APR 05 2018

Michael Martin
Amteck
2421 Fortune Drive - suite 150
Lexington, KY 40509

Re: Notice of Preliminary Decision – Authorities to Construct
Facility Number: N-9470
Project Number: N-1181041

Dear Mr. Martin:

Enclosed for your review and comment is the District’s analysis of Amteck’s application for Authorities to Construct for the installation of five 762 bhp diesel-fired emergency engines each powering an electrical generator located at 24201 Mountain House Parkway, Tracy, CA.

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

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Fred Cruz of Permit Services at (209) 557-6456.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:fjc

Enclosures

cc: Tung Le, CARB (w/ enclosure) via email
San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Emergency Standby IC Engine

Facility Name: Amteck  Date: March 22, 2018
Mailing Address: 2421 Fortune Drive – Suite 150  Engineer: Fred Cruz
Lexington, KY 40509  
Contact Person: Michael Martin  Lead Engineer: James Harader
Telephone: (859) 255-9546  (859) 221-4427 cell
Email: mmartin@amteck.com
Application Nos: N-9470-1-0, -2-0, -3-0, -4-0 & -5-0
Project No: N-1181041
Deemed Complete: March 19, 2018

I. Proposal:

Amteck submitted Authority to Construct applications to install five diesel-fired emergency engines each powering an electrical generator.

II. Applicable Rules:

Rule 2201  New and Modified Stationary Source Review Rule (2/18/2016)
Rule 2410  Prevention of Significant Deterioration (6/16/2011)
Rule 2520  Federally Mandated Operating Permits (6/21/2001)
Rule 4001  New Source Performance Standards (4/14/1999)
Rule 4101  Visible Emissions (2/17/2005)
Rule 4102  Nuisance (12/17/1992)
Rule 4201  Particulate Matter Concentration (12/17/1992)
Rule 4701  Stationary Internal Combustion Engines – Phase 1 (8/21/2003)
Rule 4702  Stationary Internal Combustion Engines – Phase 2 (11/14/2013)
Rule 4801  Sulfur Compounds (12/17/1992)
CH&SC 41700  Health Risk Assessment
CH&SC 42301.6  School Notice
Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines
California Environmental Quality Act (CEQA)
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines
III. Project Location:

The facility is located at 24201 Mountain House Parkway, Tracy, CA. The project is not located within 1,000 feet of a K-12 school. Therefore, the school notification requirements of CH&SC Section 42301.6 are not required.

IV. Process Description:

Each 762 bhp Caterpillar diesel-fired emergency engine powers an electrical generator.

V. Equipment Listing:

N-9470-1-0:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED) POWERING AN ELECTRICAL GENERATOR (ENGINE #1)

N-9470-2-0:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED) POWERING AN ELECTRICAL GENERATOR (ENGINE #2)

N-9470-3-0:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED) POWERING AN ELECTRICAL GENERATOR (ENGINE #3)

N-9470-4-0:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED) POWERING AN ELECTRICAL GENERATOR (ENGINE #4)

N-9470-5-0:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED) POWERING AN ELECTRICAL GENERATOR (ENGINE #5)

VI. Emission Control Technology Evaluation:

The applicant has proposed to install five Tier 2 certified diesel-fired IC engines that are fired on very low-sulfur diesel fuel.

The proposed engines each meet the latest Tier Certification requirements for emergency standby engines. Therefore, these engines meet the latest ARB/EPA emissions standards for diesel particulate matter, hydrocarbons, nitrogen oxides, and carbon monoxide (see Appendix C for a copy of the emissions data sheet and/or the ARB/EPA executive order).

The use of very low-sulfur diesel fuel (0.0015% by weight sulfur maximum) reduces SOx emissions by over 99% from standard diesel fuel.
VII. Emission Calculations:

A. Assumptions:
- Operating schedule: 24 hours/day, 50 hours/year
- Density of diesel fuel: 7.1 lb/gal
- EPA F-factor: 9051 dscf/MMBtu (corrected to 60° F)
- PM$_{10}$ fraction of diesel exhaust is 96% (Reference - CARB, 1988)
- Fuel heating value: 137,000 Btu/gal
- BHP to Btu/hr conversion: 2542.5 Btu/hp-hr
- Thermal efficiency of engine commonly ≈ 35%
- Fuel rate: 31.2 gal/hr @ 100% load

B. Emission Factors:

The engine manufacturer supplied the emissions factor for NO$_x$ and VOC emissions as a combined emission factor. Each engine has a certified NO$_x$ + VOC emissions of 3.73 g/bhp-hr (5.02 g/kW-hr). It will be assumed the NO$_x$ + VOC emission factor is split 95% NO$_x$ and 5% VOC (per the Carl Moyer program).

The applicant supplied the combined NO$_x$ + VOC emissions factor as 3.73 g/bhp-hr. Therefore, the NO$_x$ and VOC emissions factors are calculated as follows:

\[
\text{NO}_x \text{ g/bhp-hr} = 3.73 \text{ g/bhp-hr} \times 0.95 \\
\text{NO}_x = 3.54 \text{ g/bhp-hr}
\]

\[
\text{VOC (g/bhp-hr)} = 3.73 \text{ g/bhp-hr} \times 0.05 \\
\text{VOC} = 0.19 \text{ g/bhp-hr}
\]

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (g/bhp-hr)</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO$_x$</td>
<td>3.54</td>
<td>Engine manufacturer</td>
</tr>
<tr>
<td>CO</td>
<td>1.06</td>
<td>Engine manufacturer</td>
</tr>
<tr>
<td>VOC</td>
<td>0.19</td>
<td>Engine manufacturer</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.05</td>
<td>Engine manufacturer</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>0.005</td>
<td>See calculation below</td>
</tr>
</tbody>
</table>

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

\[
\frac{0.000015 \text{ lb} - S}{\text{ lb - fuel}} \times \frac{7.1 \text{ lb - fuel}}{\text{ galton}} \times \frac{2 \text{ lb} - \text{SO}_2}{1 \text{ gal}} \times \frac{1 \text{ Btu input}}{1 \text{ lb} - S} \times \frac{2,542.5 \text{ Btu}}{137,000 \text{ Btu}} \times \frac{0.35 \text{ bhp out}}{\text{ bhp - hr}} \times \frac{1 \text{ lb}}{1 \text{ bhp - hr}} = 0.0051 \frac{g - \text{SO}_x}{\text{bhp - hr}}
\]
C. Calculations:

1. Pre-Project Emissions (PE1)

These emergency engines are considered as new emission units and PE1 will equal zero for all pollutants.

