

March 14, 2022

Terry Benson
CXA La Paloma LLC
7195 Dallas Pkwy
Plano, TX 75024

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: S-9921
Project Number: S-1213653

Dear Mr. Benson:

Enclosed for your review and comment is the District's analysis of CXA La Paloma LLC's application for an Authority to Construct for one 1,829 horsepower Tier 2 certified diesel engine to provide emergency power, at La Paloma Pump Station in Buttonwillow.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice period, the District intends to issue the Authority to Construct. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Homero Ramirez of Permit Services at (661) 392-5616.

Sincerely,



Brian Clements
Director of Permit Services

BC:har

Enclosures

cc: Courtney Graham, CARB (w/ enclosure) via email

Samir Sheikh
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District

Authority to Construct

Application Review

Diesel-Fired Emergency Standby IC Engine

| | | | |
|------------------|-------------------------------------|----------------|-------------------------|
| Facility Name: | CXA La Paloma LLC | Date: | February 10, 2022 |
| Mailing Address: | 7195 Dallas Pkwy Plano, TX 75024 | Engineer: | Homero Ramirez |
| Contact Person: | Terry Benson | Lead Engineer: | Silvana Procopio |
| Telephone: | (661) 762-6002 | | <i>Silvana Procopio</i> |
| E-mail: | tbenson@lapalomagc.com | | 3.03.2022 |
| Application #: | S-9921-1 | | |
| Project #: | S-1213653 | | |
| Deemed Complete: | January 20, 2022 | | |

I. Proposal

CXA La Paloma LLC is proposing to install a 1,829 bhp (intermittent) diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (8/15/19)
Rule 2410 Prevention of Significant Deterioration (6/16/11)
Rule 2520 Federally Mandated Operating Permits (8/15/19)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emission Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4701 Internal Combustion Engines - Phase 1 (8/21/03)
Rule 4702 Internal Combustion Engines (8/19/21)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines
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 equipment will be located at La Paloma Pump Station (at the SE corner of McKittrick Highway and the California Aqueduct) in Buttonwillow, CA.

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

IV. Process Description

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

V. Equipment Listing

S-9921-1-0: 1,829 BHP (INTERMITTENT) CATERPILLAR MODEL C32 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

VI. Emission Control Technology Evaluation

The applicant has proposed to install a Tier 2 certified diesel-fired IC engine that is fired on very low-sulfur diesel fuel.

The proposed engine meets the latest Tier Certification requirements for emergency standby engines; therefore, the engine meets 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).

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

VII. General Calculations

A. Assumptions

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

PM₁₀ fraction of diesel exhaust: 0.96 (CARB, 1988)
Conversion factor: 1.34 bhp/kw

B. Emission Factors

| Emission Factors | | | |
|------------------|---------------------------|----------------------------|-----------------------------|
| Pollutant | Emission Factor (g/kw-hr) | Emission Factor (g/bhp-hr) | Source ¹ |
| NO _x | 5.01 | 3.74 | Engine Manufacturer |
| SO _x | | 0.0051 | Mass Balance Equation Below |
| PM ₁₀ | 0.06 | 0.04 | Engine Manufacturer |
| CO | 0.7 | 0.52 | Engine Manufacturer |
| VOC | 0.10 | 0.07 | Engine Manufacturer |

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

C. Calculations

1. Pre-Project Potential to Emit (PE1)

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

2. Post-Project Potential to Emit (PE2)

The daily and annual PE2 are calculated as follows:

$$\text{Daily PE2 (lb-pollutant/day)} = \text{EF (g-pollutant/bhp-hr)} \times \text{rating (bhp)} \times \text{operation (hr/day)} / 453.6 \text{ g/lb}$$

$$\text{Annual PE2 (lb-pollutant/yr)} = \text{EF (g-pollutant/bhp-hr)} \times \text{rating (bhp)} \times \text{operation (hr/yr)} / 453.6 \text{ g/lb}$$

¹ Engine manufacturer emission data is found in Appendix C.

| Post Project Emissions (PE2) | | | | | | |
|-------------------------------------|------------------------------------|---------------------|--|--|---------------------------|---------------------------|
| Pollutant | Emissions Factor (g/bhp-hr) | Rating (bhp) | Daily Hours of Operation (hr/day) | Annual Hours of Operation (hr/year) | Daily PE2 (lb/day) | Annual PE2 (lb/yr) |
| NO _x | 3.74 | 1,829 | 24 | 50 | 361.9 | 754 |
| SO _x | 0.0051 | 1,829 | 24 | 50 | 0.5 | 1 |
| PM ₁₀ | 0.04 | 1,829 | 24 | 50 | 3.9 | 8 |
| CO | 0.52 | 1,829 | 24 | 50 | 50.3 | 105 |
| VOC | 0.07 | 1,829 | 24 | 50 | 6.8 | 14 |

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

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

Since this is a new facility, there are no valid ATCs, PTOs, or ERCs at the Stationary Source. Therefore, the SSPE1 is equal to zero.

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

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

For this project the change in emissions for the facility is due to the installation of the new emergency standby IC engine. Thus:

| SSPE2 (lb/year) | | | | | |
|------------------------|-----------------------|-----------------------|------------------------|------------|------------|
| Permit Unit | NO_x | SO_x | PM₁₀ | CO | VOC |
| S-9921-1-0 | 754 | 1 | 8 | 105 | 14 |
| SSPE2 | 754 | 1 | 8 | 105 | 14 |

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

| Rule 2201 Major Source Determination (lb/year) | | | | | | |
|---|-----------------------|-----------------------|------------------------|-------------------------|-----------|------------|
| | NO_x | SO_x | PM₁₀ | PM_{2.5} | CO | VOC |
| SSPE1 | 0 | 0 | 0 | 0 | 0 | 0 |
| SSPE2 | 754 | 1 | 8 | 8 | 105 | 14 |
| Major Source Threshold | 20,000 | 140,000 | 140,000 | 140,000 | 200,000 | 20,000 |
| Major Source? | No | No | No | No | No | No |

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

Rule 2410 Major Source Determination:

The facility is not an existing Major Source for PSD for at least one pollutant. Therefore the facility is not an existing Major Source for PSD.

