



July 1, 2021

Manuel Silva Silva Dairy Farms #3 1499 Edminster Rd Stevinson, CA 95374

Re: Notice of Preliminary Decision - Authority to Construct Facility Number: N-6120 Project Number: N-1204881

Dear Mr. Silva:

Enclosed for your review and comment is the District's analysis of Silva Dairy Farms #3's application for an Authority to Construct for a 768 horsepower Tier 2 certified diesel engine to provide emergency power in the event of an electrical outage, at 1499 Edminster Rd in Stevinson, CA.

The notice of preliminary decision for this project has been posted on the District's website (<u>www.valleyair.org</u>). 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. Dakota Ballard of Permit Services at (559) 230-5865.

Sincerely,

Brian Clements Director of Permit Services

BC:dhb

Enclosures

cc: Courtney Graham, CARB (w/ enclosure) via email Ryan Sundstrom, Reddy Power Services

> Samir Sheikh Executive Director/Air Pollution Control Officer

Northern Region 4800 Enterprise Way Modesto, CA 95356-8718 Tel: (209) 557-6400 FAX: (209) 557-6475 Central Region (Main Office) 1990 E. Gettysburg Avenue Fresno, CA 93726-0244 Tel: (559) 230-6000 FAX: (559) 230-6061 Southern Region 34946 Flyover Court Bakersfield, CA 93308-9725 Tel: (661) 392-5500 FAX: (661) 392-5585

www.valleyair.org www.healthyairliving.com

San Joaquin Valley Air Pollution Control District Authority to Construct Application Review

Agricultural Diesel-Fired Emergency Standby IC Engine

Facility Name:	Silva Dairy Farms #3	Date:	July 1, 2021
Mailing Address:	1499 Edminsiter Rd	Engineer:	Dakota Ballard
	Stevinson, CA 95322	Lead Engineer:	Jerry Sandhu
Contact Person:	Manuel Silva		
Telephone:	209-652-6582		
Application #:	N-6120-12-0		
Project #:	N-1204881		
Complete:	February 5, 2021		

I. Proposal

Silva Dairy Farms #3 is proposing to install a 768 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 1499 Edminsiter Rd in Stevinson, 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 which will be used for the growing of crops and/or animals. Other than emergency standby operation, the engine may be operated up to 100 hours per year for maintenance and testing purposes.

V. Equipment Listing

N-6120-12-0: 768 BHP (INTERMITTENT) VOLVO PENTA MODEL TAD1641GE 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; 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 very low-sulfur diesel fuel (0.0015% by weight sulfur maximum) reduces SO_x emissions by over 99% from standard diesel fuel.

VII. General Calculations

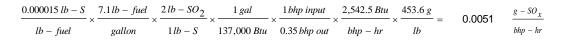
A. Assumptions

Emergency operating schedule:	24 hours/day
Non-emergency operating schedule:	100 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 $\approx 35\%$
PM ₁₀ fraction of diesel exhaust:	0.96 (CARB, 1988)
Conversion factor:	1.341 bhp/kw

To streamline emission calculations, PM2.5 emissions are assumed to be equal to PM10 emissions.

	Emission Factors							
Pollutant	Emission Factor (g/bhp-hr)	Emission Factor (g/kW-hr)	Source					
NO _X	3.87	5.19	Engine Manufacturer					
SOx	0.0051	0.0068	Mass Balance Equation Below					
PM ₁₀	0.084	0.112	Engine Manufacturer					
CO	0.51	0.69	Engine Manufacturer					
VOC	0.12	0.16	Engine Manufacturer					

B. Emission Factors



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 PE are calculated as follows:

Daily PE2 (lb-pollutant/day) = EF (g-pollutant/bhp-hr) x rating (bhp) x operation (hr/day) / 453.6 g/lb

Annual PE2 (lb-pollutant/yr) = EF (g-pollutant/bhp-hr) x rating (bhp) x operation (hr/yr) / 453.6 g/lb

	Post Project Emissions (PE2)							
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Daily Hours of Operation (hrs/day)	Annual Hours of Operation (hrs/year)	Daily PE2 (Ib/day)	Annual PE2 (lb/yr)		
NOx	3.87	768	24	100	157.3	655		
SOx	0.0051	768	24	100	0.2	1		
PM10	0.084	768	24	100	3.4	14		
CO	0.51	768	24	100	20.7	86		
VOC	0.12	768	24	100	4.9	20		

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 (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) 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. See Appendix F for detailed SSPE calculations.

SSPE1							
	NOx (lb/yr)	SO _X (lb/yr)	PM ₁₀ (lb/yr)	CO (lb/yr)	VOC (lb/yr)	NH3 (lb/yr)	H2S (lb/yr)
SSPE1 Total	124	0	40,435	11	103,354	113,582	1,041

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

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs 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							
Permit Unit	NOx (lb/yr)	SO _X (lb/yr)	PM ₁₀ (lb/yr)	CO (lb/yr)	VOC (lb/yr)	NH3 (lb/yr)	H2S (lb/yr)
SSPE1	124	0	40,435	11	103,354	113,582	1,041
N-6120-12-0	655	1	14	86	20	0	0
SSPE2 Total	779	1	40,449	97	103,374	113,582	1,041

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

Since agricultural operations do not fall under any of the specific source categories specified in 40 CFR 51.165, fugitive emissions are not counted when determining if an agricultural operation is a major source.

Since emissions at this facility are not actually collected, a determination of whether emissions could be reasonably collected must be made by the permitting authority. The California Air Pollution Control Association (CAPCOA) prepared guidance in 2005 for estimating potential to emit of Volatile Organic Compounds from dairy farms. The guidance states that "VOC emissions from the milking centers, cow housing areas, corrals, common manure storage areas, and land application of manure are not physically contained and could not reasonably pass through a stack, chimney, vent, or other functionally-equivalent opening. No collection technologies currently exist for VOC emissions from these emissions units. Therefore, the VOC emissions from these sources are considered fugitive." The guidance also concludes that, because VOC collection technologies do exist for liquid waste systems at dairies, "… the VOC emissions from waste lagoons and storage ponds are considered non-fugitive."

The District has researched this issue and concurs with the CAPCOA assessment. All fugitive emissions are excluded from the Major Source determination.

Rule 2201 Major Source Determination (Ib/year)								
NO _X SO _X PM ₁₀ PM _{2.5} CO VOC								
SSPE1 (Non-Fugitive)	124	0	3	3	11	4,074		
SSPE2 (Non-Fugitive)	779	1	17	17	97	4,094		
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000		
Major Source?	No	No	No	No	No	No		

SSPE calculations including fugitive and non-fugitive emissions from this facility are shown in Appendix F.