2. Post Project PE (PE2)

The potential to emit emissions from each emergency IC engine is based on the maximum operating capacity of the engine for 24 hours per day. The following calculation for NO\textsubscript{x} emissions is representative of emission calculations for all pollutants. Annual emissions are calculated using 50 hours per year for non-emergency operation for each engine.

\[
\text{NO}_\text{x} = 3.54 \text{ g/hp-hr} \times 762 \text{ hp} \times \frac{1}{453.6} \text{ g}
\]

\[
\text{NO}_\text{x} = 5.95 \text{ lb/hr}, 142.7 \text{ lb/day, 297 lb/yr}
\]

\[
\text{CO} = 1.78 \text{ lb/hr}, 42.7 \text{ lb/day, 89 lb/yr}
\]

\[
\text{VOC} = 0.32 \text{ lb/hr}, 7.7 \text{ lb/day, 16 lb/yr}
\]

\[
\text{PM}_{10} = 0.08 \text{ lb/hr}, 2.0 \text{ lb/day, 4 lb/yr}
\]

\[
\text{SO}_\text{x} = 0.008 \text{ lb/hr}, 0.2 \text{ lb/day, 0.4 lb/yr}
\]

<table>
<thead>
<tr>
<th></th>
<th>NO\textsubscript{x}</th>
<th>CO</th>
<th>VOC</th>
<th>PM\textsubscript{10}</th>
<th>SO\textsubscript{x}</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daily PE</td>
<td>142.7</td>
<td>42.7</td>
<td>7.7</td>
<td>2.0</td>
<td>0.2</td>
</tr>
<tr>
<td>Annual PE</td>
<td>297</td>
<td>89</td>
<td>16</td>
<td>4</td>
<td>0</td>
</tr>
</tbody>
</table>

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

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

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

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid ATCs or PTOs, except for emissions units proposed to be shut down as part of the Stationary Project, at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been phased out since September 19, 1991 for Actual Emissions Reductions. The emissions from these units are considered to be zero for all pollutants.

---

\textsuperscript{1} Per District Policy APR 1105, Use of Significant Figures, annual emissions less than 0.5 lbs are set to zero.
Emissions Reductions that have occurred at the source, and which have not been used on-site.

<table>
<thead>
<tr>
<th>Permit No</th>
<th>NOx</th>
<th>CO</th>
<th>VOC</th>
<th>PM₁₀</th>
<th>SOx</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-9470-1-0</td>
<td>297</td>
<td>89</td>
<td>16</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>(ATC)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-9470-2-0</td>
<td>297</td>
<td>89</td>
<td>16</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>(ATC)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-9470-3-0</td>
<td>297</td>
<td>89</td>
<td>16</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>(ATC)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-9470-4-0</td>
<td>297</td>
<td>89</td>
<td>16</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>(ATC)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-9470-5-0</td>
<td>297</td>
<td>89</td>
<td>16</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>(ATC)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ERC</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>1,485</td>
<td>445</td>
<td>80</td>
<td>20</td>
<td>0</td>
</tr>
</tbody>
</table>

5. Major Source Determination:

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, “for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.” This facility does not have ERCs, which have been banked at the source; therefore, SSPE2 does not have to be adjusted.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>SSPE1 (lb/yr)</th>
<th>SSPE2 (lb/yr)</th>
<th>Major Source Threshold (lb/yr)</th>
<th>Existing Major Source?</th>
<th>Becoming a Major Source?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOₓ</td>
<td>0</td>
<td>1,485</td>
<td>20,000</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>SOₓ</td>
<td>0</td>
<td>0</td>
<td>140,000</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>0</td>
<td>20</td>
<td>140,000</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>0</td>
<td>445</td>
<td>200,000</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>0</td>
<td>80</td>
<td>20,000</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

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

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b) (1) (I). Therefore, the following PSD Major Source thresholds are applicable.
<table>
<thead>
<tr>
<th>PSD Major Source Determination (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO₂</td>
</tr>
<tr>
<td>------------------</td>
</tr>
<tr>
<td>Estimated Facility PE before Project Increase</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source ? (Y/N)</td>
</tr>
</tbody>
</table>

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


The equipment is considered as a new emissions unit and the baseline emissions will equal zero for all pollutants.

7. SB 288 Major Modification:

The purpose of Major Modification calculations is to determine the following:

A. If Best Available Control Technology (BACT) is triggered for a new or modified emission unit that results in a Major Modification (District Rule 2201, Section 4.1.3); and
B. If a public notification is triggered (District Rule 2201, Section 5.4.1).

Based on the post-project stationary source potential to emit calculations (less onsite Emission Reduction Credit's) in this document, the facility is not a Major Source for any pollutant. Therefore, the proposed project cannot trigger a SB288 modification and no further calculations are required.

8. Federal Major Modification

This facility is not a Major Source for any pollutant. Therefore, this project cannot constitute a Federal Major Modification and no further discussion is required.

9. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District’s PAS emissions profile screen. Detailed QNEC calculations are included in Appendix C.
10. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination:

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀
- Greenhouse gases (GHG): CO₂, N₂O, CH₄, HFCs, PFCs, and SF₆

The first step of this PSD applicability evaluation consists of determining whether the facility is an existing PSD Major Source. This facility is not an existing PSD Major source (See Section VII.C.5 of this document). In the case the facility is NOT an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

Potential to Emit of attainment/unclassified pollutant for New or Modified Emission Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if total potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

<table>
<thead>
<tr>
<th>PSD Major Source Determination: Potential to Emit (tons/yr)</th>
<th>NO₂</th>
<th>VOC</th>
<th>SO₂</th>
<th>CO</th>
<th>PM</th>
<th>PM₁₀</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PE from New and Modified Units</td>
<td>0.74</td>
<td>0.04</td>
<td>0</td>
<td>0.22</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>PSD Major Source threshold</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>New PSD Major Source?</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>

As demonstrated above, because the project has a total potential to emit from all new and modified emission units below the PSD significant emission increase thresholds, this project is not subject to the requirements of Rule 2410 due to a significant emission increase and no further discussion is required.
VII. 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 2.0 pounds per day,
b) The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding 2.0 pounds per day,
c) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding 2.0 pounds per day, and/or
d) Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

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

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

These engines will be considered as new emission units at the time of installation and the daily emissions from each engine are compared to the BACT thresholds in the following table:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Daily Emissions for units -1-0, -2-0, -3-0, -4-0 &amp; -5-0 (lb/day)</th>
<th>BACT Threshold (lb/day)</th>
<th>SSPE2 (lb/yr)</th>
<th>BACT Triggered?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>142.7</td>
<td>&gt; 2.0</td>
<td>N/A</td>
<td>Yes</td>
</tr>
<tr>
<td>SOx</td>
<td>0.2</td>
<td>&gt; 2.0</td>
<td>N/A</td>
<td>No</td>
</tr>
<tr>
<td>PM10</td>
<td>2.0</td>
<td>&gt; 2.0</td>
<td>N/A</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>42.7</td>
<td>&gt; 2.0 and SSPE2 ≥ 200,000 lb/yr</td>
<td>445</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>7.7</td>
<td>&gt; 2.0</td>
<td>N/A</td>
<td>Yes</td>
</tr>
</tbody>
</table>

BACT will be triggered for NOx and VOC emissions for this engine.

b. Relocation of emissions units – PE > 2.0 lb/day

These engines are not being relocated from one stationary source to another stationary source as a result of this project.
c. Modification of emissions units – Adjusted Increase in Permitted Emissions (AIPE) > 2.0 lb/day

These engines are not being modified. Therefore, BACT is not triggered for the modification of emissions units with an AIPE > 2.0 lb/day.

d. Major Modification

This project does not constitute a Major Modification. Therefore, BACT is not triggered for a Major Modification.

2. BACT Guideline:

BACT Guideline 3.1.1, which appears in Appendix D of this report, covers diesel-fired emergency IC engines.

3. Top Down BACT Analysis

Per District Policy APR 1305, Section IX, “A top down BACT analysis shall be performed as a part of the Application Review for each application subject to the BACT requirements pursuant to the District’s NSR Rule for source categories or classes covered in the BACT Clearinghouse, relevant information under each of the following steps may be simply cited from the Clearinghouse without further analysis.”

Pursuant to the attached top down BACT Analysis, which appears in Appendix D of this report, BACT is satisfied with:

NOx, VOC: Use of engine that meets the latest available Tier Certification level for applicable horsepower*

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

B. Offsets:

Since emergency standby IC engines are exempt from the offset requirements of Rule 2201, per Section 4.6.2, offsets are not required for this engine, and offset calculations are not required.

C. Public Notification:

1. Applicability:

Public noticing is required for:
   a. New Major Sources, which is a new facility that also becomes a Major Source,
   b. Major Modifications,
c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
d. Any project which results in the offset thresholds being surpassed, and/or
e. Any project with an SSPE of greater than 20,000 lb/year for any pollutant,
f. Title V Significant Modification.

a. New Major Source

A New Major Source is a new facility, which also becomes a major source. This is a new facility and does not become a Major Source from this project; public noticing is not required for this project for New Major Source purposes.

b. Major Modification

As demonstrated previously in Sections VII.C.7 and VII.C.8, this project does not constitute a Major Modification; therefore, public noticing for Major Modification purposes is not required.

c. PE > 100 lb/day

The Daily PE for each new emissions unit is compared to the daily PE Public Notice Thresholds in the following table:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Daily PE for units -1-0, -2-0, -3-0, -4-0 &amp; -5-0 (lb/day)</th>
<th>Public Notice Threshold (lb/day)</th>
<th>Public Notice Triggered?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>142.7</td>
<td>100</td>
<td>Yes</td>
</tr>
<tr>
<td>SO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>0.2</td>
<td>100</td>
<td>No</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>2.0</td>
<td>100</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>42.7</td>
<td>100</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>7.7</td>
<td>100</td>
<td>No</td>
</tr>
</tbody>
</table>

As detailed in the preceding table, NO<sub>x</sub> emissions from each engine exceed the pollutant public notice threshold and public noticing is required for this project.

d. Offset Threshold

The following table compares the SSPE1 and SSPE2 with the offset thresholds to determine if any offset thresholds have been surpassed.
<table>
<thead>
<tr>
<th>Pollutant</th>
<th>SSPE1 (lb/yr)</th>
<th>SSPE2 (lb/yr)</th>
<th>Offset Threshold (lb/yr)</th>
<th>Public Notice Required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{x}</td>
<td>0</td>
<td>1,485</td>
<td>20,000</td>
<td>No</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
<td>0</td>
<td>0</td>
<td>54,750</td>
<td>No</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>0</td>
<td>20</td>
<td>29,200</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>0</td>
<td>445</td>
<td>200,000</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>0</td>
<td>80</td>
<td>20,000</td>
<td>No</td>
</tr>
</tbody>
</table>

As detailed in the preceding table, there are no offset thresholds surpassed with this project. Therefore, public noticing is not required for this project.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. SSIPE = SSPE2 − SSPE1. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>SSPE2 (lb/yr)</th>
<th>SSPE1 (lb/yr)</th>
<th>SSPIE (lb/yr)</th>
<th>SSIPE Threshold (lb/yr)</th>
<th>Public Notice Required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{x}</td>
<td>1,485</td>
<td>0</td>
<td>1,485</td>
<td>20,000</td>
<td>No</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>20,000</td>
<td>No</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>20</td>
<td>0</td>
<td>20</td>
<td>20,000</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>445</td>
<td>0</td>
<td>445</td>
<td>20,000</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>80</td>
<td>0</td>
<td>80</td>
<td>20,000</td>
<td>No</td>
</tr>
</tbody>
</table>

As detailed in the preceding table, there are no SSIPE thresholds surpassed with this project. Therefore, public noticing is not required for exceeding the SSIPE thresholds.
f. Title V Significant Modification:

This facility is not a Major Source and has not been issued a Title V permit. Therefore, public noticing for a Title V Significant Modification is not required.