6. Baseline Emissions (BE)

BE = Pre Project Potential to Emit for:

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

otherwise,

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

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

7. SB 288 Major Modification

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

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

8. Federal Major Modification

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

Since this facility is not a Major Source for any pollutants, this project does not constitute a Federal Major Modification.

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

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

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix E.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following²:

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

As discussed in Section I, the facility is proposing to install a new emergency standby IC engine. Additionally, as determined in Sections VII.C.7 and VII.C.8, this project does not result in an SB288 Major Modification or a Federal Major Modification, respectively. Therefore, BACT can only be triggered if the daily emissions exceed 2.0 lb/day for any pollutant.

The daily emissions from the new engine are compared to the BACT threshold levels in the following table:

| New Emissions Unit BACT Applicability | | | | |
|--|--|------------------------------------|----------------------|------------------------|
| Pollutant | Daily Emissions for the new unit (lb/day) | BACT Threshold (lb/day) | SSPE2 (lb/yr) | BACT Triggered? |
| NO _x | 361.9 | > 2.0 | n/a | Yes |
| SO _x | 0.5 | > 2.0 | n/a | No |
| PM ₁₀ | 3.9 | > 2.0 | n/a | Yes |
| CO | 50.3 | > 2.0 and SSPE2 ≥ 200,000 lb/yr | 105 | No |
| VOC | 6.8 | > 2.0 | n/a | Yes |

² Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

As shown above, BACT will be triggered for NO_x, PM₁₀, and VOC emissions from the engine for this project.

2. BACT Guideline

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

3. Top Down BACT Analysis

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

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

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

The facility has proposed to install a 1,829 bhp Tier 2 certified IC engine (with a PM₁₀ emissions rate of 0.04 g/bhp-hr), and using very low sulfur diesel fuel. Therefore, BACT is satisfied for NO_x, VOC, and PM₁₀. (See Appendix B for a discussion of the latest available Tier certification.)

B. Offsets

1. Offset Applicability

Pursuant to Section 4.6.2 of this rule, offsets are not required for emergency IC engines. The engine in this project is an emergency IC engine; therefore, this exemption is applicable to this project.

However, even when there is an applicable exemption, the SSPE2 values are compared to the offset threshold to determine if offsets are triggered. In its PAS database, the District keeps track of facilities where offsets are triggered but an exemption applies. The SSPE2 values are compared to the offset trigger thresholds in the following table:

| Offset Determination (lb/year) | | | | | |
|--------------------------------|--------|--------|------------------|---------|--------|
| | NOx | SOx | PM ₁₀ | CO | VOC |
| SSPE2 | 754 | 1 | 8 | 105 | 14 |
| Offset Thresholds | 20,000 | 54,750 | 29,200 | 200,000 | 20,000 |
| Offsets Triggered? | No | No | No | No | No |

2. Quantity of Offsets Required

As shown in the table above, no offset thresholds are exceeded with this project. Further, as previously stated, the offset exemption from Section 4.6.2 of District Rule 2201 is applicable to this project; therefore, offset calculations are not necessary and offsets are not required.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, SB288 Major Modifications, and Federal Major Modifications

As shown in Sections VII.C.5, VII.C.7, and VII.C.8, this facility is not a new Major Source, not an SB 288 Major Modification, and not a Federal Major Modification, respectively.

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

As calculated in Section VII.C.2, daily emissions for NO_x are greater than 100 lb/day. Therefore, public noticing for PE > 100 lb/day purposes is required.

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

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

| Offset Thresholds | | | | |
|-------------------|-----------------|-----------------|------------------|-------------------------|
| Pollutant | SSPE1 (lb/year) | SSPE2 (lb/year) | Offset Threshold | Public Notice Required? |
| NO _x | 0 | 754 | 20,000 lb/year | No |
| SO _x | 0 | 1 | 54,750 lb/year | No |
| PM ₁₀ | 0 | 8 | 29,200 lb/year | No |
| CO | 0 | 105 | 200,000 lb/year | No |
| VOC | 0 | 14 | 20,000 lb/year | No |

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

- d. Any project with a Stationary Source Project Increase in Permitted Emissions (SSIPE) greater than 20,000 lb/year for any pollutant

For this project, the proposed engine is the only emissions unit that will generate an increase in Potential to Emit. Since the proposed engine emissions are well below 20,000 lb/year for all pollutants (See Section VII.C.2), the SSIPE for this project will be below the public notice threshold.

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

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

2. Public Notice Action

As demonstrated above, this project will require public noticing. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be electronically published on the District's website prior to the issuance of the ATC for this equipment.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. Therefore, the following conditions will be listed on the ATC as a mechanism to ensure compliance:

- {4771} Emissions from this IC engine shall not exceed any of the following limits: 3.74 g-NO_x/bhp-hr, 0.52 g-CO/bhp-hr, or 0.07 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- {4772} Emissions from this IC engine shall not exceed 0.04 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 District Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with District Rule 2201.

3. Recordkeeping

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

4. Reporting

No reporting is required to ensure compliance with District 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 D of this document for the AAQA summary sheet.

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

The proposed location is in a non-attainment area for the state's PM₁₀ as well as federal and state PM_{2.5} thresholds. As shown by the AAQA summary sheet the

proposed equipment will not cause a violation of an air quality standard for PM₁₀ and PM_{2.5}.

Rule 2410 Prevention of Significant Deterioration

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

Rule 2520 Federally Mandated Operating Permits

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

Rule 4001 New Source Performance Standards (NSPS)

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

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

Rule 4002 National Emission Standards for Hazardous Air Pollutants

40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Emissions (RICE)

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

Rule 4101 Visible Emissions

Rule 4101 states that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. Therefore, the following condition will be listed on the ATC as a mechanism 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 as a mechanism to ensure compliance:

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

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than or equal to one. According to the Technical Services Memo for this project (Appendix D), the total facility prioritization score including this project was less than or equal to one. Therefore, no further analysis is required to determine the impact from this project and compliance with the District's Risk Management Policy is expected.

