

August 29, 2022

Martha Samora
Encompass Health Rehabilitation Hospital
5001 Commerce Dr
Bakersfield, CA 93309

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: S-1380
Project Number: S-1212551

Dear Ms. Samora:

Enclosed for your review and comment is the District's analysis of Encompass Health Rehabilitation Hospital's application for an Authority to Construct for the installation of a 900 horsepower Tier 2 diesel-fired emergency internal combustion engine, at 5001 Commerce Dr, Bakersfield.

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 Ms. Paola Pantoja of Permit Services at (661) 392-5617.

Sincerely,



Brian Clements
Director of Permit Services

BC:PP

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: Encompass Health Rehab. Hospital Date: 05/17/2022
Mailing Address: 5001 Commerce Dr Engineer: Paola Pantoja
Bakersfield, CA 93309 Lead Engineer: Dan Klevann
Contact Person: Martha Samora, CEO
Telephone: (661) 864-4073
E-mail: martha.samora@encompasshealth.com
Application #: S-1380-3-0
Project #: S-1212551
Deemed Complete: 11/24/2021

I. Proposal

Encompass Health Rehabilitation Hospital is proposing to install a 900 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 (11/14/13)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary
Compression-Ignition (CI) Engines
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 5001 Commerce Dr, Bakersfield, CA. See Appendix F.

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-1380-3-0: 900 BHP (INTERMITTENT) CATERPILLAR MODEL C-8 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 District is aware that the availability of Tier 4 Final (Tier 4F) certified IC engines is improving, and that some Tier 4F IC engines are currently in use, in emergency standby applications. Consequently, the use of a Tier 4F certified IC engine must be considered as part of the District's BACT analysis for this project.

The applicant provided justification for why Tier 3 and 4 certified IC emergency engines are not suitable for this specific application. See application submittal from Caterpillar included in the BACT Analysis in Appendix B. The proposed Tier 2 engine will satisfy BACT as it meets the latest Tier Certification requirements for emergency standby engines that is available and feasible for this application; therefore, the engine meets the latest ARB/EPA emissions standards for diesel particulate matter, hydrocarbons, nitrogen oxides, and carbon monoxide.

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%
PM ₁₀ fraction of diesel exhaust:	0.96 (CARB, 1988)
Conversion factor:	1.34 bhp/kw

B. Emission Factors

Emission Factors		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO _x	5.75	Engine Manufacturer
SO _x	0.0051	Mass Balance Equation Below
PM ₁₀	0.03	ARB/EPA Certification
CO	0.46	ARB/EPA Certification
VOC	0.02	Engine Manufacturer

$$\frac{0.000015-S}{lb-fuel} \times \frac{7.1lb-fuel}{gallon} \times \frac{2lb-SO_2}{1lb-S} \times \frac{1gal}{137000Btu} \times \frac{1bhpinput}{0.35bhpoutput} \times \frac{2542.5Btu}{bhp-hr} \times \frac{453.6g}{lb} = 0.0051 \frac{g-SO_2}{bhp-hr}$$

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:

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

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

Post Project Emissions (PE2)						
Pollutant	Emission s Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Annual Hours of Operation (hrs/year)	Daily PE2 (lb/day)	Annual PE2 (lb/yr)
NO _x	5.8	900	24	50	276.2	575
SO _x	0.0051	900	24	50	0.2	1
PM ₁₀	0.03	900	24	50	1.4	3
CO	0.5	900	24	50	23.8	50
VOC	0.01	900	24	50	0.5	1

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.

SSPE1 is summarized in the following table, from project S-1133440.

SSPE1 (lb/year)					
Permit Unit/ERC	NO_x	SO_x	PM₁₀	CO	VOC
S-1380-1-1	140	4	6	56	5
S-1380-2-0	383	0	12	216	17
SSPE1	523	4	18	272	22

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	PM ₁₀	CO	VOC
SSPE1	523	4	18	272	22
S-1380-3-0	575	1	3	50	1
SSPE2	1098	5	21	322	23

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	523	4	18	18	272	22
SSPE2	1098	5	21	21	322	23
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 following¹:

- 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,

¹ 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.

- 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	276.2	> 2.0	n/a	Yes
SO _x	0.2	> 2.0	n/a	No
PM ₁₀	1.4	> 2.0	n/a	No
CO	23.8	> 2.0 and SSPE2 ≥ 200,000 lb/yr	318	No
VOC	0.5	> 2.0	n/a	No

As shown above, BACT will be triggered for NO_x 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

The facility has proposed to install a 900 bhp Tier 2 certified IC engine. Therefore, BACT is satisfied for NO_x.

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)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE2	1098	5	21	322	23
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. Therefore, public noticing for this project for New Major Source, Federal Major Modification, or SB 288 Major Modification purposes is not required.

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 this project 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	523	1099	20,000 lb/year	No
SO _x	4	5	54,750 lb/year	No
PM ₁₀	18	21	29,200 lb/year	No
CO	272	322	200,000 lb/year	No
VOC	22	23	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), therefore, public noticing for SSIPE purposes is not required.

