

MAR 16 2017

Mike Porter
Visalia Emergency Communications Center
315 E. Acequia Avenue
Visalia, CA 93291

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: S-8973
Project Number: S-1170426

Dear Mr. Porter:

Enclosed for your review and comment is the District's analysis of Visalia Emergency Communications Center's application for an Authority to Construct for the installation of one 1,214 hp diesel-fired Tier 2-Certified internal combustion engine powering an electrical generator, at 420 N. Burke Street in Visalia.

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. Steve Roeder of Permit Services at (661) 392-5615.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM:sr

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 Engine

Facility Name:	Visalia Emergency Communications Ctr	Date:	3/13/17
Mailing Address:	315 E. Acequia Ave Visalia, CA 93291	Engineer:	Steve Roeder
Contact Person:	Mike Porter	Lead Engineer:	Steve Leonard
Telephone:	(559) 713-4412		
Application #:	S-8973-1-0		
Project #:	S-1170426		
Complete:	2/23/17		



I. Proposal

Visalia Emergency Communications Center has proposed to install a 1,214 hp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator.

This project triggers the Public Notification requirements of Rule 2201 (see below) for NO_x emissions greater than 100 lb/day. Therefore, a 30-day public noticing period will be satisfied prior to the issuance of the ATC.

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 (8/18/13)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
17 CCR 93115 - Airborne Toxic Control Measure (ATCM) for Stationary CI Engines
California Environmental Quality Act (CEQA)
Public Resources Code 21000-21177: CEQA
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387:
CEQA Guidelines

III. Project Location

The equipment will be located at 420 N. Burke Street in Visalia.

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

IV. Process Description

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

V. Equipment Listing

S-8973: 1,214 HP TIER-2 CERTIFIED DIESEL-FIRED CATERPILLAR MODEL C27
INTERNAL COMBUSTION ENGINE POWERING AN ELECTRICAL
GENERATOR

VI. Emission Control Technology Evaluation

The applicant has proposed to install a Tier-2 certified diesel-fired IC engine, of greater than 750 hp, and is fired on very low-sulfur diesel fuel.

The proposed engine meets the latest Tier certification requirements; therefore, the engine meets the latest ARB/EPA emissions standards for diesel particulate matter, hydrocarbons, nitrogen oxides, and CO (see Engine Data Sheet in Appendix C).

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

VII. General Calculations

A. Assumptions

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

B. Emission Factors

The emission factors are presented in the following table.

Emission Factors			
NO _x	5.18	g/hp·hr	ARB/EPA Certification
SO _x	0.0051	g/hp·hr	Mass Balance Equation Below
PM ₁₀	0.02	g/hp·hr	ARB/EPA Certification
CO	0.23	g/hp·hr	ARB/EPA Certification
VOC	0.03	g/hp·hr	ARB/EPA Certification

$$\frac{0.000015 \text{ lb} \cdot \text{S}}{\text{lb} \cdot \text{fuel}} \times \frac{7.1 \text{ lb fuel}}{\text{gallon}} \times \frac{64 \text{ lb SO}_x}{32 \text{ lb} \cdot \text{S}} \times \frac{1 \text{ gallon}}{137,000 \text{ Btu}} \times \frac{1 \text{ hp}_{in}}{0.35 \text{ hp}_{out}} \times \frac{2,542.5 \text{ Btu}}{\text{hp} \cdot \text{hr}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.0051 \frac{\text{g} \cdot \text{SO}_x}{\text{hp} \cdot \text{hr}}$$

C. Calculations

1. Pre-Project Emissions (PE1)

Since this is a new emissions unit, PE1 = 0.

2. Post-Project PE (PE2)

The daily and annual PE are calculated as follows:

Daily PE2										
NO _x	5.18	g/hp·hr x	1,214	hp x	24	hr/day ÷	454	g/lb=	332.4	lb/day
SO _x	0.0051	g/hp·hr x	1,214	hp x	24	hr/day ÷	454	g/lb=	0.3	lb/day
PM ₁₀	0.02	g/hp·hr x	1,214	hp x	24	hr/day ÷	454	g/lb=	1.3	lb/day
CO	0.23	g/hp·hr x	1,214	hp x	24	hr/day ÷	454	g/lb=	14.8	lb/day
VOC	0.03	g/hp·hr x	1,214	hp x	24	hr/day ÷	454	g/lb=	1.9	lb/day