The following conditions will be listed on the ATC as a mechanism to ensure compliance with the RMR:

- {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]
- {4772} Emissions from this IC engine shall not exceed 0.04 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- {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]

Rule 4201 Particulate Matter Concentration

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

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

The new engine has a PM₁₀ emission factor less than 0.4 g/bhp-hr. Therefore, compliance is expected and the following condition will be listed on the ATC as a mechanism to ensure compliance:

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

Rule 4701 Internal Combustion Engines - Phase 1

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

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

Rule 4702 Internal Combustion Engines

Emergency standby engines are subject to District Rule 4702 requirements. Emergency standby engines are defined in Section 3.0 of District Rule 4702 as follows:

3.15 Emergency Standby Engine: an internal combustion engine which operates as a temporary replacement for primary mechanical or electrical power during an unscheduled outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the operator. An engine shall be considered to be an emergency standby engine if it is used only for the following purposes: (1) periodic maintenance, periodic readiness testing, or readiness testing during and after repair work; (2) unscheduled outages, or to supply power while maintenance is performed or repairs are made to the primary power supply; and (3) if it is limited to operate 100 hours or less per calendar year for non-emergency purposes. An engine shall not be considered to be an emergency standby engine if it is used: (1) to reduce

the demand for electrical power when normal electrical power line service has not failed, or (2) to produce power for the utility electrical distribution system, or (3) in conjunction with a voluntary utility demand reduction program or interruptible power contract.

Emergency standby engines cannot be used to reduce the demand for electrical power when normal electrical power line service has not failed, or to produce power for the electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract. The following conditions will be included on the permit:

- {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115]
- {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]

The 100 hour requirement is less stringent than the Air Toxic Control Measure operating limitations for emergency standby engines. Therefore, compliance with the applicable Air Toxic Control Measure requirements ensures compliance with the 100 hour requirement.

Operation of emergency standby engines are limited to 100 hours or less per calendar year for non-emergency purposes. The Air Toxic Control Measure for Stationary Compression Ignition Engines (Stationary ATCM) limits this engine's maintenance and testing to 50 hours/year; therefore, compliance is expected. The following condition will be included on the permit:

- {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]

The following exemption in Section 4.2 of District Rule 4702 applies to emergency standby engines:

4.2 Except for the requirements of Section 5.10 and Section 6.2.3, the requirements of this rule shall not apply to:
4.2.1 An emergency standby engine as defined in Section 3.0 of this rule, and provided that it is operated with a nonresettable elapsed operating time meter. In lieu of a nonresettable time meter, the owner of an emergency engine may use an alternative device, method, or technique, in determining operating time

provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Pursuant to the exemption in Section 4.2, the following requirements of Section 5.10 are applicable to emergency standby engines

Section 5.10 requires the owner to:

5.10.2 Properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier.

5.10.3 Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.

5.10.4 Install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate or Permit-Exempt Equipment Registration condition. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier. The following condition will be included on the permit:

- {4261} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]

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 Rule 4702]

Install and operate a nonresettable elapsed time meter. In lieu of installing a nonresettable elapsed time meter, the operator may use an alternative device, method,

or technique, in determining operating time provided that the alternative is approved by the APCO and EPA and is allowed by Permit-to-Operate condition. The operator shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions. The following condition will be included on the permit:

- {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]

The exemption in Rule 4702 Section 4.2 for emergency standby engines requires the engines to comply with Section 6.2.3, shown below.

6.2.3 An owner claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request. The records shall include, but are not limited to, the following:

6.2.3.1 Total hours of operation,

6.2.3.2 The type of fuel used,

6.2.3.3 The purpose for operating the engine,

6.2.3.4 For emergency standby engines, all hours of non-emergency and emergency operation shall be reported, and

6.2.3.5 Other support documentation necessary to demonstrate claim to the exemption.

Records of the total hours of operation, type of fuel used, purpose for operating the engine, all hours of non-emergency and emergency operation, and other support documentation must be maintained. All records shall be retained for a period of at least five years, shall be readily available, and be made available to the APCO upon request. The following conditions will be included on the permit:

- {3496} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]

- {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
- {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

Rule 4801 Sulfur Compounds

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

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

n = moles SO₂

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

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

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

Since 1.0 ppmv is ≤ 2,000 ppmv, this engine is expected to comply with Rule 4801. Therefore, the following condition will be listed on the ATC as a mechanism to ensure compliance:

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

California Health & Safety Code 42301.6 (School Notice)

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

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

The following requirements apply to new engines (those installed after 1/1/05):

| <p>Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators</p> | <p>Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements</p> |
|---|--|
| <p>Emergency engine(s) must be fired on CARB diesel fuel, or an approved alternative diesel fuel.</p> | <p>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 the permit.</p> <ul style="list-style-type: none"> • {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] |
| <p>The engine(s) must meet the emission standards in Table 1 of the ATCM for the specific power rating and model year of the proposed engine.</p> | <p>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.</p> |
| <p>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 0.04 g/bhp-hr, therefore the engine is allowed 50 hours.</p> | <p>The following conditions will be included on the permit:</p> <ul style="list-style-type: none"> • {4772} Emissions from this IC engine shall not exceed 0.04 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115] • {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] |
| <p>Engines, with a PM10 emissions rate greater than 0.01 g/bhp-hr and located at schools, may not be operated for maintenance and testing whenever there is a school sponsored activity on the grounds. Additionally, engines located within 500 feet of school grounds may not be operated for maintenance and testing between 7:30 AM and 3:30 PM</p> | <p>The District has verified that this engine is not located within 500' of a school.</p> |

| | |
|---|--|
| <p>A non-resettable hour meter with a minimum display capability of 9,999 hours shall be installed upon engine installation, or by no later than January 1, 2005, on all engines subject to all or part of the requirements of sections 93115.6, 93115.7, or 93115.8(a) unless the District determines on a case-by-case basis that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history.</p> | <p>The following condition will be included on the permit:</p> <ul style="list-style-type: none"> • {4749} This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115] |
| <p>An owner or operator shall maintain monthly records of the following: emergency use hours of operation; maintenance and testing hours of operation; hours of operation for emission testing; initial start-up testing hours; hours of operation for all other uses; and the type of fuel used. All records shall be retained for a minimum of 36 months.</p> | <p>The following condition will be included on the permit:</p> <ul style="list-style-type: none"> • {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] |

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

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.