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: 5.75 g-NOx/bhp-hr, 0.46 g-CO/bhp-hr, or 0.02 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- {4772} Emissions from this IC engine shall not exceed 0.03 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 one. According to the Technical Services Memo for this project (Appendix D), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

RMR Summary			
Categories	Emergency IC Engine (Unit #-1)	Project Totals	Facility Totals
Prioritization Score	6.88	6.88	>1
Acute Hazard Index	NA	NA	0.00
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk	1.76E-08	1.76E-08	1.83E-07
T-BACT Required?	No		
Special Permit Conditions?	Yes		

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District’s thresholds for triggering T-BACT requirements; therefore, compliance with the District’s Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District’s significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 20 in a million). As outlined by the Technical Services Memo in Appendix D of this report, the emissions increases for this project were determined to be less than significant.

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 0.03 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.

$$0.1 \frac{\text{grain-PM}_{10}}{\text{dscf}} \times \frac{154.3 \text{ grain}}{\text{g}} \times \frac{1 \text{ Btu}}{0.35 \text{ Btu}} \times \frac{9,05 \text{ dscf}}{1 \text{ Btu}} \times \frac{2,545 \text{ Btu}}{1 \text{ bhp-hr}} \times \frac{0.96 \text{ g-PM}_{10}}{1 \text{ g-PM}_{10}} = 0.4 \frac{\text{g-PM}_{10}}{\text{bhp-hr}}$$

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 conditions 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 5.9 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 5.9 are applicable to emergency standby engines

Section 5.9 requires the owner to:

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

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

5.9.4 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

$$R \text{ (universal gas constant)} = \frac{1073 \text{ psi ft}^3}{\text{lb-mol} \cdot \text{°R}}$$

$$\frac{0.000015 \text{ lb-S}}{\text{lb-fuel}} \times \frac{7.11 \text{ lb}}{\text{gal}} \times \frac{64 \text{ lb-SO}_2}{32 \text{ lb-S}} \times \frac{1 \text{ MMBtu}}{9,054 \text{ cf}} \times \frac{1 \text{ gal}}{0.13 \text{ MMBtu}} \times \frac{1 \text{ lb-mol}}{64 \text{ lb-SO}_2} \times \frac{10.73 \text{ psi-ft}^3}{\text{lb-mol-°R}} \times \frac{520 \text{ °R}}{14.7 \text{ psi}} \times 1,000,000 = 1.0 \text{ ppmv}$$

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 style="text-align: center;">Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators</p>	<p style="text-align: center;">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 ≤ 0.01 g/bhp-hr, then the engine is allowed 100 hours per year. Emissions from this engine are certified at 0.03 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 0.03 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-1380-3-0 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-1380-3-0	3020-10-E	900 bhp IC engine	\$723

Appendixes

- A. Draft ATC
- B. BACT Guideline and BACT Analysis
- C. Emissions Data Sheet and/or ARB/EPA Certification
- D. RMR and AAQA
- E. QNEC Calculations
- F: Project Map

Appendix A
Draft ATC and Emissions Profile

*San Joaquin Valley
Air Pollution Control District*

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1380-3-0

LEGAL OWNER OR OPERATOR: ENCOMPASS HEALTH REHABILITATION HOSPITAL
MAILING ADDRESS: 5001 COMMERCE DR
BAKERSFIELD, CA 93309

LOCATION: 5001 COMMERCE DR
BAKERSFIELD, CA 93309

EQUIPMENT DESCRIPTION:

900 BHP (INTERMITTENT) CATERPILLAR MODEL C-8 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: 5.75 g-NOx/bhp-hr, 0.46 g-CO/bhp-hr, or 0.02 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
8. Emissions from this IC engine shall not exceed 0.03 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

S-1380-3-0 : Jun 13 2022 12:41PM -- PANTOJAP : Joint Inspection NOT Required

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

DRAFT

Permit #: S-1380-3-0	Last Updated
Facility: ENCOMPASS HEALTH REHABILITATION	06/06/2022 PANTOJAP

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	570.0	1.0	3.0	46.0	2.0
Daily Emis. Limit (lb/Day)	273.8	0.2	1.4	21.9	1.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	143.0	0.0	1.0	12.0	1.0
Q2:	143.0	0.0	1.0	12.0	1.0
Q3:	142.0	0.0	1.0	11.0	1.0
Q4:	142.0	0.0	1.0	11.0	1.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

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 <enter date project was deemed complete>. 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 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 proposed emergency IC engine is rated at 900 bhp. Based on the latest survey of all permitted emergency IC engines powering electrical generators in the horsepower range applicable to the proposed unit, the District found that a Tier 2 certification level is the highest certification level that has been permitted for an IC engine of the size associated with the proposed project.

Survey of IC Engine Manufacturers/Genset Vendors:

Based on the latest survey of the major IC engine/genset manufacturers and vendors (Cummins, Caterpillar, Kohler, MQ Power, etc.) to determine the availability of Tier 4F certified units in the size range associated with the proposed project that are suitable for stationary emergency standby applications, the District concluded that no Tier 4F certified unit is suitable and available for stationary emergency standby use in the size range appropriate for the proposed project.

Note: If a T4F genset is available (such as a 500 kW Caterpillar model C18 unit or a 1000 kW Cummins model DQFAH unit) but has not been installed and operated, we will not consider it to be achieved in practice.