2. Public Notice Action

As discussed above, this project results in emissions exceeding the 100-lb/day threshold for each engine. Therefore, public notice is required for this project.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit’s maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT. For this emergency standby IC engine, the DELs are stated in the form of emission factors, the maximum engine horsepower rating, and the maximum operational time of 24 hours per day. Therefore, the following conditions will be listed on each ATC to ensure compliance:

N-9470-1-0, -2-0, -3-0, -4-0 & -5-0:

• {4771} Emissions from this IC engine shall not exceed any of the following limits: 3.54 g-NOx/bhp-hr, 1.06 g-CO/bhp-hr, or 0.19 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]

• {4772} Emissions from this IC engine shall not exceed 0.05 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

Monitoring is not required to demonstrate compliance with Rule 2201.
3. Recordkeeping
Recordkeeping is required to demonstrate compliance with the offset, public notification, and daily emission limit requirements of Rule 2201. As required by District Rule 4702, Stationary Internal Combustion Engines - Phase 2, this IC engine is subject to recordkeeping requirements. Recordkeeping requirements, in accordance with District Rule 4702, will be discussed in Section VIII, District Rule 4702, of this evaluation.

4. Reporting
Reporting is not 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 E of this document for the AAQA summary sheet.

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

The proposed location is in a non-attainment area for the state’s PM10 as well as federal and state PM2.5 thresholds. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for PM10 and PM2.5.

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 III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

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

Rule 4002 National Emission Standards for Hazardous Air Pollutants


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

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

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources (dated 3/2/01) specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Technical Services performed a Risk Management Review for the installation of five 762 bhp diesel-fired emergency IC engines each powering an electric generator. (See RMR Summary in Appendix D).

Toxic emissions for this proposed unit were calculated and provided by processing engineer for diesel particulate matter, 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. 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 2004-2008 from the Tracy area to determine the dispersion factors 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.
<table>
<thead>
<tr>
<th>RMR Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Units</strong></td>
</tr>
<tr>
<td>Unit 1-0, 2-0, 3-0, 4-0, 5-0 (762 BHP DICE Each)</td>
</tr>
<tr>
<td>Project Totals</td>
</tr>
<tr>
<td>Facility Totals</td>
</tr>
</tbody>
</table>

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.

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).

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

- **Units N-9470-1-0, -2-0, -3-0, -4-0 & -5-0:**
  1. The PM$_{10}$ emissions rate shall not exceed 0.05 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.

**Rule 4201 Particulate Matter Concentration**

Particulate matter emissions from the engine will be less than or equal to the rule limit of 0.1 grain per cubic foot of gas at dry standard conditions as shown by the following:

$$0.05 \frac{g - PM_{10}}{bhp - hr} \times \frac{1 bhp - hr}{2,542.5 Btu} \times \frac{10^6 Btu}{8,578 dscf} \times \frac{0.35 Btu_{out}}{1 Btu_{in}} \times \frac{15.43 grain}{g} = 0.01 \frac{grain-PM}{dscf}$$

Since 0.03 grain-PM/dscf is ≤ to 0.1 grain per dscf, compliance with Rule 4201 is expected.

Therefore, the following condition will be listed on the ATC 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

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

Rule 4702  Internal Combustion Engines – Phase 2

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

<table>
<thead>
<tr>
<th>District Rule 4702 Requirements Emergency Standby IC Engines</th>
<th>Proposed Method of Compliance with District Rule 4702 Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operation of emergency standby engines is limited to 100 hours or less per calendar year for non-emergency purposes, verified by the use of a non-resettable elapsed operating time meter.</td>
<td>The Air Toxic Control Measure for Stationary Compression Ignition Engines (Stationary ATCM) limits these engines for maintenance and testing purposes to 50 hours/year. Thus, compliance is expected.</td>
</tr>
</tbody>
</table>
| 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 each 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 Rules 4701 and 4702]  
- {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rules 4701 and 4702] |
| The owner/operator must monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier. | The following condition will be included on the permit:  
- {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 Rules 4701 and 4702] |
Records of the total hours of operation of the emergency standby engine, type of fuel used, purpose for operating the engine, all hours of non-emergency and emergency operation, and support documentation must be maintained. All records shall be retained for a period of at least five years, shall be readily available, and be made available to the APCO upon request.

<table>
<thead>
<tr>
<th>The following conditions will be included on the permit:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• {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]</td>
</tr>
<tr>
<td>• The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]</td>
</tr>
<tr>
<td>• {3475} All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 4701 and 4702 and 17 CCR 93115]</td>
</tr>
</tbody>
</table>

### Rule 4801  Sulfur Compounds

Rule 4801 requires that sulfur compound emissions (as SO$_2$) shall not exceed 0.2% by volume. Using the ideal gas equation, the sulfur compound emissions are calculated as follows:

\[
\text{Volume } \text{SO}_2 = \frac{(n \times R \times T)}{P} \times \text{P}
\]

\[
n = \text{moles SO}_2
\]

\[
T \text{ (standard temperature)} = 60 \; ^\circ\text{F} \text{ or } 520 \; ^\circ\text{R}
\]

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

\[
\begin{align*}
\frac{0.000015 \text{ lb}}{\text{S}} \times 7.1 \text{ lb} & \times \frac{64 \text{ lb}}{\text{SO}_2} \times \frac{1 \text{ MMBtu}}{9,051 \text{ scf}} \times \frac{1 \text{ gal}}{\text{lb}} \times \frac{1 \text{ lb}}{\text{mol}} \times \frac{10.73 \text{ psi}}{\text{R}} \times \frac{1 \text{ MMBtu}}{520 \text{R}} \times 1 \text{,000,000} = 1.0 \text{ ppmv}
\end{align*}
\]

Since 1.0 ppmv is ≤ 2,000 ppmv, each engine is expected to comply with Rule 4801. Therefore, the following condition will be listed on the ATC to ensure compliance:
- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]