As described above, the project requires only ministerial approval, and is exempt from the provisions of CEQA. As such, an Indemnification Agreement or a Letter of Credit will not be required for this project in the absence of expressed public concern.

IX. Recommendation

Pending a successful NSR public noticing period, issue Authority to Construct S-9921-1-0 subject to the permit conditions on the attached draft ATC in Appendix A.

X. Billing Information

| Billing Schedule | | | |
|-------------------------|---------------------|------------------------|-------------------|
| Permit Number | Fee Schedule | Fee Description | Fee Amount |
| S-9921-1-0 | 3020-10-F | 1,829 bhp IC engine | \$900 |

Appendixes

- A. Draft ATC
- B. BACT Guideline and BACT Analysis
- C. Emissions Data Sheet
- D. RMR and AAQA
- E. QNEC Calculations
- F: Engine Vendor Responses

Appendix A
Draft ATC

*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-9921-1-0

LEGAL OWNER OR OPERATOR: CXA LA PALOMA LLC
MAILING ADDRESS: LA POLOMA PUMPING STATION
BUTTONWILLOW, CA 93206

LOCATION: LA PALOMA PUMP STATION
BUTTONWILLOW, CA 93206

SECTION: 19 **TOWNSHIP:** 29S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

1,829 BHP (INTERMITTENT) CATERPILLAR MODEL C32 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

CONDITIONS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. {4749} This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115]
6. {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]
7. Emissions from this IC engine shall not exceed any of the following limits: 3.74 g-NOx/bhp-hr, 0.52 g-CO/bhp-hr, or 0.07 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

S-9921-1-0 : Feb 3 2022 1:33PM -- RAMIREZH : Joint Inspection NOT Required

8. Emissions from this IC engine shall not exceed 0.04 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
9. {4261} This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702]
10. {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
11. {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115]
12. {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702 and 17 CCR 93115]
13. {3496} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
14. {4920} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201, 4102, and 4702, and 17 CCR 93115]
15. {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
16. {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

DRAFT

Appendix B
BACT Guideline and BACT Analysis

San Joaquin Valley Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 3.1.1
Last Update: 6/13/2019
Emergency Diesel IC Engine

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

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

This application was deemed complete on January 20, 2022. Therefore, BACT Guideline 3.1.1 (June 13, 2019) was in effect at the time the project was deemed complete and will be used for this emergency diesel IC engine. 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 steps were taken:

- Conduct a survey of all the emergency IC engines permitted in the District to determine the latest EPA Tier certification level that has been permitted for the proposed engine size
- Conduct a survey of the major IC engine manufacturers/genset vendors to determine the latest EPA Tier certification level that is readily available for the proposed engine size and use
- Review Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines to determine the latest Tier certification level required in California for the proposed engine size

Survey of Permitted Units:

The latest EPA Tier certification for engines greater than 750 bhp is Tier 4F. The District currently has existing Tier 4F and numerous Tier 2 diesel-fired IC engines permitted for emergency standby use rated greater than 750 bhp.

IC Engine Availability:

Although certain Tier 4F engines have been available, the applicant has provided compelling reasons for the use of Tier 2 engine. The applicant has provided responses it received from various vendors for requests for quotes for Tier 4F engines in the proposed size range. (See Appendix F for the Engine Vendor Responses.) Some vendors did not have Tier 4F engines available in the proposed size range, while other vendors indicated that a Tier 4F engine would not be available for at least 42 weeks. Thus, it has been determined that a Tier 4F engine is not available for this project.

Stationary ATCM:

Table 1 of the CARB Stationary Air Toxic Control Measure (ATCM) for stationary emergency standby diesel-fired IC engines requires a Tier 2 certification level for IC engines rated greater than 750 bhp. The ATCM does not require a Tier certification level higher than Tier 2 for engines rated greater than 750 bhp.

Summary:

The proposed emergency IC engine is rated at 1,829 bhp. The District has not permitted any emergency diesel-fired IC engines rated greater than 750 bhp with a tier certification level higher than Tier 2. Moreover, according to the engine manufacturers and genset vendors contacted, a Tier 2 certification level is the latest available for a 1,829 bhp emergency standby diesel-fired IC engine powering a generator.

Based on the above analysis, the District finds that a Tier 4F emergency IC engine/generator with a rating of approximately 1,829 bhp is not readily available.

Consequently, the District considers a Tier 2 certification level to be the latest available Tier certification level for the proposed engine size. Furthermore, a Tier 2 certification level satisfies the stationary ATCM requirement for emergency standby IC engines rated greater than 750 bhp.

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

2. BACT Analysis for PM₁₀ Emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

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

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

Please note the proposed Tier 2 IC engine has a PM emission factor of 0.04 g/hp-hr. Additionally, the ATCM requires a PM emission standard of 0.15 g/hp-hr for all new emergency standby diesel IC engines.

Therefore, the proposed PM/PM₁₀ emission factor of 0.04 g/hp-hr meets BACT requirements, and also satisfies the stationary ATCM requirement for new emergency standby diesel IC engines.

b. Step 2 - Eliminate technologically infeasible options

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

c. Step 3 - Rank remaining options by control effectiveness

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

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

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

Appendix C
Emissions Data Sheet



Quinn Power Systems

Post Office Box 227044
Los Angeles, CA 90022-0744

March 22, 2021

**RE: Caterpillar C32 Emergency Engine Rated at 1,829 HP, Driving
1,250 kW Generator Sets**

The engine in this generator set is manufactured and certified by Caterpillar, Inc. The engine is rated at 1,829 bhp and serves the Caterpillar 1,250 kW size generator.

The engine meets EPA standards and California Air Resources Board (CARB) Airborne Toxic Control Measure (ATCM) limits. The engine is certified by the Environmental Protection Agency (EPA) for Stationary Emergency applications, equivalent to Tier 2 Non-Road Standards, under Engine Family MCPXL32.0NZS for model year 2021.