Note: PM2.5 assumed to be equal to PM10

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 criteria pollutants.

7. SB 288 Major Modification

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

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

8. Federal Major Modification / New Major Source

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.

As defined in 40 CFR 51.165, Section (a)(1)(v) and part D of Title I of the CAA, a Federal Major Modification is 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. The significant net emission increase threshold for each criteria pollutant is included in Rule 2201.

Since this facility is not a Major Source for any pollutants, this project does not constitute a Federal Major Modification and no further discussion is required.

New Major Source

As demonstrated above, this facility is not becoming a Major Source as a result of this project, therefore, this facility is not a New Major Source pursuant to 40 CFR 51.165 a(1)(iv)(A)(3).

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 1070 Inspections

This rule applies to any source operation, which emits or may emit air contaminants.

This rule allows the District to perform inspections for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations. The rule also allows the District to require record keeping, to make inspections and to conduct tests of air pollution sources. Therefore, the following conditions will be listed on the ATC to ensure compliance:

- {3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]
- {3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

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

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

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

As 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 (lb/day)	BACT Threshold (lb/day)	SSPE2 (lb/yr)	BACT Triggered?			
NOx	157.3	> 2.0	n/a	Yes			
SOx	0.2	> 2.0	n/a	No			
PM ₁₀	3.4	> 2.0	n/a	Yes			
СО	20.7	> 2.0 and SSPE2 ≥ 200,000 lb/yr	97	No			
VOC	4.9	> 2.0	n/a	Yes			

As shown above, BACT will be triggered for NO_X , PM_{10} , 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 dieselfired 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:

- NOx: 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 768 bhp Tier 2 certified IC engine (with a PM10 emissions rate of 0.084 g/bhp-hr). Therefore, BACT is satisfied for NOx, VOC, and PM10

B. Offsets

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

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	779	1	40,449	97	103,374	
Offset Thresholds	20,000	54,750	29,200	200,000	20,000	
Offsets Triggered?	No	No	Yes	No	Yes	

Quantity of Offsets Required

As shown in the table above, offsets are triggered for PM10 and VOC emissions since the PM10 and VOC SSPE2 exceeds the offset trigger threshold; however,

as previously discussed, 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. <u>New Major Sources, SB288 Major Modifications, and Federal Major</u> <u>Modifications</u>

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

As calculated in Section VII.C.2, daily emissions for NO_X are greater than 100 lb/day.

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 (Ib/year)	Offset Threshold	Public Notice Required?					
NO _X	124	779	20,000 lb/year	No				
SO _X	0	1	54,750 lb/year	No				
PM ₁₀	40,435	40,449	29,200 lb/year	No				
СО	11	97	200,000 lb/year	No				
VOC	103,354	103,374	20,000 lb/year	No				

While VOC and PM10 emissions already exceed the offset threshold, no offset thresholds are being surpassed as a result of this project.

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

For this project, the proposed engine is the only emissions source 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. <u>Title V Significant Modification</u>

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 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 to ensure compliance:

- {4771} Emissions from this IC engine shall not exceed any of the following limits: 3.87 g-NOx/bhp-hr, 0.51 g-CO/bhp-hr, or 0.12 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- {4772} Emissions from this IC engine shall not exceed 0.084 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required for emergency standby IC engines to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

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

4. Reporting

No reporting is required to ensure compliance with Rule 2201.

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 PM_{10} 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 PM_{10} and $PM_{2.5}$.

Rule 2410 Prevention of Significant Deterioration

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 to ensure compliance:

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

Rule 4102 Nuisance

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

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

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* 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 Results					
Unit	Acute Hazard Index	Chronic Hazard Index	Cancer Risk	T-BACT Required?	
N-6120-12-0	N/A ¹	N/A ²	3.98 in a million	Yes	

Notes:

1. Prioritization for this unit was not conducted since the District determinded that all diesel-fired IC engines will result in a prioritization score greater than 1.0.

2. Acute Hazard Index was not calculated for Unit 12-0 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.

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is required for this project because the HRA indicates that the risk is above the District's thresholds for triggering T-BACT requirements.

For this project T-BACT is triggered for PM_{10} . T-BACT is satisfied with BACT (see Appendix B), which is:

PM₁₀: 0.15 g/bhp-hr

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 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 0.084 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 100 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 PM_{10} emission factor of 0.4 g- PM_{10} /bhp-hr.

0.1	grain – PM	x x	$x = \frac{1 B t u_{in}}{2}$	x <u>9,051<i>dscf</i></u>	$\times \frac{2,542.5 Btu}{2}$	$\times \frac{0.96 g - PM_{10}}{10}$	$= 0.4 \frac{g - PM_{10}}{10}$
0.1	dscf	15.43 <i>grain</i>	0.35 Btuout	$10^6 Btu$	1 bhp - hr	1g - PM	bhp-hr

The new engine has a PM_{10} emission factor less than 0.4 g/bhp-hr. Therefore, compliance is expected and the following condition will be listed on the ATC:

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

Rule 4701 Internal Combustion Engines - Phase 1

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

Section 4.1 of the rule specifically exempts IC engines in agricultural operations used for the growing of crops or raising of fowl or animals. Since the engine is used for the growing of crops or raising of fowl or animals, it is exempt from the requirements of this rule. Therefore, the following condition will be listed on the ATC to ensure compliance.

• {4002} This IC engine shall only be used for the growing and harvesting of crops or the raising of fowl or animals for the primary purpose of making a profit, providing a livelihood, or conducting agricultural research or instruction by an educational institution. [District Rule 4701 and 4702, and 17 CCR 93115]

Rule 4702 Internal Combustion Engines

The following summarizes District Rule 4702 requirements for emergency standby IC engines:

1. Operation of emergency standby engines is limited to 100 hours or less per calendar year for non-emergency purposes. The following condition will be included on the permit:

- {4775} 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 100 hours per calendar year. [District Rules 2201 and 4702]
- 2. 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]
- 3. 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]
- 4. Install and operate a nonresettable elapsed time meter. In lieu of installing a nonresettable elapsed time meter, the operator may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA and is allowed by Permit-to-Operate condition. The operator shall properly maintain and operate the nonresettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

The following condition shall be used:

- {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]
- 5. Emergency standby engines cannot be used to reduce the demand for electrical power when normal electrical power line service has not failed, or to produce power for the electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract. The following conditions 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]
- {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
- 6. Records of the total hours of operation, type of fuel used, purpose for operating the engine, all hours of non-emergency and emergency operation, and other support documentation must be maintained. All records shall be retained for a period of at least five years, shall be readily available, and be made available to the APCO upon request. The following conditions will be included on the permit:
 - {3496} The permittee shall maintain monthly records of emergency and nonemergency 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:

Volume SO₂ = (n x R x T) ÷ P n = moles SO₂ T (standard temperature) = 60 °F or 520 °R R (universal gas constant) = $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot \text{°R}}$

$0.000015 \ lb - S$	$\times \frac{7.1 \text{ lb}}{\dots} \times$	$\frac{64 \text{ lb} - \text{SO}_2}{3}$	< 1 MMBtu >	<1 gal	$\times \frac{lb - mol}{lb - mol}$	$\times \frac{10.73 \text{ psi} - \text{ft}^3}{2}$	$\times \frac{520^{\circ} \text{R}}{2} \times 1,000,000 =$	1.0 ppmv
lb – fuel	gal	32 lb – S	9,051 scf	0.137 MMBtu	64 lb – SO_2	$lb - mol - ^{\circ}R$	14.7 psi	

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

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

California Health & Safety Code 42301.6 (School Notice)

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

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

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

Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators	Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements
The requirements in Sections 93115.6, 93115.7, and 93115.10(a) do not apply to new stationary diesel-fueled CI engines used in agricultural operations.	 The following condition will be added to the permit: {4002} This IC engine shall only be used for the growing and harvesting of crops or the raising of fowl or animals for the primary purpose of making a profit, providing a livelihood, or conducting agricultural research or instruction by an educational institution. [District Rules 4701, 4702 and 17 CCR 93115]
Emergency engines must be fired on CARB diesel fuel, or an approved alternative diesel fuel.	The applicant has proposed the use of CARB certified diesel fuel. The proposed permit condition, requiring the use of CARB certified diesel fuel, was included earlier in this evaluation.
The engines must meet Table 6 of the ATCM, which requires the Off-road engine certification standard for the specific power rating of the proposed engine on the date of acquisition (purchase date) or permit application submittal to the District, whichever is earliest.	For emergency engines, the Off-road engine certification standards are identified in Table 1 of the ATCM ¹ . The applicant has proposed the use of an emergency engine that meets the Table 1 emission standards (Off-road engine certification standards) for the applicable horsepower range).
	The following condition will be included on the permit:

¹ Although Section 93115.8 of the ATCM states that new IC engines used in agricultural operations must meet the emissions limits in Table 6, the ATCM Staff Report clarifies that all <u>new emergency standby</u> IC engines must meet the emissions limits specified in Table 1 of the ATCM. This eliminates the requirement that new agricultural emergency standby IC engines would otherwise have to meet the after-treatment based Tier 4 standards specified in Table 6.

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.	 {4749} This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115]
An owner or operator shall maintain monthly records of the following: emergency use hours of operation; maintenance and testing hours of operation; hours of operation for emission testing; initial start-up testing hours; hours of operation for all other uses; and the type of fuel used. All records shall be retained for a minimum of 36 months.	Permit conditions enforcing these requirements were shown earlier in the evaluation.

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.

To ensure that issuance of this permit does not conflict with any conditions imposed by any local agency permit process, the following permit condition will be listed on the ATC:

 {3658} This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [Public Resources Code 21000-21177: California Environmental Quality Act].

IX. Recommendation

Pending a successful NSR Public Noticing period, issue Authority to Construct N-6120-12-0 subject to the permit conditions on the attached draft Authority to Construct in Appendix A.

X. Billing Information

Billing Schedule						
Permit Number Fee Schedule Fee Description Fee Amount						
N-6120-12-0	3020-10-D	768 bhp IC engine	\$577			

Appendixes

- A. Draft ATC
- B. BACT Guideline and BACT Analysis
- C. Emissions Data Sheet
- D. RMR Summary and AAQAE. QNEC Calculations
- F. SSPE Calculations
- G. Dairy Calculations

Appendix A Draft ATC San Joaquin Valley Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE

PERMIT NO: N-6120-12-0

LEGAL OWNER OR OPERATOR: SILVA DAIRY FARMS #3 MAILING ADDRESS: 1499 EDMINSTER RD STEVINSON. CA 95374

LOCATION:

1499 EDMINSTER RD STEVINSON, CA 95374

EQUIPMENT DESCRIPTION:

768 BHP (INTERMITTENT) VOLVO PENTA MODEL TAD1641GE TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

CONDITIONS

- 1. {3215} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 1070]
- 2. {3216} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 1070]
- {3658} This permit does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [Public Resources Code 21000-21177: California Environmental Quality Act]
- 4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 5. {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]
- 6. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

CONDITIONS CONTINUE ON NEXT PAGE

Samir Sheikh, Executive Director APCO

Brian Clements, Director of Permit Services N-6120-12-0 : Jul 1 2021 11:31AM -- BALLARDD : Joint Inspection NOT Required

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

Conditions for N-6120-12-0 (continued)

- 7. {4002} This IC engine shall only be used for the growing and harvesting of crops or the raising of fowl or animals for the primary purpose of making a profit, providing a livelihood, or conducting agricultural research or instruction by an educational institution. [District Rules 4701 and 4702, and 17 CCR 93115]
- 8. {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]
- 9. {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]
- 10. {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]
- 11. Emissions from this IC engine shall not exceed any of the following limits: 3.87 g-NOx/bhp-hr, 0.51 g-CO/bhp-hr, or 0.12 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- 12. Emissions from this IC engine shall not exceed 0.084 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- 13. {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]
- 14. {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]
- 15. {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]
- 16. {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]
- 17. {4775} 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 100 hours per calendar year. [District Rules 2201 and 4702]
- 18. {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]
- 19. {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
- 20. {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]



Appendix B 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-Fired IC Engine

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

*This is a Summary Page for this Class of Source

Top Down BACT Analysis for the Emergency IC Engine(s)

BACT Guideline 3.1.1 (June 13, 2019) applies to emergency diesel IC engines. In accordance with the District BACT policy, information from that guideline will be utilized without further analysis.

1. BACT Analysis for NOx and VOC Emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

• Latest EPA Tier Certification level for applicable horsepower range*

To determine the latest applicable Tier level, the following 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 768 bhp. Based on the latest survey of all permitted emergency IC engines powering electrical generators in the horsepower range of 750-1,000 bhp, the District found that three Tier 4F and numerous Tier 2 certified engines have been permitted.