**California Health & Safety Code 42301.6 (School Notice)**

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

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

The following requirements apply to new engines (those installed after 1/1/2005):

<table>
<thead>
<tr>
<th>Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators</th>
<th>Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency engines must be fired on CARB diesel fuel, or an approved alternative diesel fuel.</td>
<td>The applicant has proposed the use of CARB certified diesel fuel. The proposed permit condition, requiring the use of CARB certified diesel fuel, is included on each permit.</td>
</tr>
<tr>
<td>The engine must meet the emission standards in Table 1 of the ATCM for the specific power rating and model year of the proposed engine.</td>
<td>The applicant has proposed the use of an engine that is 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.</td>
</tr>
<tr>
<td>The engine may not be operated more than 50 hours per year for maintenance and testing purposes unless the PM emissions are ( \leq 0.01 ) g/bhp-hr, then the engine is allowed 100 hours per year. Emissions from this engine are certified at 0.05 g/bhp-hr, therefore the engine is allowed 50 hours.</td>
<td>The following conditions will be included on each permit:</td>
</tr>
<tr>
<td>- Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]</td>
<td></td>
</tr>
<tr>
<td>- [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]</td>
<td></td>
</tr>
<tr>
<td>A non-resettable hour meter with a minimum display capability of 9,999 hours</td>
<td>The following condition will be included on the permit:</td>
</tr>
</tbody>
</table>
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.

| {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] |

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.

| The following conditions will be included on each 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 blackouts, 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] |

---

**California Environmental Quality Act (CEQA)**

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001.
The basic purposes of CEQA are to:
- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CEQA Guidelines §15381). The District’s engineering evaluation of the project (this document) demonstrates that compliance with District rules and permit conditions would reduce Stationary Source emissions from the project to levels below the District’s significance thresholds for criteria pollutants. The District has determined that no additional findings are required (CEQA Guidelines §15096(h)).

**Greenhouse Gas (GHG) Significance Determination**

**District is a Responsible Agency**
It is determined that another agency has prepared an environmental review document for the project. The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CEQA Guidelines §15381). As a Responsible Agency, the District is limited to mitigating or avoiding impacts for which it has statutory authority. The District does not have statutory authority for regulating greenhouse gas emissions. The District has determined that the applicant is responsible for implementing greenhouse gas mitigation measures, if any, imposed by the Lead Agency.

**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 prohibitory rules and regulations is expected. Issue the Authority to Construct permit subject to the conditions on the attached permit.

X. Billing Information:

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Fee Schedule</th>
<th>Fee Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-9470-1-0</td>
<td>3020-10-D</td>
<td>762 bhp ($525)</td>
</tr>
<tr>
<td>N-9470-2-0</td>
<td>3020-10-D</td>
<td>762 bhp ($525)</td>
</tr>
<tr>
<td>N-9470-3-0</td>
<td>3020-10-D</td>
<td>762 bhp ($525)</td>
</tr>
<tr>
<td>N-9470-4-0</td>
<td>3020-10-D</td>
<td>762 bhp ($525)</td>
</tr>
<tr>
<td>N-9470-5-0</td>
<td>3020-10-D</td>
<td>762 bhp ($525)</td>
</tr>
</tbody>
</table>

Appendix A - Authority to Construct permits N-9470-1-0, -2-0, -3-0, -4-0 & -5-0
Appendix B - Engine Emissions Certification Sheet
Appendix C - QNEC Calculations
Appendix D - BACT Top-down Analysis
Appendix E - RMR Summary
Appendix A

Authority to Construct Permits
N-9470-1-0, -2-0, -3-0, -4-0 & -5-0
Appendix E

RMR Summary
Appendix B

Engine Emissions Certification Sheet
Appendix C
QNEC Calculations

Quarterly Net Emissions Change (QNEC)

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

\[
\text{QNEC} = \text{PE2} - \text{PE1}, \quad \text{where:}
\]

- QNEC = Quarterly Net Emissions Change for each emissions unit, \( \text{lb/qtr} \)
- PE2 = Post-Project Potential to Emit for each emissions unit, \( \text{lb/qtr} \)
- PE1 = Pre-Project Potential to Emit for each emissions unit, \( \text{lb/qtr} \)

Using the emission calculations in this evaluation, \( \text{PE2}_{\text{quarterly}} \) and \( \text{BE}_{\text{quarterly}} \) can be calculated as follows:

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

\[
\begin{align*}
\Delta \text{PE}_{\text{NOx}} &= 297 \text{ lb-NOx/year} - 0 \text{ lb-NOx/year} = 297 \text{ lb/year} \\
\Delta \text{PE}_{\text{CO}} &= 89 \text{ lb-CO/year} - 0 \text{ lb-CO/year} = 89 \text{ lb/year} \\
\Delta \text{PE}_{\text{VOC}} &= 16 \text{ lb-VOC/year} - 0 \text{ lb-VOC/year} = 16 \text{ lb/year} \\
\Delta \text{PE}_{\text{PM10}} &= 4 \text{ lb-PM10/year} - 0 \text{ lb-PM10/year} = 4 \text{ lb/year} \\
\Delta \text{PE}_{\text{SOx}} &= 0 \text{ lb-SOx/year} - 0 \text{ lb-SOx/year} = 0 \text{ lb/year}
\end{align*}
\]

<table>
<thead>
<tr>
<th></th>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
<th>Quarter 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>74</td>
<td>74</td>
<td>74</td>
<td>75</td>
</tr>
<tr>
<td>CO</td>
<td>22</td>
<td>22</td>
<td>22</td>
<td>23</td>
</tr>
<tr>
<td>VOC</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>PM10</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>SOx</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Appendix D

BACT Guideline and BACT Analysis
# San Joaquin Valley
## Unified Air Pollution Control District

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Achieved in Practice or in the SIP</th>
<th>Technologically Feasible</th>
<th>Alternate Basic Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>Latest EPA Tier Certification level for applicable horsepower range*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NOx</td>
<td>Latest EPA Tier Certification level for applicable horsepower range*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>0.15 g/bhp-hr or the Latest EPA Tier Certification level for applicable horsepower range, whichever is more stringent. (ATCM)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SOx</td>
<td>Very low sulfur diesel fuel (15 ppmw sulfur or less)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td>Latest EPA Tier Certification level for applicable horsepower range*</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Note: The certification requirements are as follows: for emergency engines 50 ≤ bhp < 75 - Tier 4 Interim; for emergency engines 75 ≤ 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 NOx 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 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)