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 900 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 900 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 900 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.

Recommendations for Effective Regulation of Emissions for Stationary Engines in Emergency Power Applications

T.J. Tarabulski
Emissions Regulatory Affairs, Caterpillar Inc.

November 16, 2020

Subject: Tier 4 Not Recommended nor Required for Stationary Emergency Diesel Generators

Background: To meet Tier 4 emission limits, a Selective Catalytic Reduction (SCR) exhaust after treatment system with Diesel Particulate Filter (DPF) and auxiliary items are needed. Regulations exempt Stationary Emergency (and Standby) Diesel Generators from meeting Tier 4.

Negative points if considering use of T4 Certified:

- System is ineffective in standby operation due to warmup time and loading requirements.
- System could cause the genset to shut down during an emergency due to inducement requirements because the regulations were never designed to include emergency standby operation. This would trigger EPA reporting requirements.
- Substantial additional operation and maintenance required for a more complicated system including shelf life issues for the Diesel Exhaust Fluid used by the SCR.
- Longer run times for maintenance will reduce available emergency run hours.
- System cannot be modified or removed in the future without a new AQMD permit.

Above points and background are covered in more detail in the attached White Paper from CAT factory.

Myths about Tier 4:

- “It will become a requirement in the future.”
As the current technology available to meet Tier 4 has been determined to not be viable for standby, Tier 4 systems will never be required for new installations, nor will existing installations ever be expected to replace current Best Available (emission) Control Technology (BACT = Tier 2/3 with DPF) with an SCR system.
If new technology is developed that will function in standby applications, we can expect the rules may be modified to require NEW installations to include same, but existing gensets would be grandfathered. There is always the possibility that new technology could replace the diesel genset entirely or could be a simple add-on, but having an ineffective Tier 4 system would not likely exempt an existing facility from upgrading.
- “Tier 4 will allow us to run the units more and/or in addition to standby”.
SCAQMD regulations prohibit using any stationary emergency engine for anything other than to support loss of utility. The emission limits for engines used other than for standby are lower than Tier 4 and cannot be achieved with current Diesel engines and after treatment technologies.

In conclusion, Quinn Power Systems believes Tier 4 equipment is not intended for nor should it be considered for use in stationary emergency applications. Please contact us to discuss the above in further detail or to answer any other concerns you might have.

Sincerely,
Quinn Power Systems



David G. Lewis
Application Engineer
562) 463-6043

INTRODUCTION

This paper is intended to inform the actions of regulatory bodies so that regulations are aligned with the intended air quality improvement objectives. This paper provides specific recommendations on how to regulate engines used in emergency power applications to achieve better air quality outcomes than what is realized by simple replication of prime power regulations.

Stationary engines used for emergency power should be regulated differently than stationary engines used for prime power. Emergency engines operate very few hours per year and have distinct operating profiles that result in a much different environmental impact than prime power engines.

RECOMMENDATION AND BASIS

1. Best Available Control Technology (BACT) Standards for emergency diesel engines should remain at Tier 2 (emergency) above 560 bkW and at Tier 3 (emergency) at or below 560 bkW as Tier 4 (non-emergency) emissions levels will not be achieved in practice in significant portions of emergency engine operations; this request for **emergency engine** applications should not be misinterpreted to imply that Tier 4 engines are not effective in **non-emergency** engine applications that operate high hours per year where startup and shutdown are a small fraction of operating time.
2. Emergency gas engine levels should be set at 1.5 g/bhp-hr NO_x and 2.0 g/bhp-hr CO for all horsepower ranges; VOC should be set at 1.5 g/bhp-hr for less than 130 hp, and 1.0 g/bhp-hr for greater than or equal to 130 hp. Such levels are achievable with a certified gas engine that is exempt from source test requirements under EPA's NSPS regulations.
3. It is important to note the above approaches would also minimize greenhouse gas (GHG) emissions from emergency applications.
4. Air permitting authorities, as an alternative to cost ineffective solutions, should limit emergency hours of operation (200 hours typical) with force majeure permit provisions for emergency engines in extraordinary grid-power outages to more accurately represent emergency engine impacts on an airshed.

BACKGROUND

U.S. EPA determined¹ that the use of aftertreatment devices such as Selective Catalytic Reduction (SCR) and Diesel Particulate Filters (DPF) were not justified based on cost effectiveness (\$/ton reduced) for emergency diesel engines in both the NSPS regulations for new engines (40 CFR Part 60 Subpart IIII) and in the regulation of hazardous air pollutants from new and existing engines (NESHAP, 40 CFR 63 Subpart ZZZZ). These regulations require the engines to meet 2007 emissions standards (Tier 3 for 75 HP to 750 HP, and Tier 2 for engines > 750 HP).

In 2011, California Air Resources Board (CARB) Airborne Toxic Control Measure (ATCM) agreed with EPA's reasoning and aligned with EPA regulations to also allow this stationary emergency engine exemption, excepting CARB adopted a 0.15 g/bhp-hr PM for engines < 175 hp.

More stringent particulate matter (PM) emissions levels are required in California, such as the area under jurisdiction of South Coast Air Quality Management District (SCAQMD), to meet area-specific requirements ("sensitive receptor") or for major sources including Federal Title V facilities. None of these regional requirements mandates the use of Tier 4 certified engines.