Survey of IC Engine Manufacturers/Genset Vendors:

The applicant has contacted three engine distributers to inquire about the avilablity of Tier 4F certified engines in the power range needed for this project. The three distributers contacted were Generac, Kohler, and Blue Star Power Systems Inc. Kohler and Blue Star Power Systems Inc. have no Tier 4F certified engines in the needed power range while the District has confirmed that Generac has been unresponsive concerning this request. Considering the lack of Tier 4F certified engines from these three distributers, the District finds that Tier 4F certified engines are not considered readily available in generator configurations needed for this dairy project.

Stationary ATCM:

The CARB Stationary Air Toxic Control Measure (ATCM) for stationary emergency standby diesel-fired IC engines requires new nonroad compression-ignition engines to meet emission standards as listed in Table 1 as well as the emission standards specified in Table 1 of 40 CFR, PART 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. Subpart IIII requires generator sets manufactured in 2008 or later and between 750 bhp and 1200 bhp to have emissions standards of no more than 0.15 g-PM10/bhp-hr, 4.8 g-NMHC+NOx/bhp-hr, and 2.6 g-CO/bhp-hr. The applicant has proposed a 768 bhp Tier 2 certified engine with emissions factors of 0.084 g-PM10/bhp-hr, 3.87 g-NOx/bhp-hr, 0.12 g-VOC/bhp-hr, and 0.51 g-CO/bhp hr. Therefore, the proposed certified engine meets the emissions standards set by the ATCM and 40 CFR, PART 60, Subpart IIII.

Summary:

The proposed emergency IC engine is rated at 768 bhp. The District has permitted three different emergency diesel-fired IC engines rated greater than 750 bhp with a Tier 4F certification level. However, the engine distributors and genset vendors contacted for this project either did not respond to the applicant's and District's requests regarding the availability of a Tier 4F engine, or stated a Tier 4F engine was not readily available. Therefore, the District does not conclude that Tier 4F is "achieved in practice" for an engine of the proposed size. Moreover, the ATCM does not require a tier certification level higher than Tier 2 for engines greater than 750 bhp.

Based on the above analysis, the District finds that a Tier 4F emergency IC engine/generator with a rating of approximately 768 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

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 NOx 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 and VOC for a discussion regarding the determination of the EPA Tier level to be considered.

Please note the proposed Tier 2 certified IC engine has a PM emission factor of 0.084 g/bhp-hr. Additionally, the ATCM requires a PM emission standard of 0.15 g/bhp-hr for all new emergency standby diesel IC engines.

Therefore, the proposed PM/PM₁₀ emission factor of 0.084 g/bhp-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



NO: 164005

EXHAUST EMISSION DECLARATION

The emission data in this declaration are measured according to the test procedures specified below and on one member engine of the engine type. Emission data may vary among production engines.

TECHNICAL SPECIFICATION

Engine type:TAD1641GESpecification:869252 / 869253Module No:138052004Rated crankshaft power *):565 kWRated speed:1800 rpm*) The engine performance corresponds to ISO 3046, BS 5514 and DIN 6271.

TEST INFORMATION

Test conditions Test indentification Test date Test cycle 40 CFR part 89 27001877 May 19, 2004 5-mode US constant speed test cycle

EXHAUST EMISSIONS (weighted cycle)

CO (g/kWh)	0,69
HC (g/kWh)	0,16
NOx (g/kWh)	5,19
PM (g/kWh)	0,112

EXHAUST EMISSIONS (per cycle mode)

Mode	#	1	2	3	4	5	6	7	8
Power	(kW)	570,1	427,5	285	142,6	57,2			
NOx	(g/h)	2957	2165	1481	749	408			
HC	(g/h)	35	37	46	46	55			
CO	(g/h)	1084	232	84	107	177			
PM	(g/h)	80,7	29,5	20,5	18,9	27			
CO ₂	(g/h)	395353	284484	189290	104803	57109			
NOx	(ppm)	649	547	493	360	247			
HC	(ppm)	22	27	45	64	100			
CO	(ppm)	366	90	43	79	165			
CO ₂	(%)	8,38	6,94	6,07	4,85	3,34			
O ₂	(%)	9,19	11,14	12,32	14	16,08			
NOx	(mg/Nm ³)	1802	1820	1860	1683	1648			
HC	(mg/Nm ³)	17	25	48	85	188			
CO	(mg/Nm ³)	620	183	99	225	671			
CO ₂	(mg/Nm ³)								
Soot	(mg/Nm ³)	27	11	8	13	25			

SMOKE

Opacity (%): Acc: n.a., Lug: n.a., Peak: n.a.

Gothenburg 2005-07-07

Som Bournauer

AB Volvo Penta Product Liability 40508 Gothenburg Appendix D HRA Summary and AAQA

San Joaquin Valley Air Pollution Control District Risk Management Review and Ambient Air Quality Analysis

То:	Rupi Gill – Permit Services
From:	Keanu Morin – Technical Services
Date:	February 11, 2021
Facility Name:	Silva Dairy Farms #3
Location:	1499 Edminster Rd., Stevinson CA
Application #(s):	N-6120-12-0
Project #:	N-1204881

1. Summary

1.1 RMR

Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required	Special Permit Requirements
12-0	N/A ¹	N/A ²	0.00	3.98E-06	Yes	Yes
Project Totals	N/A ¹	N/A ²	0.00	3.98E-06		
Facility Totals	>1	0.00	0.00	3.98e-06		

Notes:

1 Prioritization for this unit was not conducted since the District determinded that all diesel-fired IC engines will result in a prioritization score greater than 1.0.

2 Acute Hazard Index was not calculated for Unit 12-0 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)								
Fonutant	1 Hour	3 Hours	8 Hours	24 Hours	Annual				
CO	NA ²		NA ²						
NO _x	NA ²				Pass				
SOx	NA ²	NA ²		NA ²	Pass				
PM10				NA ²	Pass				
PM2.5				NA ²	Pass				
Ozone	NA ²		NA ²						

Notes:

1. Results were taken from the attached AAQA Report.

2. The project is an intermittent source as defined in APR-1920. In accordance with APR-1920, compliance with short-term (i.e., 1-hour, 3-hour, 8-hour and 24-hour) standards is not required.

3. ²The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2) unless otherwise noted.

4. Modeled PM10 concentrations were below the District SIL for non-fugitive sources of 1 µg/m³ for the annual concentration.

5. Modeled PM2.5 concentrations were below the District SIL for non-fugitive sources of 0.2 µg/m3 for the annual concentration.

1.3 Proposed Permit Requirements

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

<u>Unit # 12-0</u>

- 1. The PM₁₀ emissions rate shall not exceed 0.084 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 100 hours per calendar year.

T-BACT is required for this unit because of emissions of Diesel Particulate Matter which is a PM10.

