



MAR 14 2017

Michael McGovern
County of Tulare-Resource Management Agency
5953 S Mooney Blvd
Visalia, CA 93277

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: S-8924
Project Number: S-1163691

Dear Mr. McGovern:

Enclosed for your review and comment is the District's analysis of County of Tulare-Resource Management Agency's application for an Authority to Construct for an emergency IC engine, at 1960 Scranton Ave, Porterville, CA.

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

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Richard Edgehill of Permit Services at (661) 392-5617.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:rue

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Appendix A
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-8924-1-0

LEGAL OWNER OR OPERATOR: COUNTY OF TULARE - RESOURCE MGMT. AGENCY
MAILING ADDRESS: 5953 S. MOONEY BLVD.
VISALIA, CA 93277-9394

LOCATION: 1960 W. SCRANTON AVE
PORTERVILLE, CA 93257

EQUIPMENT DESCRIPTION:
2923 BHP MITSUBISHI MODEL S16R-Y2PTAW2-1 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. {4749} This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115]
6. {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]
7. Emissions from this IC engine shall not exceed any of the following limits: 4.0 g-NOx/bhp-hr, 0.45 g-CO/bhp-hr, or 0.42 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
8. Emissions from this IC engine shall not exceed 0.13 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

S-4924-1-0; Feb 10 2017 1:25PM - EDGERLR : Joint Inspection NOT Required

9. {4261} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
10. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
11. {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115]
12. {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702 and 17 CCR 93115]
13. {3496} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
14. {4920} 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, 4102, and 4702, and 17 CCR 93115]
15. {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
16. {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

DRAFT

Appendix B
BACT Guideline and BACT Analysis

San Joaquin Valley Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 3.1.1
Last Update: 9/10/2013
Emergency Diesel IC Engine

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

*Note: The certification requirements are as follows: for emergency engines $50 \leq \text{bhp} < 75$ - Tier 4 Interim; for emergency engines $75 \leq \text{bhp} < 750$ - Tier 3; for emergency engines ≥ 750 bhp - Tier 2.

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

Top Down BACT Analysis for the Emergency IC Engine

BACT Guideline 3.1.1 (September 10, 2013) applies to emergency diesel IC engines. In accordance with the District BACT policy, information from that Guideline will be utilized without further analysis.

1. BACT Analysis for NO_x, VOC, and CO 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 does not meet the definition of a nonroad engine. Therefore, only Title 17 CCR, Section 93115 applies directly to the proposed emergency engine.

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

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

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 2923 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, VOC, and CO 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 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 C
Emissions Data Sheet and or ARB/EPA Certification

KOHLER. Power Systems

1750REOZMD

60 HZ. DIESEL INDUSTRIAL GENERATOR SET EMISSION DATA SHEET

ENGINE INFORMATION

Model:	Mitsubishi, S16R-Y2PTAW2-1	Bore:	170mm (6.69 in.)
Nameplate BHP @ 1800 RPM:	2923	Stroke:	180mm (7.09 in.)
Type:	4-Cycle, 16-V Cylinder	Displacement:	65.4 L (3989 cu. in.)
Aspiration:	Turbocharged	EPA Family:	GMVXL65.4BBA
Compression Ratio	14.0:1	EPA Certificate	GMVXL65.4BBA-012
Emission Control Device	Turbocharged and after cooled		

Table 1

PERFORMANCE DATA:

Engine kW @ Stated Load
Fuel Consumption (g/kWh)
Exhaust Gas Flow (m³/s)
Exhaust Temperature (°C)

	1/4 Standby	1/2 Standby	3/4 Standby	Full Standby
Engine kW @ Stated Load	438.00	845.00	1313.00	1750.00
Fuel Consumption (g/kWh)	258.00	233.00	229.00	235.00
Exhaust Gas Flow (m ³ /s)				7.38
Exhaust Temperature (°C)				505.00

EXHAUST EMISSION DATA:

HC (Total Unburned Hydrocarbons)
NOx (Oxides of Nitrogen as NO₂)
CO (Carbon Monoxide)
PM (Particular Matter)

**Table 2
EPA CERTIFICATE DATA**

HC (Total Unburned Hydrocarbons)	0.56
NOx (Oxides of Nitrogen as NO ₂)	5.36
CO (Carbon Monoxide)	0.60
PM (Particular Matter)	0.17

Values are in g/kWh

TEST METHODS AND CONDITIONS

Data was recorded during steady-state rated engine speed (± 25 RPM) with full load ($\pm 2\%$). Pressures,

temperatures, and emission rates were stabilized

Fuel Spec	Type 2-D and ASTM D975 No.2D
Fuel Temperature	37 \pm 10 °C
Intake Temperature	25 °C
Barometric Pressure	100 kPa (29.6 In Hg)
Relative Humidity	30 %
Standard	ISO 8178

The emission data here were taken from a single engine under the test condition shown above. These data are subjected to instrumentation and engine to engine variability.