Following are general specifications for this engine:

| | |
|---------------------------|----------------------------|
| Manufacturer: | Caterpillar |
| Engine Model: | C32 |
| Generator Model (Rating): | 1,250 kW |
| Engine Rating: | 1,829 bhp |
| Type: | 4 cycle |
| Fuel at Rated HP | Diesel, 87.4 gal/hr |
| Cylinder Configuration: | Vee-12 |
| Engine Speed: | 1800 rpm |
| Emissions Control: | Turbocharged, After-cooled |
| Stack Flow: | 10,0006 acfm |
| Stack Temperature: | 807 °F |

Emissions are the values posted for the EPA certification data for this engine family. These emissions are as follows in g/kW-hr:

| Steady State NMHC | Steady State NOX | Steady State NMHC+NOX | Steady State CO | Steady State PM |
|----------------------|---------------------|--------------------------|--------------------|--------------------|
| 0.10 | 5.01 | 5.1 | 0.7 | 0.06 |

The emissions, converted to g/bhp-hr, are as follows:

| Steady State NMHC | Steady State NOX | Steady State NMHC+NOX | Steady State CO | Steady State PM |
|----------------------|---------------------|--------------------------|--------------------|--------------------|
| 0.07 | 3.74 | 3.80 | 0.5 | 0.04 |

Oxides of Sulfur (Sox) is not measured during certification, but a value of 0.002 g/bhp-hr can be used, which reflects the use of Ultra Low Sulfur Diesel (ULSD) which contains less than 15 parts per million by weight of SOx compounds.

If you have any questions, please call me at 562-463-6013.

Sincerely,

A handwritten signature in cursive script that reads "Bob Shepherd".

Bob Shepherd
Manager – Sustainability & Compliance

Appendix D
Technical Services Memo and AAQA

San Joaquin Valley Air Pollution Control District

Risk Management Review and Ambient Air Quality Analysis

To: Homero Ramirez – Permit Services
 From: Michael Scott – Technical Services
 Date: February 2, 2022
 Facility Name: CXA LA PALOMA LLC
 Location: LA PALOMA PUMP STATION, BUTTONWILLOW
 Application #(s): S-9921-1-0
 Project #: S-1213653

1. Summary

1.1 RMR

| Units | Prioritization Score | Acute Hazard Index | Chronic Hazard Index | Maximum Individual Cancer Risk | T-BACT Required | Special Permit Requirements |
|------------------------|----------------------|--------------------|----------------------|--------------------------------|-----------------|-----------------------------|
| 1 | 0.02 | NA ¹ | NA ¹ | NA ¹ | No | Yes |
| Project Totals | 0.02 | NA ¹ | NA ¹ | NA ¹ | | |
| Facility Totals | <1 | 0.00 | 0.00 | 0.00E+00 | | |

Notes:

- The project passed with a prioritization score less than 1; therefore, no further analysis was required.

1.2 AAQA

| Pollutant | Air Quality Standard (State/Federal) | | | | |
|-----------------------|--------------------------------------|-----------------|-----------------|-----------------|-------------------|
| | 1 Hour | 3 Hours | 8 Hours | 24 Hours | Annual |
| CO | NA ² | | NA ² | | |
| NO_x | NA ² | | | | Pass |
| SO_x | NA ² | NA ² | | NA ² | Pass |
| PM10 | | | | NA ² | Pass ⁴ |
| PM2.5 | | | | NA ² | Pass ⁵ |

Notes:

- Results were taken from the attached AAQA Report.
- 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.
- The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2) unless otherwise noted below.
- Modeled PM10 concentrations were below the District SIL for non-fugitive sources of 1 µg/m³ for the annual concentration.
- Modeled PM2.5 concentrations were below the District SIL for non-fugitive sources of 0.2 µg/m³ for the annual concentration.

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

Unit # 1

1. The PM₁₀ emissions rate shall not exceed 0.04 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.

2. Project Description

Technical Services received a request on January 25, 2022 to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for the following:

Unit -1-0: 1,829 BHP (INTERMITTENT) CATERPILLAR MODEL C32 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

3. RMR Report

3.1 Analysis

The District performed an analysis pursuant to the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, May 28, 2015) to determine the possible cancer and non-cancer health impact to the nearest resident or worksite. This policy requires that an assessment be performed on a unit by unit basis, project basis, and on a facility-wide basis. If a preliminary prioritization analysis demonstrates that:

- A unit's prioritization score is less than the District's significance threshold and;
- The project's prioritization score is less than the District's significance threshold and;
- The facility's total prioritization score is less than the District's significance threshold

Then, generally no further analysis is required.

The District's significant prioritization score threshold is defined as being equal to or greater than 1.0. If a preliminary analysis demonstrates that either the unit's or the project's or the facility's total prioritization score is greater than the District threshold, a screening or a refined assessment is required

If a refined assessment is greater than one in a million but less than 20 in one million for carcinogenic impacts (Cancer Risk) and less than 1.0 for the Acute and Chronic hazard indices(Non-Carcinogenic) on a unit by unit basis, project basis and on a facility-wide basis the proposed application is considered less than significant. For unit's that exceed a cancer risk of 1 in one million, Toxic Best Available Control Technology (TBACT) must be implemented.

Toxic emissions for this project were calculated using the following methods:

Toxic emissions for the proposed unit were calculated and provided by the processing engineer.

These emissions were input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy, risks from the proposed unit's toxic emissions were prioritized using the procedure in the 2016 CAPCOA Facility Prioritization Guidelines. The prioritization score for this proposed unit was less than 1.0 (see RMR Summary Table). Therefore, no further analysis was necessary.

The following parameters were used for the review:

| Source Process Rates | | | | | | |
|----------------------|------------|------------------|---------------|---------------------|---------------------|-----------------------|
| Unit ID | Process ID | Process Material | Process Units | Hourly Process Rate | Annual Process Rate | Receptor Distance (m) |
| 1 | 1 | PM10 | LBS | 0.16 | 8 | >2,000 |

4. AAQA Report

The District modeled the impact of the proposed project on the National Ambient Air Quality Standard (NAAQS) and/or California Ambient Air Quality Standard (CAAQS) in accordance with District Policy APR-1925 (Policy for District Rule 2201 AAQA Modeling) and EPA's Guideline for Air Quality Modeling (Appendix W of 40 CFR Part 51). The District uses a progressive three level approach to perform AAQAs. The first level (Level 1) uses a very conservative approach. If this analysis indicates a likely exceedance of an AAQS or Significant Impact Level (SIL), the analysis proceeds to the second level (Level 2) which implements a more refined approach. For the 1-hour NO₂ standard, there is also a third level that can be implemented if the Level 2 analysis indicates a likely exceedance of an AAQS or SIL.