SCAQMD limits emergency engines to 200 hours total /year which minimizes the modeled and realistic potential emissions in the airshed as an alternative to adding costly controls to engines that run on average < 50 hrs./year. Limiting testing and maintenance to non-ozone forming hours of the day will also mitigate emissions impact notwithstanding facility constraints that may apply..

Appendix A shows the steady state NO_x concentration (ppm) for testing and maintenance conditions and full engine power output operation of a diesel engine. The EPA Tier 4 standard is reported in grams/bkW-hr based on a weighted average of 5 operating points and some of the operating conditions may be above the absolute value of the Tier 4 standard.

¹ US EPA June 2006 - Regulatory Impact Analysis of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (PDF), page 61

The test cycle does not include the no load (note: zero kW drives g/kW-hr to infinity) high idle operating condition typical of testing and maintenance. Therefore, emissions are not at Tier 4 g/kW-hr levels for the no load testing and maintenance condition, but operation is the lowest mass flow rate possible for engine operation and the mass flow is small when compared to full load exhaust mass flow rates. At zero engine load operation, the required engine temperature for the SCR system to operate will not be achieved. Engines with lower ratings than the example shown would typically have lower engine operating temperatures, especially at less than full load, and thus the time needed to reach the operating temperature of the SCR will be longer. Emergency engines typically run between 0% and 60% load when tested and less than 60% load during emergencies. In other words, even a Tier 4 engine will not achieve Tier 4 in practice in an emergency application.

Several considerations exist when investigating the use of Tier 4 certified technology in stationary emergency diesel engine applications:

1. Certified Tier 4 engines must have safeguards (inducements) to prevent the operation of the engine with certain emissions related faults. For example, certified Tier 4 engines will derate and eventually shut off without diesel exhaust fluid (DEF). The engine can also shut down with high exhaust backpressure. These unexpected shutdowns subordinate the mission of an emergency engine to provide power during an emergency. The EPA does allow the SCR induced engine shutdown to be overridden during an emergency, but only up to 120 hours of operation after which the engine will shut down without a factory override reset. This 120-hour shutdown could occur during an extended emergency and thus could risk human life, public health and safety or critical services. The DPF cannot be bypassed by the operator so DPF backpressure risk cannot be eliminated.
2. SCR systems require high operating temperatures. Achieving optimum operating temperature profiles typically requires at least 20 to 30 minutes at typical emergency engine loads. Emergency standby engines typically have short operation sessions resulting in exhaust temperatures that are too cool for NO_x reduction to occur. This limitation of SCR makes them ineffective during typical testing and maintenance operations. The result is Tier 4 emissions levels are not achieved in practice for these short duration events.
3. NO_x reductions using SCR are also dependent upon demand load. A lightly loaded engine that is typically operated for short periods of time would not achieve the full NO_x reduction potential of the SCR system (see attached). Most operating hours for emergency standby engines occur when performing maintenance and testing checks at low engine loads. Artificially increasing these testing and maintenance loads to elevate temperatures increases GHG emissions at a minimum.
4. SCR requires the use of DEF, a urea-based solution, for the catalytic reaction. This required fluid requires separate storage from the diesel tank. DEF has a limited shelf life and will also degrade over long periods of time. With low hour usage on emergency engines, unused fluids that degrade over time could require additional system maintenance. Additionally, these urea systems could increase the maintenance test frequency.
5. DPFs on emergency engines will also pose their own issues. DPFs typically require engines to operate at higher loads for longer periods or add heat to properly regenerate (burn carbon). This increases fuel consumption resulting in larger required tanks to satisfy minimum run time. This will also increase GHG emissions (CO₂). Some customers may request a bypass to assure the systems never interfere with normal operation. If misused, such bypasses may further reduce control effectiveness and may be considered a defeat device and or tampering if used as part of an EPA certified system.
6. Additional operating and maintenance time under loaded conditions will be required in order to assure proper functioning of the DPFs or to activate SCR dosing. With the already low limits on emergency engine operation (generally less than 200 hours per year total and often less than 50 hours per year including maintenance and repair) added time for maintenance will further limit the possible run time for actual emergencies.
7. Tier 4 engines with aftertreatment systems require more building space and floor loading considerations for engine, urea tank and control systems. Additional structural supports, plumbing, electrical and exhaust ducts may also be required. Load banks or supplemental exhaust heat may also be needed to ensure proper engine loading to prevent DPF plugging. This will increase fuel consumption and GHG emissions (CO₂).
8. Costs for Tier 4 diesel engine generators, installation of necessary additional design requirements, and increased maintenance requirements will run as much as 60% to over 100% more than the standard emergency Tier 2 above 560 kW and Tier 3 at or below 560 kW. These costs, for engines that typically operate far below stringent State or Federal hour limits, will far exceed cost-effectiveness (\$/ton) basis for engine emission regulation to Tier 4 levels.