<table>
<thead>
<tr>
<th>Maximum Engine Power</th>
<th>Tier</th>
<th>Model Year(s)</th>
<th>PM</th>
<th>NMHC+NOx</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>50 ≤ HP &lt; 75 (37 ≤ kW &lt; 56)</td>
<td>2</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>5.6 (7.5)</td>
<td>3.7 (5.0)</td>
</tr>
<tr>
<td></td>
<td>4i</td>
<td>2008+</td>
<td></td>
<td>3.5 (4.7)</td>
<td></td>
</tr>
<tr>
<td>75 ≤ HP &lt; 100 (55 ≤ kW &lt; 75)</td>
<td>2</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>5.6 (7.5)</td>
<td>3.7 (5.0)</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>2008+</td>
<td></td>
<td>3.5 (4.7)</td>
<td></td>
</tr>
<tr>
<td>100 ≤ HP &lt; 175 (75 ≤ kW &lt; 130)</td>
<td>3</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>3.0 (4.0)</td>
<td>3.7 (5.0)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2008+</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>175 ≤ HP &lt; 300 (130 ≤ kW &lt; 225)</td>
<td>3</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>3.0 (4.0)</td>
<td>2.6 (3.5)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2008+</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>300 ≤ HP &lt; 600 (225 ≤ kW &lt; 450)</td>
<td>3</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>3.0 (4.0)</td>
<td>2.6 (3.5)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2008+</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>600 ≤ HP &lt; 750 (450 ≤ kW &lt; 560)</td>
<td>3</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>3.0 (4.0)</td>
<td>2.6 (3.5)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2008+</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HP &gt; 750 (kW &gt; 560)</td>
<td>2</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>4.8 (6.4)</td>
<td>2.6 (3.5)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2008+</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 engines are each rated at 762 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

Ranking is not necessary since there is only one control option listed in Step 1.

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

BACT for NOx and VOC will be the use of an EPA Tier 2 certified engine. The applicant is proposing such units. Therefore, BACT will be satisfied.
Appendix A

Authority to Construct Permits
N-9470-1-0, -2-0, -3-0, -4-0 & -5-0
San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: N-9470-1-0
LEGAL OWNER OR OPERATOR: AMTECK
MAILING ADDRESS: 2421 FORTUNE DR STE 150
LEXINGTON, KY 40509
LOCATION: 24201 MOUNTAIN HOUSE PARKWAY
TRACY, CA 95377

EQUIPMENT DESCRIPTION:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED)
POWERING AN ELECTRICAL GENERATOR (ENGINE #1)

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/dcscf 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: 3.54 g-NOx/bhp-hr, 1.06 g-CO/bhp-hr, or 0.19 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]

8. Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications, and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services
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]
San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: N-9470-2-0
LEGAL OWNER OR OPERATOR: AMTECK
MAILING ADDRESS: 2421 FORTUNE DR STE 150
LEXINGTON, KY 40509
LOCATION: 24201 MOUNTAIN HOUSE PARKWAY
TRACY, CA 95377

EQUIPMENT DESCRIPTION:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED)
POWERING AN ELECTRICAL GENERATOR (ENGINE #2)

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: 3.54 g-NOx/bhp-hr, 1.06 g-CO/bhp-hr, or 0.19 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
8. Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director (APCO)

Arnaud Marjolle, Director of Permit Services
Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475
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]

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, 4102, 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]
AUTHORITY TO CONSTRUCT

PERMIT NO: N-9470-3-0
LEGAL OWNER OR OPERATOR: AMTECK
MAILING ADDRESS: 2421 FORTUNE DR STE 150
LEXINGTON, KY 40509

LOCATION: 24201 MOUNTAIN HOUSE PARKWAY
TRACY, CA 95377

EQUIPMENT DESCRIPTION:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED)
POWERING AN ELECTRICAL GENERATOR (ENGINE #3).

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: 3.54 g-NOx/bhp-hr, 1.06 g-CO/bhp-hr, or 0.19 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]

8. Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyad Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475
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]
San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: N-9470-4-0
LEGAL OWNER OR OPERATOR: AMTECK
MAILING ADDRESS: 2421 FORTUNE DR STE 150
LEXINGTON, KY 40509
LOCATION: 24201 MOUNTAIN HOUSE PARKWAY
TRACY, CA 95377

EQUIPMENT DESCRIPTION:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED)
POWERING AN ELECTRICAL GENERATOR (ENGINE #4)

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: 3.54 g-NOx/bhp-hr, 1.06 g-CO/bhp-hr, or 0.19 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
8. Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. THIS IS NOT A PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services
N-9470-4-0, Iss. May 2016, Rev. 04/16/2017, No. C0017-01, PLAN. Joint Inspection NOT Required
Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475
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 931115]

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 931115]

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 931115]

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 931115]

15. {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 931115]

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 931115]
AUTHORITY TO CONSTRUCT

PERMIT NO: N-9470-5-0

LEGAL OWNER OR OPERATOR: AMTECK
MAILING ADDRESS: 2421 FORTUNE DR STE 150 LEXINGTON, KY 40509

LOCATION: 24201 MOUNTAIN HOUSE PARKWAY TRACY, CA 95377

EQUIPMENT DESCRIPTION:
762 BHP CATERPILLAR MODEL 2506C-E15TAGG3 DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED)
POWERING AN ELECTRICAL GENERATOR (ENGINE #5)

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: 3.54 g-NOx/bhp-hr, 1.06 g-CO/bhp-hr, or
0.19 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]

8. Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadreddin, Executive Director / APCO
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 931115]

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 931115]

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 931115]

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]
Appendix B

Engine Emissions Certification Sheet
The measured emissions values provided here are proprietary to Generac and its authorized dealers. This information may only be disseminated upon request, to regulatory governmental bodies for emissions permitting purposes or to specifying organizations as submitted data when expressly required by project specifications, and shall remain confidential and not open to public viewing. This information is not intended for compilation or sales purposes and may not be used as such, nor may it be reproduced without the expressed written permission of Generac Power Systems, Inc. The data provided shall not be meant to include information made public by Generac.