The modeling analyses predicts the maximum air quality impacts using the appropriate emissions for each standard's averaging period. Required model inputs for a refined AAQA include background ambient air quality data, land characteristics, meteorological inputs, a receptor grid, and source parameters including emissions. These inputs are described in the sections that follow.

Ambient air concentrations of criteria pollutants are recorded at monitoring stations throughout the San Joaquin Valley. Monitoring stations may not measure all necessary pollutants, so background data may need to be collected from multiple sources. The following stations were used for this evaluation:

| Monitoring Stations | | | | |
|---------------------|---|--------|-------------|------------------|
| Pollutant | Station Name | County | City | Measurement Year |
| NOx | 548 WALKER ST., 548 WALKER ST., 548 WALKER ST., 548 WALKER ST., 93263 | Kern | Shafter | 2018 |
| PM10 | Bakersfield-California Avenue | Kern | Bakersfield | 2018 |
| PM2.5 | Bakersfield-California Avenue | Kern | Bakersfield | 2018 |
| SOx | Fresno - Garland | Fresno | Fresno | 2018 |

Technical Services performed modeling for directly emitted criteria pollutants with the emission rates below:

| Emission Rates (lbs/year) | | | | | | |
|----------------------------------|----------------|------------|------------|-----------|-------------|--------------|
| Unit ID | Process | NOx | SOx | CO | PM10 | PM2.5 |
| 1 | 1 | 754 | 1 | 105 | 8 | 8 |

The AERMOD model was used to determine if emissions from the project would cause or contribute to an exceedance of any state of federal air quality standard. The parameters outlined below and meteorological data for 2013-2017 from Hanford (rural dispersion coefficient selected) were used for the analysis:

The following parameters were used for the review:

| Point Source Parameters | | | | | | |
|--------------------------------|-------------------------|---------------------------|-------------------|------------------------------|---------------------------|-----------------------------------|
| Unit ID | Unit Description | Release Height (m) | Temp. (°K) | Exit Velocity (m/sec) | Stack Diameter (m) | Vertical/Horizontal/Capped |
| 1 | 1,829 BHP DICE | 3.66 | 704 | 47.52 | 0.36 | Vertical |

5. Conclusion

5.1 RMR

The cumulative prioritization score for the facility, including this project, is less than 1.0. **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.

5.2 AAQA

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

6. Attachments

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

Appendix E

QNEC Calculations

Quarterly Net Emissions Change (QNEC)

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

QNEC = PE2 - PE1, where:

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

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

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

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

| QNEC | | |
|------------------|-------------------|------------------------|
| Pollutant | PE2 Total (lb/yr) | Quarterly PE2 (lb/qtr) |
| NO _x | 754 | 188.5 |
| SO _x | 1 | 0.3 |
| PM ₁₀ | 8 | 2.0 |
| CO | 105 | 26.3 |
| VOC | 14 | 3.5 |

Appendix F

Engine Vendor Responses



Quinn Power Systems

Post Office Box 226789
Los Angeles, CA 90022-0489

December 16, 2021

Subject: 1250 kW Tier 4 Final Genset Not Available for Emergency Standby

Quinn Power Systems, the Caterpillar distributor covering the San Joaquin Valley, is submitting this letter due to our confirm Caterpillar does not have a Tier 4 Final 1250 kW genset. Only Tier 2 in this size would be available.

If you have any questions, please call me at 562-463-6013.

Sincerely,

A handwritten signature in cursive script that reads "Bob Shepherd".

Bob Shepherd, P.E.
Manager – Sustainability and Compliance
Quinn Power Systems

From: Terry Benson <TBenson@lapalomagc.com>
Sent: Tuesday, January 4, 2022 11:51 AM
To: Frank Schneider; Madry, Kevin
Subject: Global Power Supply budgetary quote attached

Frank / Kevin

Attached is a global power email train for the generator Tier 4 system.

Terry Benson
Facility Manager.
CXA La Paloma, LLC
1760 West Skyline Road
McKittrick, CA 93251
Office: 661-762-6002
Fax : 661-762-6049
CELL: 661-203-9292
TBenson@lapalomagc.com

From: Claude New <CNewIII@lapalomagc.com>
Sent: Tuesday, January 4, 2022 9:25 AM
To: Terry Benson <TBenson@lapalomagc.com>
Subject: Fwd: Hello Claude, budgetary quote attached

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

Begin forwarded message:

From: Claude New <CNewIII@lapalomagc.com>
Date: December 14, 2021 at 2:06:00 PM PST
To: Terry Benson <TBenson@lapalomagc.com>
Subject: FW: Hello Claude, budgetary quote attached

If you go with a rental style unit you can get 1250kW Tier 4F, Permanent model is Tier 2.

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

From: Hannah Jenner <hannah.jenner@globalpwr.com>
Sent: Tuesday, December 14, 2021 2:02 PM
To: Claude New <CNewIII@lapalomagc.com>; Michael Wolfe
<mike.wolfe@globalpwr.com>
Subject: Re: Hello Claude, budgetary quote attached

EXTERNAL MESSAGE: Use caution when clicking links or attachments

If you go with a rental style unit you can get 1250kW Tier 4F. We have this option in stock:

<https://www.globalpwr.com/products-page/diesel-generators/hipower-1000-kw-hrvw-1250-t4f-2/>
\$489,000

New Hipower 1000 kW HRVW 1250 T4F Diesel Generator (#7700)

New Prime Hipower Diesel Generator, Model HRVW 1250 T4F, 1000 kW, Multi-Voltage Volts, Serial# U12102357 ,sku #7700

www.globalpwr.com

Hannah Jenner
Sales Project Manager

Global Power Supply
Direct (805) 724-0686
Main (800) 706-0906
Email hjenner@globalpwr.com



From: Claude New <CNewIII@lapalomagc.com>
Sent: Tuesday, December 14, 2021 1:58 PM
To: Hannah Jenner <hannah.jenner@globalpwr.com>; Michael Wolfe <mike.wolfe@globalpwr.com>
Subject: RE: Hello Claude, budgetary quote attached

Is all 1250 that only go to Tier 2?