Data and specifications subject to change without notice
For further information, please contact MENA, 630-268-0750



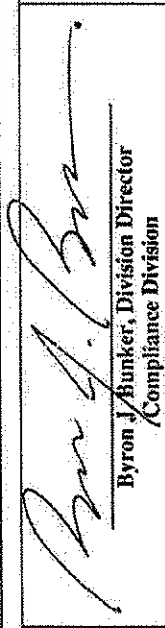
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
2016 MODEL YEAR
CERTIFICATE OF CONFORMITY
WITH THE CLEAN AIR ACT

**OFFICE OF TRANSPORTATION
 AND AIR QUALITY
 ANN ARBOR, MICHIGAN 48105**

Certificate Issued To: Mitsubishi Heavy Industries, Ltd.
 (U.S. Manufacturer or Importer)

Certificate Number: GMVXL65.4BBA-012

Effective Date:
 11/03/2015
Expiration Date:
 12/31/2016


 Byron J. Bunker, Division Director
 Compliance Division

Issue Date:
 11/03/2015
Revision Date:
 N/A

Model Year: 2016
Manufacturer Type: Original Engine Manufacturer
Engine Family: GMVXL65.4BBA

Mobile/Stationary Indicator: Stationary
Emissions Power Category: 560<KW<=2237
Fuel Type: Diesel
After Treatment Devices: No After Treatment Devices Installed
Non-after Treatment Devices: Engine Design Modification

Pursuant to Section 111 and Section 213 of the Clean Air Act (42 U.S.C. sections 7411 and 7547) and 40 CFR Part 60, and subject to the terms and conditions prescribed in those provisions, this certificate of conformity is hereby issued with respect to the test engines which have been found to conform to applicable requirements and which represent the following engines, by engine family, more fully described in the documentation required by 40 CFR Part 60 and produced in the stated model year.

This certificate of conformity covers only those new compression-ignition engines which conform in all material respects to the design specifications that applied to those engines described in the documentation required by 40 CFR Part 60 and which are produced during the model year stated on this certificate of the said manufacturer, as defined in 40 CFR Part 60.

It is a term of this certificate that the manufacturer shall consent to all inspections described in 40 CFR 1068 and authorized in a warrant or court order. Failure to comply with the requirements of such a warrant or court order may lead to revocation or suspension of this certificate for reasons specified in 40 CFR Part 60. It is also a term of this certificate that this certificate may be revoked or suspended or rendered void *ab initio* for other reasons specified in 40 CFR Part 60.

This certificate does not cover engines sold, offered for sale, or introduced, or delivered for introduction, into commerce in the U.S. prior to the effective date of the certificate.

Appendix D
Technical Services Memo and AAQA

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Richard Egdehill – Permit Services
 From: Anji Amachree – Technical Services
 Date: February 28, 2017
 Facility Name: Tulare County South Detention Facility
 Location: 1960 W Scranton Ave Porterville, CA 93257
 Application #(s): S-8924-1-0
 Project #: S-1163691

A. RMR SUMMARY

RMR Summary			
Categories	Diesel ICE (Unit 1-0)	Project Totals	Facility Totals
Prioritization Score	NA ¹	>1.0	>1.0
Acute Hazard Index	N/A ²	N/A ²	0.00
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk	2.27E-07	2.27E-07	2.27E-07
T-BACT Required?	No		
Special Permit Requirements?	Yes		

¹Prioritization 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.

²Acute and Chronic Hazard Indices were 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 # 1-0

1. The PM10 emissions rate shall not exceed 0.13 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 February 28th, 2017, to perform an Ambient Air Quality Analysis and a Risk Management Review for a diesel-fired emergency IC engine rated at 2923 bhp and powering an electrical generator.

II. Analysis

Diesel particulate emissions for this proposed unit were calculated and provided by the processing engineer, and input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). 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. Therefore, a refined health risk assessment was required. The AERMOD model was used, with the parameters outlined below and meteorological data for 2006-2009 from Porterville 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 1-0			
Source Type	Point	Location Type	Rural
Stack Height (m)	6.1	Closest Receptor (m)	18
Stack Diameter. (m)	0.36	Type of Receptor	Residential
Stack Exit Velocity (m/s)	82.22	Max Hours per Year	8760
Stack Exit Temp. (°K)	799	Fuel Type	Diesel
		DPM Emissions (lbs/yr)	42

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

Unit #	NO _x (Lbs.)		SO _x (Lbs.)		CO (Lbs.)		PM ₁₀ (Lbs.)	
	Hr.	Yr.	Hr.	Yr.	Hr.	Yr.	Hr.	Yr.
1-0	0	1289	0	2	0	145	0	42

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*

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

*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).

³The court has vacated EPA's PM_{2.5} SILs. Until such time as new SIL values are approved, the District will use the corresponding PM₁₀ SILs for both PM₁₀ and PM_{2.5} analyses.

III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk factor associated with the project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

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

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

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

IV. Attachments

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

Appendix E
QNEC Calculations

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

$QNEC = PE2 - PE1$, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr
- PE2 = Post-Project Potential to Emit for each emissions unit, lb/qtr
- PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr

Since this is a new unit, $PE1 = 0$ for all pollutants. Thus, $QNEC = PE2$ (lb/qtr).

Using the PE2 (lb/yr) values calculated in Section VII.C.2, Quarterly PE2 is calculated as follows:

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

QNEC		
Pollutant	PE2 Total (lb/yr)	Quarterly PE2 (lb/qtr)
NO _x	1,289	322.3
SO _x	2	0.5
PM ₁₀	42	10.5
CO	145	36.3
VOC	135	33.8