ADDITIONAL CONSIDERATIONS FOR SPARK IGNITION ENGINES

This analysis is also applicable to Spark-ignited engines, consistent with EPA NSPS standards. EPA NSPS is clear on source test requirements for a noncertified engine on initial installation and every 3 years thereafter. Certified engines do not require source testing per NSPS. There is no other state or local air district applicable regulation—it is a federally mandated minimum requirement. Manufacturers are only certifying to the emergency and prime gas engine NSPS standards of 2.0 g/bhp-hr NO_x and 1.0 g/bhp-hr NO_x respectively. Thus, by setting emergency gas engine BACT at 0.5 g/bhp-hr the air district has automatically imposed an expensive source test (\$5K - \$10K per engine) on initial installation and every 3 years thereafter on the end user.

EPA regulations place the “performance test” requirement on the end user, not on the manufacturer due to this being a site specific NSPS requirement. In most cases, the very low NO_x engine will also require the installation of an oxidation catalyst to reduce the CO and VOC to the BACT levels set by authorities. Such regulations should allow manufacturers to voluntarily certify emergency gas engines so that end users are not forced into an expensive, on-going source testing requirement and additional oxidation catalysts for engines that are intended to operate infrequently and for limited hours. Removal of certified OEM engine emissions components/aftertreatment on certified engines to meet a different BACT standard than the US EPA NSPS requirements would be counterproductive for certified products and reintroduce the source test requirement.

CONCLUSION

For all of the foregoing reasons, BACT for emergency diesel engines should be aligned with EPA and CARB regulations which require Tier 2 above 560 bkW and Tier 3 below 560 bkW, as Tier 4 emissions levels will not be achieved in practice, are not cost effective and may compromise safety for stationary emergency diesel applications. Therefore, Tier 4 engine systems would be misapplied for emergency installations, notwithstanding Tier 4 systems are installed in facilities despite the recognition that Tier 4 levels are not achieved in practice in significant portions of emergency engine operations.

Emergency gas engine BACT should be maintained in alignment or revised to allow certified gas engines requirements to align with EPA NSPS’ exemption to eliminate costly initial and on-going source testing. Emergency gas engine BACT must allow for certified engines to be used without modification.

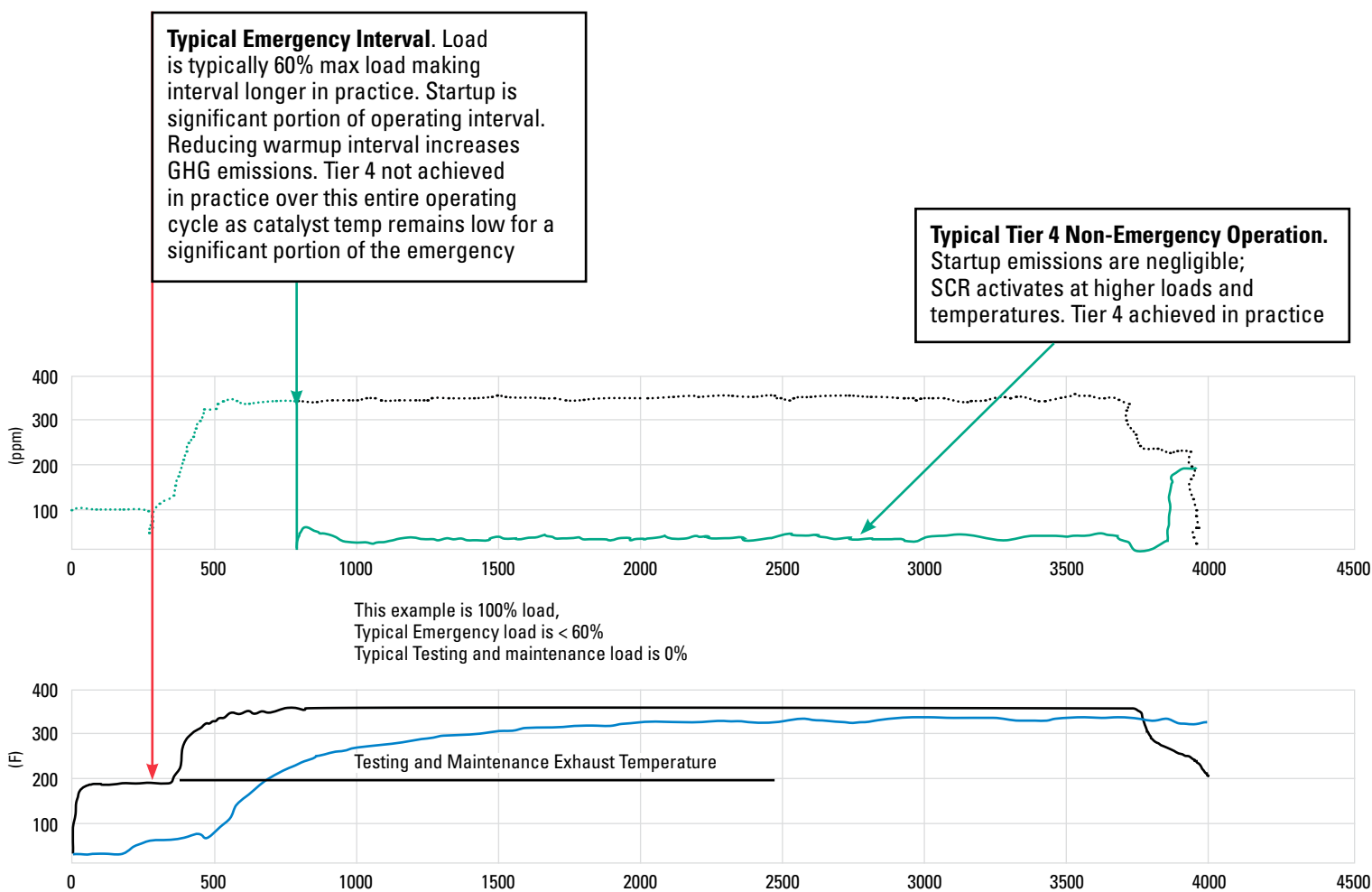
In short, to achieve optimum air quality outcomes beyond what is realized by simple application of prime power regulations to emergency engines, stationary engines used for emergency power should be regulated differently than stationary engines used for prime power and aligned with existing EPA and CARB emergency engine regulations.