2. Project Description

Technical Services received a request on February 5, 2021 to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for the following:

 Unit -12-0: 768 BHP VOLVO MODEL TAD1641GE DIESEL-FIRED EMERGENCY ENGINE (TIER 2 CERTIFIED) 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 than1.0. 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 engine 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 2004-2008 from Los Banos (rural 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.

Source Process Rates							
Unit ID	Process ID	ess Process Material Process		Hourly Process Rate	Annual Process Rate		
12-0	1	Diesel PM	Lbs.	0.14	14		

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			
12-0	768 BHP Diesel IC Engine	3.05	751	56.74	0.20	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				
CO	Modesto-14th Street	Stanislaus	Modesto	2018				
NOx	Turlock	Stanislaus	Turlock	2018				
PM10	Turlock	Stanislaus	Turlock	2018				
PM2.5	Turlock	Stanislaus	Turlock	2018				
SOx	Fresno - Garland	Fresno	Fresno	2018				

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

Emission Rates (Ibs/hour)								
Unit ID Process NOx SOx CO PM10 PM2.5								
12-0	1	N/A ¹						
N1 /								

Notes:

1. 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.

Emission Rates (Ibs/year)							
Unit ID Process NOx SOx CO PM10 PM2.5							
12-0	1	657.00	1.00	88.00	14.00	14.00	

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 2004-2008 from Los Banos (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			
12-0	768 BHP Diesel IC Engine	3.05	751	56.74	0.20	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. However, the cancer risk for one or more units in this project is greater than 1.0 in a million. In accordance with the District's Risk Management Policy, the project is approved with 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. Facility Summary
- D. 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:

QNEC						
Pollutant	PE2 Total (lb/yr)	Quarterly PE2 (lb/qtr)				
NOx	655	163.8				
SOx	1	0.3				
PM 10	14	3.5				
CO	86	21.5				
VOC	20	5.0				

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

Appendix F SSPE Calculations

SSPE1 Total and Non-Fugitive Calculations

PTOs N-6120-1-1, -2-0, -3-1, -4-0, -5-0, -7-0, -8-0, -9-0, -10-0, and -11-0 Dairy Operations:

The following SSPE1 emission values for the dairy operations at this facility were taken from the District's Dairy Calculator. These results are shown in Appendix G. ATC -2-1 is valid and has lower emissions than PTO -2-0. However, ATC -2-1 has not been implemented yet; therefore, PTO -2-0's PE values will be used for the SSPE1 calculations.

	PE (Dairy Operations)									
Permit Unit	NOx	SOx	PM 10	CO	VOC	NH ₃	H2S			
N-6120-1-1 (Milking Parlor)	0	0	0	0	568	194	0			
N-6120-2-0 (Cows Housing)	0	0	22,697	0	20,805	43,688	0			
N-6120-3-1 (Liquid Manure Handling)	0	0	0	0	5,076	14,203	222			
N-6120-4-0 (Solid Manure Handling)	0	0	0	0	986	5,315	0			
N-6120-5-0 (Feed Storage)	0	0	0	0	31,488	0	0			
N-6120-7-0 (Milking Parlor)	0	0	0	0	400	137	0			
N-6120-8-0 (Cow Housing)	0	0	17,735	0	15,915	29,138	0			
N-6120-9-0 (Liquid Manure)	0	0	0	0	3,590	16,996	819			
N-6120-10-0 (Solid Manure)	0	0	0	0	744	3,911	0			
N-6120-11-0 (Feed Storage)	0	0	0	0	23,780	0	0			
Total PE	0	0	40,432	0	103,352	113,582	1,041			

The individual permit emissions and total PE are shown below:

N-6120-6-0

190 bhp Diesel-Fired Emergency IC Engine:

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 $\approx 35\%$

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

Emissions factors

	Diesel-fired IC Engine Emission Factors					
g/bhp·hr* Source						
NOx	5.9	Engineering Evaluation (Project N-1104249)				
SOx	0.0051	Mass Balance Equation Below				
PM ₁₀	0.12	Engineering Evaluation (Project N-1104249)				
CO	0.53	Engineering Evaluation (Project N-1104249)				
VOC	0.08	Engineering Evaluation (Project N-1104249)				

*g/bhp·hr is calculated using the lb/bhp·hr value multiplied by 453.6 g/lb.

	$\times \frac{7.1 \text{lb} \cdot \text{fuel}}{1} \times 10^{-1} \text{ s}^{-1}$	2lb · SO2	1gal	1hp input	$\frac{2,542.5Btu}{br}$	453.6g	0.005	$\underline{g \cdot SO_x}$
%S	gallon	1lb · S	ົ 137,000 Btu ົ	0.35 hp out	hp · hr	Ìb	1	hp∙hr

PE Calculations

Annual PE (lb-pollutant/yr) = EF (g-pollutant/bhp-hr) x rating (bhp) x operation (hr/yr) / 453.6 g/lb

Annual PE							
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Annual Hours of Operation (hrs/year)	Annual PE2 (Ib/yr)			
NOx	5.9	190	50	124			
SOx	0.0051	190	50	0			
PM10	0.12	190	50	3			
CO	0.53	190	50	11			
VOC	0.08	190	50	2			

SSPE1 Calculations

SSPE1									
Permit Unit	NOx	SOx	PM 10	CO	VOC	NH₃	H2S		
Total PE (Dairy Operations)	0	0	40,432	0	103,352	113,582	1,041		
N-6120-6-0 (Diesel-Fired IC Engine)	124	0	3	11	2	0	0		
Total	124	0	40,435	11	103,354	113,582	1,041		

Non-Fugitive SSPE1

As discussed in Section VII.C.5 of the engineering evaluation, fugitive emissions are not included in a facility's emission totals when determining if it is a major source. For dairy operations, only a portion of the liquid manure handling operation emissions and each of the IC engine emissions are not considered fugitive emissions. SSPE1 results of the non-fugitive calculations are shown below:

Non-Fugitive SSPE1 (lb/year)						
	NOx	SOx	PM ₁₀	PM _{2.5}	CO	VOC
N-6120-3-1 (liquid manure handling – lagoon(s)/storage pond(s))	0	0	0	0	0	2,442
N-6120-6-0 (emergency IC engine)	124	0	3	3	11	2
N-6120-9-0 (liquid manure handling – lagoon(s)/storage pond(s))	0	0	0	0	0	1,630
Non-Fugitive SSPE1	124	0	3	3	11	4,074

To streamline emission calculations, PM2.5 emissions are assumed to be equal to PM10 emissions.