Generator Model: SD/MDS00  
Engine Family: JCPXL15.2NZS  
Engine Model: 2505C-16TAG3  
Rated Engine Power (BHP)*: 762  
Fuel Consumption (gal/hr)*: 31.2  
Aspiration: Turbo/Aftercooled  
Rated RPM: 1800

*Engine Power and Fuel Consumption are declared by the Engine Manufacturer of Record and the U.S. EPA.

Emissions based on engine power of specific Engine Model.  
(These values are actual composite weighted exhaust emissions results over the EPA 5-mode test cycle.)

<table>
<thead>
<tr>
<th></th>
<th>CO</th>
<th>NOx + NMHC</th>
<th>PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grams/kW-hr</td>
<td>1.43</td>
<td>5.02</td>
<td>0.07</td>
</tr>
<tr>
<td>Grams/bhp-hr</td>
<td>1.96</td>
<td>3.73</td>
<td>0.05</td>
</tr>
</tbody>
</table>

* The stated values are actual exhaust emission test measurements obtained from an engine representative of the type described above.
* Values based on 5-mode testing are official data of record as submitted to regulatory agencies for certification purposes. Testing was conducted in accordance with prevailing EPA protocol, which is typically accepted by SCAQMD and other regional authorities.
* No emissions values provided above are to be construed as guarantees of emission levels for any given Generac generator unit.
* Generac Power Systems, Inc. reserves the right to revise this information without prior notice.
* Consult state and local regulatory agencies for specific permitting requirements.
* The emission performance data supplied by the equipment manufacturer is only one element required toward completion of the permitting and installation process. State and local regulations may vary on a case-by-case basis and local agencies must be consulted by the permit application/equipment owner prior to equipment purchase or installation. The data supplied herein by Generac Power Systems cannot be construed as a guarantee of installability of the generating set.
Appendix C
QNEC Calculations

Quarterly Net Emissions Change (QNEC)

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

\[
\text{QNEC} = \text{PE2} - \text{PE1}, \text{ where:}
\]

- \( \text{QNEC} \) = Quarterly Net Emissions Change for each emissions unit, lb/qtr
- \( \text{PE2} \) = Post-Project Potential to Emit for each emissions unit, lb/qtr
- \( \text{PE1} \) = Pre-Project Potential to Emit for each emissions unit, lb/qtr

Using the emission calculations in this evaluation, \( \text{PE2}_{\text{quarterly}} \) and \( \text{BE}_{\text{quarterly}} \) can be calculated as follows:

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

\[
\begin{align*}
\Delta \text{PE}_{\text{NOx}} &= 297 \text{ lb-NOx/year} - 0 \text{ lb-NOx/year} = 297 \text{ lb/year} \\
\Delta \text{PE}_{\text{CO}} &= 89 \text{ lb-CO/year} - 0 \text{ lb-CO/year} = 89 \text{ lb/year} \\
\Delta \text{PE}_{\text{VOC}} &= 16 \text{ lb-VOC/year} - 0 \text{ lb-VOC/year} = 16 \text{ lb/year} \\
\Delta \text{PE}_{\text{PM10}} &= 4 \text{ lb-PM10/year} - 0 \text{ lb-PM10/year} = 4 \text{ lb/year} \\
\Delta \text{PE}_{\text{SOx}} &= 0 \text{ lb-SOx/year} - 0 \text{ lb-SOx/year} = 0 \text{ lb/year}
\end{align*}
\]

<table>
<thead>
<tr>
<th></th>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
<th>Quarter 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>74</td>
<td>74</td>
<td>74</td>
<td>75</td>
</tr>
<tr>
<td>CO</td>
<td>22</td>
<td>22</td>
<td>22</td>
<td>23</td>
</tr>
<tr>
<td>VOC</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>SOx</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Appendix D

BACT Guideline and BACT Analysis
**San Joaquin Valley**  
**Unified Air Pollution Control District**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Achieved in Practice or in the SIP</th>
<th>Technologically Feasible</th>
<th>Alternate Basic Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>Latest EPA Tier Certification level for applicable horsepower range*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NOx</td>
<td>Latest EPA Tier Certification level for applicable horsepower range*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.15 g/bhp-hr or the Latest EPA Tier Certification level for applicable horsepower range, whichever is more stringent. (ATCM)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SOx</td>
<td>Very low sulfur diesel fuel (15 ppmw sulfur or less)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td>Latest EPA Tier Certification level for applicable horsepower range*</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Note: The certification requirements are as follows: for emergency engines 50 ≤ bhp < 75 - Tier 4 Interim; for emergency engines 75 ≤ 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 NOx 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 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>
<thead>
<tr>
<th>Maximum Engine Power</th>
<th>Tier</th>
<th>Model Year(s)</th>
<th>PM</th>
<th>NMHC+NOx</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>50 ≤ HP &lt; 75</td>
<td>2</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>5.6 (7.5)</td>
<td>3.7 (5.0)</td>
</tr>
<tr>
<td>(37 ≤ kW &lt; 56)</td>
<td>4i</td>
<td>2008+</td>
<td>3.5 (4.7)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>75 ≤ HP &lt; 100</td>
<td>2</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>5.6 (7.5)</td>
<td>3.7 (5.0)</td>
</tr>
<tr>
<td>(55 ≤ kW &lt; 75)</td>
<td>3</td>
<td>2008+</td>
<td>3.5 (4.7)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>100 ≤ HP &lt; 175</td>
<td>3</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>3.0 (4.0)</td>
<td>3.7 (5.0)</td>
</tr>
<tr>
<td>(75 ≤ kW &lt; 130)</td>
<td>3</td>
<td>2008+</td>
<td>3.0 (4.0)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>175 ≤ HP &lt; 300</td>
<td>3</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>3.0 (4.0)</td>
<td>2.6 (3.5)</td>
</tr>
<tr>
<td>(130 ≤ kW &lt; 225)</td>
<td>3</td>
<td>2008+</td>
<td>3.0 (4.0)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>300 ≤ HP &lt; 600</td>
<td>3</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>3.0 (4.0)</td>
<td>2.6 (3.5)</td>
</tr>
<tr>
<td>(225 ≤ kW &lt; 450)</td>
<td>3</td>
<td>2008+</td>
<td>3.0 (4.0)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>600 ≤ HP &lt; 750</td>
<td>3</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>3.0 (4.0)</td>
<td>2.6 (3.5)</td>
</tr>
<tr>
<td>(450 ≤ kW &lt; 560)</td>
<td>3</td>
<td>2008+</td>
<td>3.0 (4.0)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>HP &gt; 750</td>
<td>2</td>
<td>2007</td>
<td>0.15 (0.20)</td>
<td>4.8 (6.4)</td>
<td>2.6 (3.5)</td>
</tr>
<tr>
<td>(kW &gt; 560)</td>
<td></td>
<td>2008+</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 engines are each rated at 762 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