APPENDIX A

Emergency Engine Operation of a Cat® C-175 3 MW Non-Emergency Engine (Tier 4)

This example is representative of typical aftertreatment equipped engines above and below 560 kW at 100% load with extended high idle at startup that represents typical testing and maintenance.

Typical Testing and Maintenance interval. NOx sensor is not operating initially, and emissions are represented by the black line for the duration. SCR does not activate during entire test. Mass flow is very low due to no electrical power output. Tier 4 not achieved in practice due to low catalyst inlet temperature over the duration (400 F). Engine operates at high idle (1800 rpm). Test periods range from 5-60 minutes.



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LEXE1792-00 September 2020

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Appendix C
Emissions Data Sheet and or ARB/EPA Certification

Standby & Prime: 60Hz



Image shown might not reflect actual configuration

Engine Model	Cat® C18 ACERT™ In-line 6, 4-cycle diesel
Bore x Stroke	145mm x 183mm (5.7in x 7.2in)
Displacement	18.1 L (1106 in³)
Compression Ratio	14.5:1
Aspiration	Turbocharged Air-to-Air Aftercooled
Fuel Injection System	MEUI
Governor	Electronic ADEM™ A4

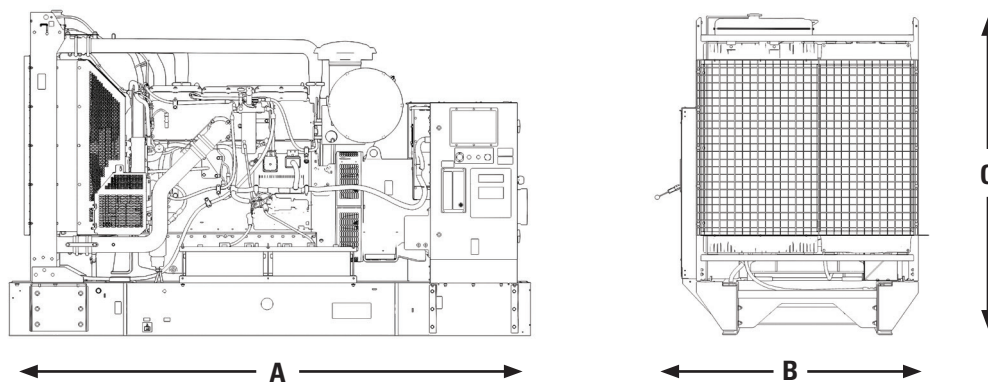
Model	Standby	Prime	Emission Strategy
C18	600 ekW, 750 kVA	545 ekW, 681 kVA	TIER II Non-Road

PACKAGE PERFORMANCE

Performance	Standby	Prime
Frequency	60 Hz	
Genset Power Rating	750 kVA	681 kVA
Genset power rating with fan @ 0.8 power factor	600 ekW	545 ekW
Emissions	TIER II Non-Road	
Performance Number	DM8518-04	DM8522-05
Fuel Consumption		
100% load with fan, L/hr (gal/hr)	161.6 (42.7)	151.1 (39.9)
75% load with fan, L/hr (gal/hr)	129.6 (34.2)	123.6 (32.6)
50% load with fan, L/hr (gal/hr)	91.7 (24.2)	89.2 (23.6)
25% load with fan, L/hr (gal/hr)	46.8 (12.4)	48.7 (12.9)
Cooling System¹		
Radiator air flow restriction (system), kPa (in. Water)	0.12 (0.48)	0.12 (0.48)
Radiator air flow, m³/min (cfm)	803 (28357)	803 (28357)
Engine coolant capacity, L (gal)	20.8 (5.5)	20.8 (5.5)
Radiator coolant capacity, L (gal)	61 (16)	61 (16)
Total coolant capacity, L (gal)	82 (22)	82 (22)
Inlet Air		
Combustion air inlet flow rate, m³/min (cfm)	47.8 (1687.8)	46.7 (1649.0)
Max. Allowable Combustion Air Inlet Temp, °C (°F)	49 (120)	49 (120)
Exhaust System		
Exhaust stack gas temperature, °C (°F)	534.6 (994.3)	518.2 (964.8)
Exhaust gas flow rate, m³/min (cfm)	135.5 (4784.4)	129.6 (4576.4)
Exhaust system backpressure (maximum allowable) kPa (in. water)	10.0 (40.0)	10.0 (40.0)
Heat Rejection		
Heat rejection to jacket water, kW (Btu/min)	189 (10747)	175 (9953)
Heat rejection to exhaust (total) kW (Btu/min)	634 (36053)	596 (33895)
Heat rejection to aftercooler, kW (Btu/min)	153 (8700)	142 (8076)
Heat rejection to atmosphere from engine, kW (Btu/min)	86 (4902)	83 (4726)