Non-Fugitive SSPE2

Non-fugitive SSPE2 calculations are determined by including the proposed ATC unit's emissions values with that of the currently permitted units. Permit Unit N-6120-8-0 emission values found in Section VII.C.2 of the engineering evaluation are added to the total Non-Fugitive SSPE1 emissions values to determine Non-Fugitive SSPE2 values shown below:

Non-Fugitive SSPE2 (lb/year)						
NOx SOx PM10 PM2.5 CO VOC						VOC
Non-Fugitive SSPE1	124	0	3	3	11	4,074
N-6120-12-0(emergency IC engine)	655	1	14	14	86	20
Non-Fugitive SSPE2	779	1	17	17	97	4,094

To streamline emission calculations, PM2.5 emissions are assumed to be equal to PM10 emissions.

Appendix G Dairy Calculations

Rev. January 6, 2020

Pre-Project Facility Information



5. Is any scraped manure sent to a lagoon/storage pond? Answering "yes" assumes worst case.

	Pre-Project Herd Size						
Herd	Flushed Freestalls	Scraped Freestalls	Flushed Corrals	Scraped Corrals	Total # of Animals		
Milk Cows	1,420				1,420		
Dry Cows	225				225		
Support Stock (Heifers, Calves, and Bulls)	1,300				1,300		
Large Heifers					0		
Medium Heifers					0		
Small Heifers					0		
Bulls					0		
		Calf Huto	ches		Calf C	orrals	
	Aboveground Flushed	Aboveground Scraped	On-Ground Flushed	On-Ground Scraped	Flushed	Scraped	Total # of Calves
Calves							0

Total Herd S	ummary
Total Milk Cows	1,420
Total Mature Cows	1,645
Support Stock (Heifers, Calves, and Bulls)	1,300
Total Calves	0
Total Dairy Head	2,945

Pre-Project Silage Information						
Feed Type Max # <u>Open</u> Piles Max Height (ft) Max Width (ft)						
Corn	1	20	100			
Alfalfa						
Wheat	1	20	100			

Post-Project Facility Information

1.	Does this facility house Holstein or Jersey cows? Most facilities house Holstein cows unless explicitly stated on the F	Holstein TO or application.
2.	Does the facility have an <u>anaerobic</u> treatment lagoon?	no
3.	Does the facility land apply liquid manure? Answering "yes" assumes worst case.	yes
4.	Does the facility land apply solid manure? Answering "yes" assumes worst case.	yes

5. Is any scraped manure sent to a lagoon/storage pond? yes Answering "yes" assumes worst case.

6. Does this project result in an increase or relocation of uncovered surface area for any lagoon/storage pond?

	Post-Project Herd Size					
Herd	Flushed Freestalls	Scraped Freestalls	Flushed Corrals	Scraped Corrals	Total # of Animals	
Milk Cows	1,420				1,420	
Dry Cows	225				225	
upport Stock (Heifers, Calves, and Bulls)	1,300				1,300	
Large Heifers					0	
Medium Heifers					0	
Small Heifers					0	
Bulls					0	
		Calf Huto	ches		Calf C	orrals
	Aboveground Flushed	Aboveground Scraped	On-Ground Flushed	On-Ground Scraped	Flushed	Scraped
Calves						

no

Total Herd Summary				
Total Milk Cows	1,420			
Total Mature Cows	1,645			
Support Stock (Heifers, Calves, and Bulls)	1,300			
Total Calves	0			
Total Dairy Head	2,945			

Post-Project Silage Information							
Feed Type Max # <u>Open</u> Piles Max Height (ft) Max Width (ft)							
Corn	1	20	100				
Alfalfa							
Wheat	1	20	100				

This spreadsheet serves only as a resource to calculate potential emissions from dairies, and may not reflect the final emissions used by the District due to parameters not addressed in this spreadsheet and/or omissions from the spreadsheet. Any other permittable equipment (e.g. IC engines, gasoline tanks, etc.) at a facility will need to be calculated separately. All final calculations used in permitting projects will be conducted by District staff.

VOC Mitigation Measures and Control Efficiencies

	Milking Parlor					
Measure F	Proposed?	Mitigation Measure(s) per Emissions Point		VOC Control Efficiency (%)		
Pre-Project	Post-Project	Miligation Measure(s) per Emissions Point	Pre-Project	Post-Project		
		Enteric Emissions Mitigations				
	V	(D) Feed according to NRC guidelines	10%	10%		
	Total Control Efficiency			10%		
		Milking Parlor Floor Mitigations				
	Image: A state of the state	(D) Feed according to NRC guidelines	10%	10%		
	V	(D) Flush or hose milk parlor immediately prior to, immediately after, or during each milking. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF.	0%	0%		
		Total Control Efficiency	10%	10%		

Measure	Proposed?	Cow Housing	VOC Control Efficiency (%)		
Pre-Project	Post-Project	Mitigation Measure(s) per Emissions Point	Pre-Project	Post-Project	
FIE-FIOJECI	FOSt-FT0ject	Enteric Emissions Mitigations	FIE-FI0ject		
		Feed according to NRC guidelines	10%	10%	
<u> </u>		Total Control Efficiency	10 %	10%	
		Corrals/Pens Mitigations	10%	10%	
v		Feed according to NRC guidelines	10%	10%	
<u> </u>			1076	1076	
V	V	Inspect water pipes and troughs and repair leaks at least once every seven days. Note: If selected for dairies > 999 milk cows, CE is already included in EF.	0%	0%	
V		Dairies: Clean manure from corrals at least four times per year with at least 60 days between cleaning, or clean corrals at least once between April and July and at least once between September and December. Note: If selected for dairies > 999 milk cows, CE is already included in EF. Note: No additional control given for increased cleaning frequency (e.g. BACT requirement). Heifer/Calf Ranches: Scrape corrals twice a year with at least 90 days between cleaning, excluding in-corral mounds. Note: No additional control given for increased cleaning frequency (e.g. BACT requirement).	0%	0%	
V		Scrape, vacuum, or flush concrete lanes in corrals at least once every day for mature cows and every seven days for support stock, or clean concrete lanes such that the depth of manure does not exceed 12 inches at any point or time. Note: No additional control given for increased cleaning frequency (e.g. BACT requirement).	10%	10%	
Ø	V	Implement one of the following: 1) slope the surface of the corrals at least 3% where the available space for each animal is 400 sq ft or less and slope the surface of the corrals at least 1.5% where the available space for each animal is more than 400 sq ft; 2) maintain corrals to ensure proper drainage preventing water from standing more than 48 hrs; 3) harrow, rake, or scrape pens sufficiently to maintain a dry surface. Note: If selected for dairies > 999 milk cows, CE already included in EF.	0%	0%	
V		Install shade structures such that they are constructed with a light permeable roofing material. Note: If selected for dairies > 999 milk cows, the control efficiency will be 5% since the EF used includes a partial control for this measure.			
	Ø	Install all shade structures uphill of any slope in the corral. Note: If selected for dairies > 999 milk cows, the control efficiency will be 5% since the EF used includes a partial control for this measure.			
		Clean manure from under corral shades at least once every 14 days, when weather permits access into corral. Note: If selected for dairies > 999 milk cows, the control efficiency will be 5% since the EF used includes a partial control for this measure.	5%	5%	
		Install shade structure so that the structure has a North/South orientation. Note: If selected for dairies > 999 milk cows, the control efficiency will be 5% since the EF used includes a partial control for this measure.			
V		Manage corrals such that the manure depth in the corral does not exceed 12 inches at any time or point, except for in-corral mounding. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. The manure facility must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF.	0%	0%	
		Knockdown fence line manure build-up prior to it exceeding a height of 12 inches at any time or point. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. The facility must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible.	0%	0%	
		Use lime or a similar absorbent material in the corral according to the manufacturer's recommendation to minimize moisture in the corrals.	0%	0%	
		Apply thymol to the corral soil in accordance with the manufacturer's recommendation.	0%	0%	
		Total Control Efficiency	23.05%	23.05%	
		Bedding Mitigations	20.0070	23.03%	
		Feed according to NRC guidelines	10%	10%	
			1070	1070	
		Use non-manure-based bedding and non-separated solids based bedding for at least 90% of the bedding material, by weight, for freestalls (e.g. rubber mats, almond shells, sand, or waterbeds).	0%	0%	