Annual PE2										
NO _x	5.18	g/hp·hr x	1,214	hp x	50	hr/yr ÷	454	g/lb=	693	lb/yr
SO _x	0.0051	g/hp·hr x	1,214	hp x	50	hr/yr ÷	454	g/lb=	1	lb/yr
PM ₁₀	0.02	g/hp·hr x	1,214	hp x	50	hr/yr ÷	454	g/lb=	3	lb/yr
CO	0.23	g/hp·hr x	1,214	hp x	50	hr/yr ÷	454	g/lb=	31	lb/yr
VOC	0.03	g/hp·hr x	1,214	hp x	50	hr/yr ÷	454	g/lb=	4	lb/yr

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

The SSPE1 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

Since this is a new facility, the SSPE1 is zero for all pollutants.

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

The SSPE2 is the PE from all units with valid ATCs or PTOs, except for emissions units proposed to be shut down as part of the Stationary Project, at the Stationary Source and the quantity of 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.

The SSPE2 is presented in the following table.

SSPE2 (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
S-8973-1-0	693	1	3	31	4
SSPE2	693	1	3	31	4

5. Major Source Determination

Rule 2201 Major Source Determination

A Major Source is a stationary source with an SSPE2 equal to or exceeding one or more of the following threshold values.

Major Source Determination					
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Major Source Threshold (lb/yr)	Existing Major Source?	Becoming a Major Source?
NO _x	0	693	20,000	No	No
SO _x	0	1	140,000	No	No
PM ₁₀	0	3	140,000	No	No
CO	0	31	200,000	No	No
VOC	0	4	20,000	No	No

As seen in the table above, the facility is not an existing Major Source and is not becoming a Major Source as a result of this project.

Rule 2410 Major Source Determination

The facility is not an existing major source for PSD for at least one pollutant. Therefore the facility is not an existing major source for PSD.

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,

Since this is a new emissions unit, BE = PE1 = 0 for all criteria pollutants.

7. SB 288 Major Modification

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

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

8. Federal Major Modification

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

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

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

The project potential to emit, by itself, will not exceed any PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is used to complete the emission profile screen for the District's PAS database. The QNEC for each pollutant is calculated as follows and posted in the table below.

$$QNEC = \frac{(PE_2 - PE_1) \frac{lb}{yr}}{4 \frac{quarters}{yr}}$$

QNEC				
Unit	Pollutant	PE1 (lb/yr)	PE2 (lb/yr)	QNEC (lb/qtr)
S-8973-1-0	NO _x	0	693	173
	SO _x	0	1	0
	PM ₁₀	0	3	1
	CO	0	31	8
	VOC	0	4	1

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

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

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

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

As shown in the following table, BACT is triggered for NO_x emissions only.

New Emissions Unit BACT Applicability				
Pollutant	Daily Emissions (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?
NO _x	332.4	> 2.0	n/a	Yes
SO _x	0.3	> 2.0	n/a	No
PM ₁₀	1.3	> 2.0	n/a	No
CO	14.8	> 2.0 and SSPE2 ≥ 200,000 lb/yr	31	No
VOC	1.9	> 2.0	n/a	No

2. BACT Guideline

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

NO_x: Tier-2 Certification

B. Offsets

Since emergency IC engines are exempt from the offset requirements of Rule 2201, per Section 4.6.2, offsets are not required for this engine, and no offset calculations are required.

C. Public Notification

1. Applicability

Public notification is required for:

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

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

Since this project is neither of these, public notification is not required for this purpose.

b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant

Since no emissions units produce greater than 100 lb/day, public notification is not required for this purpose.

c. Any project which results in the offset thresholds being surpassed

Since none of the offset thresholds are exceeded during this project, public notification is not required for this purpose.

d. Any project with an SSIPE >20,000 lb/year for any pollutant

Since the SSIPE is less than 20,000 lb/year, public notification is not required for this purpose.

e. Any project which results in a Title V significant permit modification

Since this project is not a Title V significant permit modification, public notification is not required for this purpose.

2. Public Notice Action

Since none of the noticing requirements listed above are triggered, public notification is not required for this project.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.16 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.16.1 and 3.16.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis.

The following conditions are listed on the permit to ensure compliance:

- {4771} Emissions from this IC engine shall not exceed any of the following limits: 5.18 g-NO_x/bhp-hr, 0.23 g-CO/bhp-hr, or 0.03 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- {4772} Emissions from this IC engine shall not exceed 0.02 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.