Emissions (Nominal) ²	Standby		Prime	
NOx, mg/Nm ³ (g/hp-hr)	2798.7 (5.8)		2462.2 (5.1)	
CO, mg/Nm ³ (g/hp-hr)	225.2 (0.5)		195.1 (0.4)	
HC, mg/Nm ³ (g/hp-hr)	3.8 (0.01)		5.0 (0.01)	
PM, mg/Nm ³ (g/hp-hr)	13.3 (0.03)		13.1 (0.03)	
Alternator ³				
Voltages	480V	600V	480V	600V
Motor starting capability @ 30% Voltage Dip	1633 skVA	2023 skVA	1633 skVA	2023 skVA
Current	902 amps	722 amps	819 amps	656 amps
Frame Size	LC7024F	LC7024H	LC7024F	LC7024H
Excitation	AR	AR	AR	AR
Temperature Rise	150 ° C	130 ° C	125 ° C	105 ° C

WEIGHTS & DIMENSIONS



Dim "A" mm (in)	Dim "B" mm (in)	Dim "C" mm (in)	Dry Weight kg (lb)
3477 (137)	1628 (64)	2102 (83)	4431 (9769)

APPLICABLE CODES AND STANDARDS:

AS1359, CSA C22.2 No100-04, UL142, UL489, UL869, UL2200, NFPA37, NFPA70, NFPA99, NFPA110, IBC, IEC60034-1, ISO3046, ISO8528, NEMA MG1-22, NEMA MG1-33, 2006/95/EC, 2006/42/EC, 2004/108/EC.

Note: Codes may not be available in all model configurations. Please consult your local Cat Dealer representative for availability.

STANDBY: Output available with varying load for the duration of the interruption of the normal source power. Average power output is 70% of the standby power rating. Typical operation is 200 hours per year, with maximum expected usage of 500 hours per year.

PRIME: Output available with varying load for an unlimited time. Average power output is 70% of the prime power rating. Typical peak demand is 100% of prime rated kW with 10% overload capability for emergency use for a maximum of 1 hour in 12. Overload operation cannot exceed 25 hours per year.

RATINGS: Ratings are based on SAE J1349 standard conditions. These ratings also apply at ISO3046 standard conditions.

DEFINITIONS AND CONDITIONS

¹ For ambient and altitude capabilities consult your Cat dealer. Air flow restriction (system) is added to existing restriction from factory.

² Emissions data measurement procedures are consistent with those described in EPA CFR 40 Part 89, Subpart D & E and ISO8178-1 for measuring HC, CO, PM, NOx. Data shown is based on steady state operating conditions of 77° F, 28.42 in HG and number 2 diesel fuel with 35° API and LHV of 18,390 BTU/lb. The nominal emissions data shown is subject to instrumentation, measurement, facility and engine to engine variations. Emissions data is based on 100% load and thus cannot be used to compare to EPA regulations which use values based on a weighted cycle.

³ UL 2200 Listed packages may have oversized generators with a different temperature rise and motor starting characteristics. Generator temperature rise is based on a 40° C ambient per NEMA MG1-32.

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LEHE1581-02 (05/20)

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Appendix D
RMR and AAQA

San Joaquin Valley Air Pollution Control District

Risk Management Review and Ambient Air Quality Analysis

To: Paola Pantoja – Permit Services
 From: Michael Scott – Technical Services
 Date: July 08, 2022
 Facility Name: ENCOMPASS HEALTH REHABILITATION HOSPITAL
 Location: 5001 COMMERCE DR, BAKERSFIELD
 Application #(s): S-1380-3-0
 Project #: S-1212551

1. Summary

1.1 RMR

Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required	Special Permit Requirements
3	6.88	NA ¹	0.00	1.76E-08	No	Yes
Project Totals	6.88	NA ¹	0.00	1.76E-08		
Facility Totals	>1	0.00	0.00	1.83E-07		

Notes:

- Acute Hazard Index was not calculated for Unit 3 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.

