE &= \text{Emission Factor} \times \text{Daily Throughput} \times 365 \text{ day/year} \\ &= 0.00016 \text{ lb-PM}_{10}/\text{ton} \times 200 \text{ ton/day} \times 365 \text{ day/year} \\ &= 12 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

C-862-21-0

Almond Sorting and Sizing

Assumptions:

- Annual operating schedule is 365 day/year (worst case)
- The maximum daily throughput of pistachios processed by this roaster shall not exceed 100 tons in any one day. (Per current PTO)

Emission Factors:

Per current PTO, the emission factor for the processed pistachios is 0.043 lb-PM₁₀ per ton.

Calculations:

PM₁₀ for the processing of the pistachio nuts is calculated as follows,

$$\begin{aligned} PE &= \text{Emission Factor} \times \text{Daily Throughput} \times 365 \text{ day/year} \\ &= 0.043 \text{ lb-PM}_{10}/\text{ton} \times 100 \text{ ton/day} \times 365 \text{ day/year} \\ &= 1,570 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

APPENDIX H
Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. For PAS purposes the engines are listed under facility C-5838 and the QNEC will be calculated for that facility only. 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 values in Sections VII.C.2 and VII.C.1 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

As an example for PM10 emissions for unit C-5838-2-1

$$\begin{aligned} \text{PE2}_{\text{quarterly}} &= \text{PE2}_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 4 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 1 \text{ lb PM}_{10}/\text{qtr} \end{aligned}$$

$$\begin{aligned} \text{PE1}_{\text{quarterly}} &= \text{PE1}_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 4 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 1 \text{ lb PM}_{10}/\text{qtr} \end{aligned}$$

C-5838-2-1 Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO _x	32	32	0
SO _x	0	0	0
PM ₁₀	1	1	0
CO	22	22	0
VOC	1	1	0

C-5838-3-1 Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO _x	125	125	0
SO _x	0	0	0
PM ₁₀	3	3	0
CO	10	10	0
VOC	7	7	0