Rule 2520 Federally Mandated Operating Permits

Since this facility's potential to emit does not exceed any major source thresholds of Rule 2201, this facility is not a major source, and Rule 2520 does not apply.

Rule 4001 New Source Performance Standards (NSPS)

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

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 Emissions (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 to ensure compliance:

- {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. The following condition is listed on the permit to ensure compliance:

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources (dated 3/2/01) specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite. Therefore, a risk management review (RMR) was performed for this project. The RMR results are summarized in the following table, and can be seen in detail in Appendix D.

RMR Summary						
Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required?	Special Permit Requirements?
Diesel-Fired IC Engine (Unit 1-0)	N/A ¹	N/A ²	0.00	7.94 x 10 ⁻⁸	No	Yes
Project Totals	N/A ¹	N/A ²	0.00	7.94 x 10 ⁻⁸		
Facility Totals	N/A ¹	N/A ²	0.00	7.94 x 10 ⁻⁸		

BACT for toxic emission control (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.

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

Unit # 1-0

1. The PM₁₀ emissions rate shall not exceed 0.02 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.

Compliance with the District's Risk Management Policy is expected.

Rule 4201 Particulate Matter Concentration

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

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

The new engine has a PM₁₀ emission factor less than 0.4 g/bhp-hr. The following condition is listed on the permit to ensure compliance.

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

Rule 4701 Internal Combustion Engines - Phase 1

The purpose of this rule is to limit the emissions of nitrogen oxides (NOx), 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 engine(s) 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 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 is listed on the permit:
 - 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 is listed on the permit:
 - {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 is listed on the permit:
 - {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 is listed on the permit:

- {4257} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII]
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 are listed on the permit:
- {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 are listed on the permit:
- {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

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

$$\frac{0.000015 \text{ lb} \cdot \text{S}}{\text{lb} \cdot \text{fuel}} \times \frac{7.1 \text{ lb fuel}}{\text{gallon}} \times \frac{64 \text{ lb SO}_2}{32 \text{ lb} \cdot \text{S}} \times \frac{1 \text{ MMBtu}}{9,051 \text{ scf}} \times \frac{1 \text{ gallon}}{0.137 \text{ MMBtu}} \times \frac{1 \text{ lb} \cdot \text{mole}}{64 \text{ lb} \cdot \text{SO}_2} \times \frac{10.73 \text{ psi} \cdot \text{scf}}{\text{lb} \cdot \text{mole} \cdot \text{°R}} \times \frac{520 \text{°R}}{14.7 \text{ psi}} \times \frac{10^6 \text{ parts}}{\text{million}} = 1.0 \text{ ppmv SO}_2$$

Since 1.0 ppmv is ≤ 2,000 ppmv, this engine is expected to comply with Rule 4801. Therefore, the following condition is listed on the permit 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 engine 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 new engines (those installed after 1/1/05):

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 engine(s) 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	The following condition will be included on the permit:

<p>purposes.</p>	<ul style="list-style-type: none"> • This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District 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 this engine is 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 permit:</p> <ul style="list-style-type: none"> • {4257} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII]
<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 San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the project qualifies for ministerial approval under the District's Guideline for Expedited Application Review (GEAR). Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Compliance with applicable rules is expected. Issue ATC S-8973-1-0 subject to the permit conditions listed on the attached draft ATC.

X. Billing Information

Billing Schedule			
Permit Number	Fee Schedule	Fee Description	Fee Amount
S-8973-1-0	3020-10-F	1,214 bhp IC engine	\$820

Appendixes

- A. Draft ATC
- B. BACT Guideline and BACT Analysis
- C. Emissions Data Sheet
- D. RMR Summary
- E. Emissions Profile

Appendix A
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-8973-1-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: VISALIA EMERGENCY COMMUNICATIONS CENTER

MAILING ADDRESS: 315 E ACEQUIA AVE
VISALIA, CA 93291

LOCATION: 420 N BURKE STREET
VISALIA, CA 93291

EQUIPMENT DESCRIPTION:

1,214 HP TIER-2 CERTIFIED DIESEL-FIRED CATERPILLAR MODEL C27 INTERNAL COMBUSTION ENGINE
POWERING AN ELECTRICAL GENERATOR

CONDITIONS

1. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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. {4257} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII]
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. {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]
8. {4262} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII]