V	V	For a large dairy (1,000 milk cows or larger) or a heifer/calf ranch - Remove manure that is not dry from individual cow freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 7	100/	
		days.	10%	10%
		(D) For a medium dairy only (500 to 999 milk cows) - Remove manure that is not dry from individual cow freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 14 days.		
		neestali beus of rake, narrow, scrape, of grade neestali beduling at least once every 14 days.	0%	0%
		Total Control Efficiency	19.00%	19.00%
		Lanes Mitigations		
		Feed according to NRC guidelines	10%	10%
V	V	Pave feedlanes, where present, for a width of at least 8 feet along the corral side of the feedlane fence for milk and dry cows and at least 6 feet along the corral side of the feedlane for heifers. Note: No control efficiency at this time.	0%	0%
V		Dairies: Flush, scrape, or vacuum freestall flush lanes immediately prior to or after, or during each milking; or flush or scrape freestall flush lanes at least 3 times per day. <u>Heifer/Calf Ranches</u> : Vacuum, scrape, or flush freestalls at least once every seven days.	10%	10%
		(D) Have no animals in exercise pens or corrals at any time.	0%	0%
		Total Control Efficiency	19.00%	19.00%

		Liquid Manure Handling				
Measure F	Proposed?	Mitigation Measure(s) per Emissions Point	VOC Control Efficiency (%			
Pre-Project	Post-Project		Pre-Project	Post-Project		
		Lagoons/Storage Ponds Mitigations				
		Feed according to NRC guidelines	10%	10%		
		Use phototropic lagoon	0%	0%		
		Use an anaerobic treatment lagoon designed according to NRCS Guideline No. 359, or aerobic treatment lagoon, or mechanically aerated lagoon, or covered lagoon digester vented to a control device with minimum 95% control	0%	0%		
	V	Remove solids from the waste system with a solid separator system, prior to the waste entering the lagoon. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF.	0%	0%		
		Maintain lagoon pH between 6.5 and 7.5	0%	0%		
		Total Control Efficiency	10.00%	10.00%		
		Liquid Manure Land Application Mitigations				
	Image: A start of the start	Feed according to NRC guidelines	10%	10%		
		Only apply liquid manure that has been treated with an anaerobic or aerobic treatment lagoon, aerobic lagoon, or digester system	0%	0%		
V	V	Allow liquid manure to stand in the fields for no more than 24 hours after irrigation. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF.	ote: If selected for 0% 0%			
		Apply liquid/slurry manure via injection with drag hose or similar apparatus	0%	0%		
		Total Control Efficiency	10.00%	10.00%		

		Solid Manure Handling							
Measure F	Proposed?	Mitigation Measure(s) per Emissions Point	VOC Control Efficiency (
Pre-Project	Post-Project	willigation weasure(s) per Emissions Point	Pre-Project	Post-Project					
		Solid Manure Storage Mitigations							
		Feed according to NRC guidelines	10%	10%					
	V	LARGE CAFO ONLY: Within 72 hours of removal from housing, either a) remove dry manure from the facility, or b) cover dry manure outside the housing with a weatherproof covering from October through May, except for times when wind events remove the covering, not to exceed 24 hours per event.	10%	10%					
	Total Control Efficiency								
		Separated Solids Piles Mitigations							
v	v	Feed according to NRC guidelines	10%	10%					
		LARGE CAFO ONLY: Within 72 hours of removal from the drying process, either a) remove separated solids from the facility, or b) cover separated solids outside the housing with a weatherproof covering from October through May, except for times when wind events remove the covering, not to exceed 24 hours per event.	0%	0%					
		Total Control Efficiency	10.00%	10.00%					
		Solid Manure Land Application Mitigations							
V	v	Feed according to NRC guidelines	10%	10%					
V		Incorporate all solid manure within 72 hours of land application. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF. Note: No additional control given for rapid manure incorporation (e.g. BACT requirement).	0%	0%					
		Only apply solid manure that has been treated with an anaerobic treatment lagoon, aerobic lagoon or digester system.	0%	0%					
		Apply no solid manure with a moisture content of more than 50%	0%	0%					
	·	Total Control Efficiency	10.00%	10.00%					

	Silage and TMR											
Measure F	vroposed?	Mitigation Measure(s) per Emissions Point	VOC Control Efficiency (%									
Pre-Project	Post-Project	miligation measure(s) per Ennissions Folint	Pre-Project	Post-Project								
		Corn/Alfalfa/Wheat Silage Mitigations										
		1. Utilize a sealed feed storage system (e.g. Ag-Bag) for bagged silage, or										