Thanks

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

From: Hannah Jenner <hannah.jenner@globalpwr.com>
Sent: Tuesday, December 14, 2021 1:39 PM
To: Claude New <CNewIII@lapalomagc.com>; Michael Wolfe <mike.wolfe@globalpwr.com>
Subject: Re: Hello Claude, budgetary quote attached

EXTERNAL MESSAGE: Use caution when clicking links or attachments

Hi Claude

The DS1250 is only available as a Tier 2.

Thanks

Hannah Jenner
Sales Project Manager

Global Power Supply
Direct (805) 724-0686
Main (800) 706-0906
Email hjenner@globalpwr.com



From: Claude New <CNewIII@lapalomagc.com>
Sent: Tuesday, December 14, 2021 1:08 PM
To: Michael Wolfe <mike.wolfe@globalpwr.com>
Cc: Hannah Jenner <hannah.jenner@globalpwr.com>
Subject: RE: Hello Claude, budgetary quote attached

Good afternoon,

The New MTU DS1250 Diesel Generator Tier 2 diesel is it available in a Tier 4 and if so, what would be the new cost?

Thanks

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

From: Michael Wolfe <mike.wolfe@globalpwr.com>
Sent: Tuesday, October 5, 2021 11:50 AM
To: Claude New <CNewIII@lapalomagc.com>
Cc: Hannah Jenner <hannah.jenner@globalpwr.com>
Subject: Hello Claude, budgetary quote attached

EXTERNAL MESSAGE: Use caution when clicking links or attachments

Hello Claude, budgetary quote attached, let us know if you are interested in moving forward with a purchase.

Mike Wolfe
Team Lead, Power Solutions
Direct: Mobile / IP 832.735.5255
Secondary Cell 805-705-1868
mike.wolfe@globalpwr.com
<http://www.globalpwr.com>

Global Power Supply, LLC.
Covering North America

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From: Michael Wolfe
Sent: Thursday, August 19, 2021 8:45 AM
To: cnewiii@lapalomagc.com
Cc: Hannah Jenner <hannah.jenner@globalpwr.com>; Nate Sutton <nate.sutton@globalpwr.com>
Subject: Hello Claude, quote for 1250KW backup generator (turnkey)

Hello Claude, we can do a site walk next Friday, does that work for you?

After that it will take us about 2-3 weeks to get you a formal turnkey proposal, will that timing work for you?

Global Power Supply
Mike Wolfe
Team Lead Power Generation
Work Mobile (832) 735-5255
Personal cell (805) 705-1868
Email mike.wolfe@globalpwr.com



This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

From: Terry Benson <TBenson@lapalomagc.com>
Sent: Tuesday, January 4, 2022 11:49 AM
To: Frank Schneider; Madry, Kevin
Subject: Cummins Sales & Service Generator RFQ 1250kW Standby Generator
Attachments: s-1675 1500DQGAS Tier 4.pdf

Frank / Kevin

please see the attached email train from Cummings on the tiered 4 system.

Terry Benson
Facility Manager.
CXA La Paloma, LLC
1760 West Skyline Road
McKittrick, CA 93251
Office: 661-762-6002
Fax : 661-762-6049
CELL: 661-203-9292
TBenson@lapalomagc.com

From: Claude New <CNewIII@lapalomagc.com>
Sent: Tuesday, January 4, 2022 9:28 AM
To: Terry Benson <TBenson@lapalomagc.com>
Subject: Fwd: Generator RFQ 1250kW Standby Generator

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

Begin forwarded message:

From: Claude New <CNewIII@lapalomagc.com>
Date: December 17, 2021 at 6:27:00 AM PST
To: Terry Benson <TBenson@lapalomagc.com>
Subject: **FW: Generator RFQ 1250kW Standby Generator**

Tier 2 only also.

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

From: Max Montero <max.montero@cummins.com>
Sent: Thursday, December 16, 2021 9:51 PM
To: Claude New <CNewIII@lapalomagc.com>
Cc: Steve H Lee <steve.h.lee@cummins.com>
Subject: RE: Generator RFQ 1250kW Standby Generator

EXTERNAL MESSAGE: Use caution when clicking links or attachments

Claude,

Unfortunately, we do not have 1250KW rated Certified Tier 4 generator. The generator I quoted you is 1250DQGAA(1250KW) Tier 2 generator but I included the Cummins Aftertreatments to Comply with Tier 4 emission levels. The engine is stamped Tier 2 but the emission levels meets the Tier 4 emission requirement. SJVAPCD accepts Tier 4 Compliant(Tier 2 engine with Aftertreatments) diesel generators

We have 1500KW factory certified Tier 4, see attached specs sheet. Please advise if you want me to quote this.

Thank you.

Max Montero

Territory Manager - Power Generation Sales
Northern LA, Kern, Ventura, Santa Barbara & San Luis Obispo Counties

Cummins Inc.

d/b/a Cummins Sales & Service

1939 Deere Ave
Irvine, CA 92606

Phone (949) 253-6058

Cell (949) 275-6302

salesandservice.cummins.com

max.montero@cummins.com

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please notify the sender immediately by return email and promptly delete this message and its attachments from your computer system.

From: Claude New <CNewIII@lapalomagc.com>
Sent: Thursday, December 16, 2021 2:13 PM
To: Max Montero <max.montero@cummins.com>
Cc: Steve H Lee <steve.h.lee@cummins.com>
Subject: FW: Generator RFQ 1250kW Standby Generator
Importance: High

EXTERNAL SENDER: This email originated outside of Cummins. Do not click links or open attachments unless you verify the sender and know the content is safe.

Guys,

Is the Cummins 1250DQGAA Tier 2 diesel available in a Tier 4 and if so, what would be the new cost?

Thanks

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

From: Claude New
Sent: Tuesday, December 14, 2021 12:51 PM
To: Max Montero <max.montero@cummins.com>
Subject: FW: Generator RFQ 1250kW Standby Generator
Importance: High

Max,

Is the Cummins 1250DQGAA Tier 2 diesel available in a Tier 4 and if so, what would be the new cost?