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-8973-1-0: Mar 13 2017 4:45PM - ROEDERS Joint Inspection NOT Required

9. {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]
10. {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]
11. Emissions from this IC engine shall not exceed any of the following limits: 5.18 g-NOx/bhp-hr, 0.23 g-CO/bhp-hr, or 0.03 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart III]
12. Emissions from this IC engine shall not exceed 0.02 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart III]
13. {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]
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. {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

Best Available Control Technology (BACT) Guideline 3.1.1
Last Update: 7/10/2009
Emergency Diesel IC Engine

Pollutant	Achieved In Practice or in the SIP	Technologically Feasible	Alternate Basic Equipment
CO	Latest EPA Tier Certification level for applicable horsepower range*		
NO _x	Latest EPA Tier Certification level for applicable horsepower range*		
PM ₁₀	0.15 g/bhp-hr		
SO _x	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.

Top Down BACT Analysis for the Emergency IC Engine

BACT Guideline 3.1.1 (9/10/13) applies to emergency diesel IC engines. In accordance with the BACT policy, information from that guideline will be utilized without further analysis.

1. BACT Analysis for NO_x 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 < 750 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

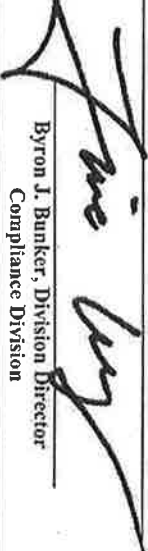
BACT will include the use of an EPA Tier-2 certified engine. The applicant is proposing such a unit. Therefore, BACT is satisfied.

Appendix C
Emissions Data Sheet



**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: Caterpillar Inc. (U.S. Manufacturer or Importer) Certificate Number: GCPXL27.0NZS-006	Effective Date: <u>07/10/2015</u> Expiration Date: <u>12/31/2016</u>	 Byron J. Bunker, Division Director Compliance Division	Issue Date: <u>07/10/2015</u> Revision Date: <u>N/A</u>
----------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------

Model Year: 2016 Manufacturer Type: Original Engine Manufacturer Engine Family: GCPXL27.0NZS	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: Electronic Control, 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 HRA Summary Risk Management Review

To: Steve Roeder – Permit Services
 From: Georgia Stewart – Technical Services
 Date: February 28, 2017
 Facility Name: Visalia Emergency Communications Center
 Location: 420 N Burke St, Visalia, CA
 Application #(s): S-8973-1-0
 Project #: S-1170426

A. RMR SUMMARY

RMR Summary						
Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required?	Special Permit Requirements?
Diesel-Fired IC Engine (Unit 1-0)	N/A ¹	N/A ²	0.00	7.94E-08	No	Yes
Project Totals	N/A ¹	N/A ²	0.00	7.94E-08		
Facility Totals	N/A ¹	N/A ²	0.00	7.94E-08		

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 # 1-0

1. The PM10 emissions rate shall not exceed 0.02 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 16, 2017, to perform an Ambient Air Quality Analysis and a Risk Management Review for a proposed installation of a 1,214 bhp diesel-fired emergency IC engine powering an electrical generator.

II. Analysis

Toxic emissions for this proposed unit were calculated by the processing engineer for Diesel Particulate Matter and input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). A 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 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 1-0			
Source Type	Point	Location Type	Urban
Stack Height (m)	3.96	Closest Receptor (m)	160
Stack Diameter. (m)	0.305	Type of Receptor	Business
Stack Exit Velocity (m/s)	18.776	Max Hours per Year	50
Stack Exit Temp. (°K)	784.11	Fuel Type	Diesel
Diesel Process Rates (PM ₁₀ lb/hr)	0.05	Diesel Process Rates (PM ₁₀ lb/yr)	3

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	693	0	1	0	31	0	3

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*

	Background Site	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	Visalia – N Church (2015)	NA ¹	X	NA ¹	X	X
NO _x	Visalia – N Church (2015)	NA ¹	X	X	X	Pass
SO _x	Fresno – Garland (2015)	NA ¹	NA ¹	X	NA ¹	Pass
PM ₁₀	Visalia – N Church (2015)	X	X	X	NA ¹	Pass ²
PM _{2.5}	Visalia – N Church (2015)	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.