Ranking is not necessary since there is only one control option listed in Step 1.

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

BACT for NOx and VOC will be the use of an EPA Tier 2 certified engine. The applicant is proposing such units. Therefore, BACT will be satisfied.
Appendix E

RMR Summary
San Joaquin Valley Air Pollution Control District
Risk Management Review

Date: March 20, 2018
To: Fred Cruz – Permit Services
From: Will Worthley – Technical Services

Facility Name: Amteck
Location: 24201 Mountain House Parkway, Tracy
Application Nos: N-9470-1-0, 2-0, 3-0, 4-0, 5-0
Project No: N-1181041

A. RMR SUMMARY

<table>
<thead>
<tr>
<th>Units</th>
<th>Prioritization Score</th>
<th>Acute Hazard Index</th>
<th>Chronic Hazard Index</th>
<th>Maximum Individual Cancer Risk</th>
<th>T-BACT Required?</th>
<th>Special Permit Requirements?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit 1-0, 2-0, 3-0, 4-0, 5-0 (762 BHP DICE Each)</td>
<td>N/A&lt;sup&gt;1&lt;/sup&gt;</td>
<td>N/A&lt;sup&gt;2&lt;/sup&gt;</td>
<td>0.00</td>
<td>2.41E-07</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Project Totals</td>
<td>N/A&lt;sup&gt;1&lt;/sup&gt;</td>
<td>N/A&lt;sup&gt;2&lt;/sup&gt;</td>
<td>0.00</td>
<td>1.21E-06</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Facility Totals</td>
<td>&gt;1</td>
<td>0.00</td>
<td>0.00</td>
<td>1.21E-06</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

<sup>1</sup> 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.

<sup>2</sup> 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, 2-0, 3-0, 4-0, & 5-0

1. The \( \text{PM}_{10} \) emissions rate shall not exceed 0.05 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 March 15, 2018, to perform a Risk Management Review for a proposed installation of 5 762 bhp Caterpillar model 2506C-E15TAG3 diesel-fired emergency IC engines powering an electric generator.

II. Analysis

Toxic emissions for this proposed unit were calculated and provided by processing engineer for diesel particulate matter, 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. 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 2004-2008 from the Tracy area to determine the dispersion factors 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:

<table>
<thead>
<tr>
<th>Analysis Parameters</th>
<th>Unit 1-0, 2-0, 3-0, 4-0, &amp; 5-0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Type</td>
<td>Point</td>
</tr>
<tr>
<td>Stack Height (m)</td>
<td>2.13</td>
</tr>
<tr>
<td>Stack Diameter (m)</td>
<td>0.13</td>
</tr>
<tr>
<td>Stack Exit Velocity (m/s)</td>
<td>147.34</td>
</tr>
<tr>
<td>Stack Exit Temp. (°K)</td>
<td>823</td>
</tr>
<tr>
<td>PM10 Emission (lb/hr)</td>
<td>0.08</td>
</tr>
</tbody>
</table>

Technical Services performed modeling for criteria pollutants CO, NO\textsubscript{x}, SO\textsubscript{x}, and PM10 with the emission rates below:

<table>
<thead>
<tr>
<th>Unit #</th>
<th>NO\textsubscript{x} (lbs)</th>
<th>SO\textsubscript{x} (lbs)</th>
<th>CO (lbs)</th>
<th>PM\textsubscript{10} (lbs)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hr</td>
<td>Yr</td>
<td>Hr</td>
<td>Yr</td>
</tr>
<tr>
<td>1-0 to 5-0 Each</td>
<td>5.95</td>
<td>297</td>
<td>0.008</td>
<td>0</td>
</tr>
</tbody>
</table>
The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results

<table>
<thead>
<tr>
<th></th>
<th>Background Site</th>
<th>1 Hour</th>
<th>3 Hours</th>
<th>8 Hours</th>
<th>24 Hours</th>
<th>Annual</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>Stockton-Hazelton (2016)</td>
<td>NA¹</td>
<td>X</td>
<td>NA¹</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>NO₂</td>
<td>Tracy-Airport (2016)</td>
<td>NA¹</td>
<td>X</td>
<td>X⁵</td>
<td>X</td>
<td>Pass</td>
</tr>
<tr>
<td>SO₂</td>
<td>Fresno – Garland (2016)</td>
<td>NA¹</td>
<td>NA¹</td>
<td>X</td>
<td>NA¹</td>
<td>Pass²</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Manteca (2016)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>NA¹</td>
<td>Pass²</td>
</tr>
<tr>
<td>PM₂.⁵</td>
<td>Manteca (2016)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>NA¹</td>
<td>Pass²</td>
</tr>
</tbody>
</table>

¹ Results were taken from the attached PSD spreadsheet.
² The 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.
³ The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).
⁴ The court has vacated EPA's PM₂.⁵ SILs. Until such time as new SIL values are approved, the District will use the corresponding PM₁₀ SILs for both PM₁₀ and PM₂.⁵ analyses.

III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk associated with each unit 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.

Attachments

A. RMR request from the project engineer
B. Additional information from the applicant/project engineer
C. Convert
D. Facility Summary
E. AAQA Summary