Thanks

Claude New III

Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

From: Max Montero <max.montero@cummins.com>
Sent: Monday, November 22, 2021 3:26 PM
To: Claude New <CNewIII@lapalomagc.com>
Subject: Generator RFQ 1250kW Standby Generator
Importance: High

EXTERNAL MESSAGE: Use caution when clicking links or attachments

Claude,

Thank you for taking my call this morning and this opportunity.

Please confirm receipt of the following attachments:

1. Cummins 1250DQGAA Tier 2 diesel specs sheet
2. Conceptual drawing of 1250DQGAA/B with enclosure, sub-base day tank and Cummins Aftertreatments for Tier 4 emission compliance
3. Convault UL2085 brochure

This quotation is based on your email with the following clarifications and exceptions:

1. Delivery is included; offloading, rigging and erection are not included and are by the INstalling Contractor.
2. Installation, wiring, cabling, diesel fuel, SJVAPCD Emission Permit, other Permits and Sales Tax are not included.
3. Cummins do not have 4000A ATS at the moment. Will quote ASCO ATS if desired.
4. Fuel line plumbing and control wiring between our sub-base day tank and the main storage tank are not included.

Leadtime:

1. Submittals – within 4 weeks from receipt of Hold for Release PO
2. Generator – 42 weeks from approved submittals and order release for production.

Please advise questions and or any other info or data you need.
Thanks again.

Max Montero

Territory Manager - Power Generation Sales
Northern LA, Kern, Ventura, Santa Barbara & San Luis Obispo Counties

Cummins Inc.

d/b/a Cummins Sales & Service

1939 Deere Ave
Irvine, CA 92606

Phone (949) 253-6058

Cell (949) 275-6302

salesandservice.cummins.com

max.montero@cummins.com

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ned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

From: Terry Benson <TBenson@lapalomagc.com>
Sent: Tuesday, January 4, 2022 4:33 PM
To: Frank Schneider; Madry, Kevin
Subject: FW: Kohler 1250KW Quote

Terry Benson
Facility Manager.
CXA La Paloma, LLC
1760 West Skyline Road
McKittrick, CA 93251
Office: 661-762-6002
Fax : 661-762-6049
CELL: 661-203-9292
TBenson@lapalomagc.com

From: Claude New <CNewIII@lapalomagc.com>
Sent: Tuesday, January 4, 2022 9:36 AM
To: Terry Benson <TBenson@lapalomagc.com>
Subject: Fwd: Kohler 1250KW Quote

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251
Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

Begin forwarded message:

From: Kris Lintz <klintz@bcew.com>
Date: December 27, 2021 at 10:20:25 AM PST
To: Claude New <CNewIII@lapalomagc.com>
Cc: Jamie Vandenakker <jvandenakker@bcew.com>
Subject: Kohler 1250KW Quote

EXTERNAL MESSAGE: Use caution when clicking links or attachments

KD1250-A, 480V, 3Ph, Sound House (no belly tank) – \$397,674.00 lead time is 44-46 weeks.

KCP-DMVC-4000S – \$76,700.00 lead time is 34-36 weeks.
5,000 gallon 2085 tank, with spill box and vents – \$68,555.00 lead time is 16-20 weeks.

Pricing includes equipment, freight, and start-up. Pricing does not include installation, permitting, engineering, and any DPF or T4 system if needed.
Install and 20' container are things I cannot provide pricing for.

Thanks.

Please RSVP to join us on January 20th in our Rancho Cucamonga facility to celebrate 100 Years of KOHLER Power. Click [HERE](#) for Details!



Kris Lintz
Industrial Sales Executive
Bay City Electric Works | www.bcew.com
Phone: (866) 938-8200 | Mobile: (619) 496-7806
E-mail: klintz@bcew.com

From: Claude New <CNewIII@lapalomagc.com>
Sent: Wednesday, December 22, 2021 6:07 AM
To: Kris Lintz <klintz@bcew.com>
Subject: [EXTERNAL] RE: Kohler 1250KW Quote

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

1250kW Standby Generator Tier 2

New Caterpillar, Model C32 Diesel Standby Generator Set. Rated 1250kW, w/fan, 60Hz, 3Ph, 277/480V at 1800 RPM.

New Caterpillar, Model CTSD, Automatic Transfer Switch, Delayed Transition. Rated 4000A, 3P, 277/480V, 60Hz, 3Ph, NEMA 3R Enclosure.

New 5000 Gallon UL2085 Free Standing Rectangular Fuel Tank, Equipped with Vents, Manways, Fittings and Spill Box (48 Hour Run Time) Mounted inside 20' Container

Installation of 1250kW Generator, 5000 Gallon Fuel Tank, 4000amp Automatic Transfer Switch.

Yes outdoors, will need to be weather and soundproof, Buttonwillow CA, no school, this job will be new construction.

Claude New III
Maint. Supervisor
NAES CORPORATION
CXA La Paloma Generating LLC
1760 West Skyline Road
McKittrick, CA 93251

Office 661.762.6001
Cell. 661.369.6995
Cnewiii@lapalomagc.com

From: Kris Lintz <klintz@bcew.com>
Sent: Tuesday, December 21, 2021 3:53 PM
To: Claude New <CNewIII@lapalomagc.com>
Cc: Jamie Vandenakker <jvandenakker@bcew.com>
Subject: Kohler 1250KW Quote

EXTERNAL MESSAGE: Use caution when clicking links or attachments

Good afternoon Claude,

I didn't get any attachments if you sent them in. Can you forward them to me and/or answer a few questions so that I may give you some numbers.

Prime or standby?

Will it be outdoors and need an enclosure(weather or sound)? Or inside a building somewhere?

What size fuel tank?

What city will the unit be installed? Will it be close to any schools? (generators near schools need special permitting for emissions)

Will they require an automatic transfer switch to switch the power when the utility fails?

Is there an electrical contractor that will complete the install or does your company perform installs?

(install includes removal of existing equipment if any, setting new equipment, pulling conductors, pouring concrete pads, etc)

Thank you.

Please RSVP to join us on January 20th in our Rancho Cucamonga facility to celebrate 100 Years of KOHLER Power. Click [HERE](#) for Details!



Kris Lintz
Industrial Sales Executive
Bay City Electric Works | www.bcew.com
Phone: (866) 938-8200 | Mobile: (619) 496-7806
E-mail: klintz@bcew.com