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 # 3

1. The PM₁₀ emissions rate shall not exceed 0.03 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 March 02, 2022 to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for the following:

Unit -3-0: 900 BHP (INTERMITTENT) CATERPILLAR MODEL C-8 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 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 2013-2017 from Bakersfield (urban dispersion coefficient selected) to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the SHARP Program, which then used the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Source Process Rates					
Unit ID	Process ID	Process Material	Process Units	Hourly Process Rate	Annual Process Rate
3	1	PM ₁₀	LBS	0.0595	2.98

Point Source Parameters						
Unit ID	Unit Description	Release Height (m)	Temp. (°K)	Exit Velocity (m/sec)	Stack Diameter (m)	Vertical/Horizontal/Capped
3	900 BHP Emergency DICE	2.26	807	44.57	0.25	Vertical

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	Bakersfield-Muni	Kern	Bakersfield	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
3	1	575.4	3	0	2.98	2.98

The AERMOD model was used to determine if emissions from the project would cause or contribute to an exceedance of any state or federal air quality standard. The parameters outlined below and meteorological data for 2013-2017 from Bakersfield (urban 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
3	900 BHP Emergency DICE	2.26	807	44.57	0.25	Vertical

5. Conclusion

5.1 RMR

The cumulative acute and chronic indices for this facility, including this project, are below 1.0; and the cumulative cancer risk for this facility, including this project, is less than 20 in a million. In addition, the cancer risk for each unit in this project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

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

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

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	570	142.5
SO _x	1	0.3
PM ₁₀	3	0.8
CO	46	11.5
VOC	2	0.5

Appendix F

Project Map

PROJECT NUMBER
173062.00

DRAWN BY
Author

DATE
11-20-2018

REV	DESCRIPTION	DATE

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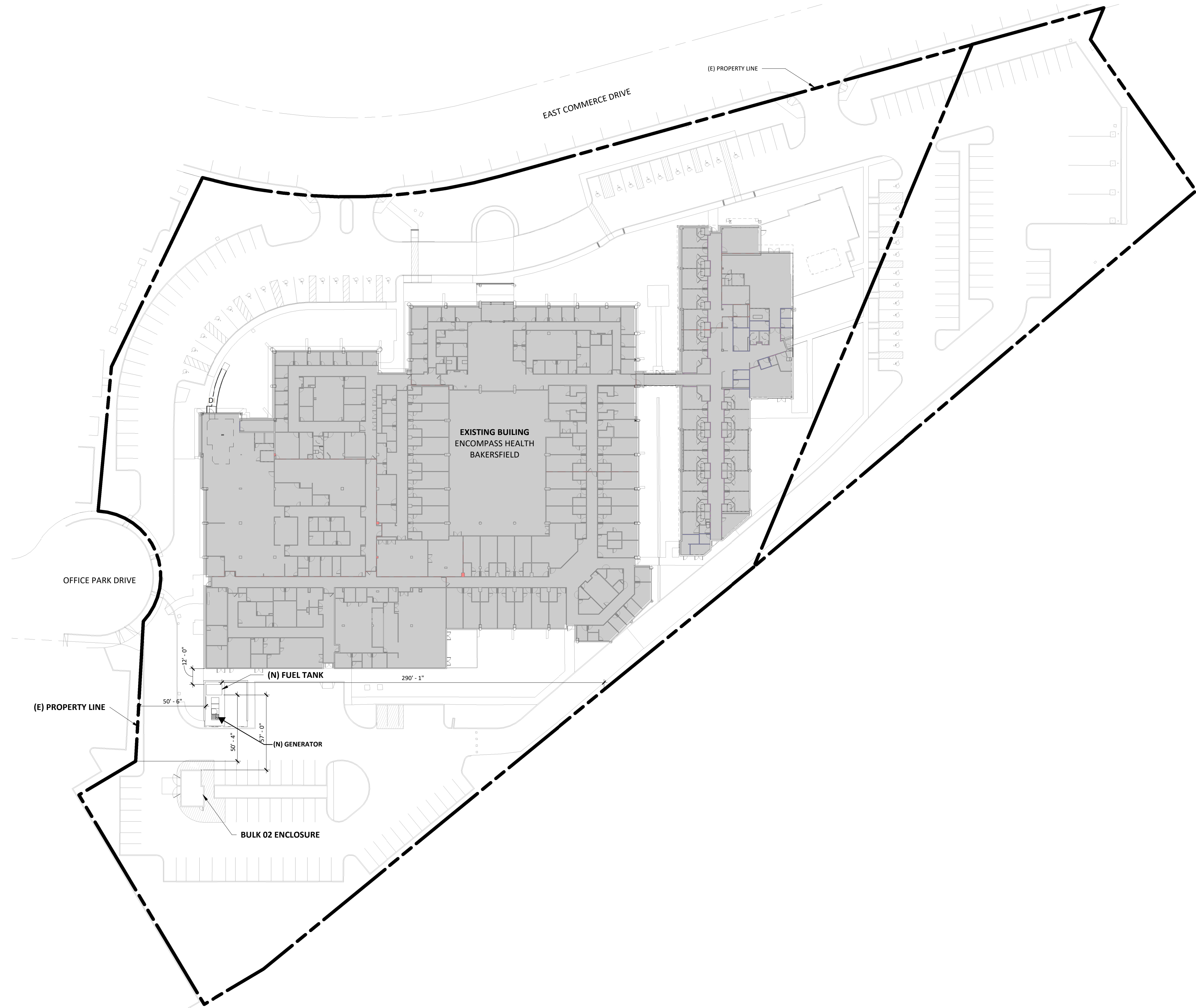
OSHPD APPROVAL STAMP

OSHPD#: S201159-15-00

SHEET TITLE
SITE MAP

SHEET NUMBER

SK-1



1 SITE MAP
A2.20 | SK-1 | 1" = 40'-0"