	Total Control Efficiency*	39.00%	39.00%
	For dairies - implement <u>two</u> of the following: For heifer/calf ranches - implement <u>one</u> of the following: <u>Manage Exposed Silage</u> . a) manage silage piles such that only one silage pile has an uncovered face and the uncovered face has a total exposed surface area of less than 2,150 sq. ft., or b) manage multiple uncovered silage piles such that the total exposed surface area of all silage piles is less than 4,300 sq ft. <u>Maintain Silage Working Face</u> . a) use a shaver/facer to remove silage from the silage pile, or b) maintain a smooth vertical surface on the working face of the silage pile <u>Silage Additive</u> : a) inoculate silage with homolactic acid bacteria in accordance with manufacturer recommendations to achieve a concentration of at least 100,000 colony forming units per gram of wet forage or apply proprionic acid, benzoic acid, sorbic acid, sodium benzoate, or potassium sorbate at a rate specified by the manufacturer to reduce yeast counts when forming silage pile; or b) apply other additives at specified rates that have been demonstrated to reduce alcohol concentrations in silage and/or VOC emissions from silage and have been approved by the District and EPA.	0.070	55.078
V	c) harvest silage crop at > or = 65% moisture for corn; and >= 60% moisture for alfalfa/grass and other silage crops; manage silage material delivery such that no more than 6 inches of materials are uncompacted on top of the pile; and incorporate the applicable Theoretical Length of Chop (TLC) and roller opening for the crop being harvested.	39.0%	39.0%
	 a) build silage piles such that the average bulk density is at least 44 lb/cu-ft for corn silage and 40 lb/cu-ft for other silage types, as measured in accordance with Section 7.10 of Rule 4570, b) when creating a silage pile, adjust filling parameters to assure a calculated average bulk density of at least 44 lb/cu-ft for corn silage and at least 40 lb/cu-ft for other silage types, using a spreadsheet approved by the District. 		
	2. Cover the surface of silage piles, except for the area where feed is being removed from the pile, with a plastic tarp that is at least 5 mils thick (0.005 inches), multiple plastic tarps with a cumulative thickness of at least 5 mils (0.005 inches), or an oxygen barrier film covered with a UV resistant material within 72 hours of last delivery of material to the pile, and implement one of the following:		

*Assumes 25% control for density mitigation measures and 10% each for the two optional measures, resulting in an overall control of 39%. The same conservative control efficiency will be applied to the sealed feed storage system (Ag-Bag).

		TMR Mitigations		
		(D) Push feed so that it is within 3 feet of feedlane fence within 2 hrs of putting out the feed or use a feed trough or other feeding structure designed to maintain feed within reach of the cows.	10%	10%
V		(D) Begin feeding total mixed rations within 2 hrs of grinding and mixing rations. Note: If selected for dairies > 999 milk cows, control efficiency already included in EF.	0%	0%
		Feed steam-flaked, dry rolled, cracked or ground corn or other ground cereal grains.	0%	0%
	V	Remove uneaten wet feed from feed bunks within 24 hrs after then end of a rain event.	10%	10%
		(D) For total mixed rations that contain at least 30% by weight of silage, feed animals total mixed rations that contain at least 45% moisture.	0%	0%
		Feed according to NRC guidelines. Note: If selected for dairies, control efficiency already included in EF.	0%	0%
		Total Control Efficiency	19.00%	19.00%

Ammonia Mitigation Measures and Control Efficiencies

	Milking Parlor										
Measure Proposed?		Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)							
Pre-Project	Post-Project	Witigation Measure(s) per Emissions Point	Pre-Project	Post-Project							
		Milking Parlor Floor Mitigations									
✓	V	Feed according to NRC guidelines	28%	28%							
		Total Control Efficiency	28%	28%							

Cow Housing									
Measure F	Proposed?	Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)					
Pre-Project	Post-Project	initigation measure(s) per Emissions Point	Pre-Project	Post-Project					
		Corrals/Pens Mitigations							
7		Feed according to NRC guidelines	28%	28%					
	V	Clean manure from corrals at least four times per year with at least 60 days between cleaning, or clean corrals at least once between April and July and at least once between September and December. OR Use lime or a similar absorbent material in the corral according to the manufacturer's recommendation to minimize moisture in the corrals. OR Apply thymol to the corral soil in accordance with the manufacturer's recommendation.	50%	50%					
		64%	64%						
		Bedding Mitigations							
7	V	Feed according to NRC guidelines	28%	28%					
		Use non-manure-based bedding and non-separated solids based bedding for at least 90% of the bedding material, by weight, for freestalls (e.g. rubber mats, almond shells, sand, or waterbeds). OR For a large dairy only (1,000 milk cows or larger) - Remove manure that is not dry from individual cow freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 7 days. OR For a medium dairy only (500 to 999 milk cows) - Remove manure that is not dry freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 14 days.	0.0%	0.0%					
		Total Control Efficiency	28.00%	28.00%					
		Lanes Mitigations							
		Feed according to NRC guidelines	28%	28%					
		Total Control Efficiency	28%	28%					

Liquid Manure Handling										
Measure F	Proposed?	Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)						
Pre-Project	Post-Project	initigation measure(s) per Emissions Point	Pre-Project	Post-Project						
		Lagoons/Storage Ponds Mitigations								
✓	✓	Feed according to NRC guidelines	28%	28%						
7	I IVI	Use phototropic lagoon OR Remove solids from the waste system with a solid separator system, prior to the waste entering the lagoon.	80%	80%						
		Total Control Efficiency	85.6%	85.6%						
		Liquid Manure Land Application Mitigations								
 Image: A set of the set of the	I	Feed according to NRC guidelines	28%	28%						
		Only apply liquid manure that has been treated with an anaerobic treatment lagoon	0%	0%						
		Total Control Efficiency	28.00%	28.00%						

Solid Manure Handling										
Measure F	Proposed?	Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)						
Pre-Project	Post-Project		Pre-Project	Post-Project						
		Solid Manure Land Application Mitigations								
✓	✓	Feed according to NRC guidelines	28%	28%						
		Incorporate all solid manure within 72 hours of land application. AND Only apply solid manure that has been treated with an anaerobic treatment lagoon, aerobic lagoon or digester system. AND Apply no solid manure with a moisture content of more than 50%	0%	0%						
		28.00%	28.00%							

Dairy Emission Factors

											lb/hd-	r Dairy E	missior	s Facto	rs for Ho	stein Co	ws													
				Milk C	Cows			Dry C	ows		Large	Heifers (1	5 to 24 mo	nths)	Medi	um Heifers	(7 to 14 mo	onths)	Sma	II Heifers (3 to 6 mon	ths)		Calves (0 -	3 months)		Bul	ls	
			Uncon	trolled	Contr	rolled	Uncon	trolled	Cont	rolled	Unco	ntrolled	Cont	rolled	Uncor	trolled	Cont	rolled	Uncor	trolled	Cont	rolled	Uncor	ntrolled	Cont	rolled	Uncon	trolled	Contr	rolled
			<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	21000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2
	voc	Enteric Emissions in Milking Parlors	0.43	0.41	0.37	0.37	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
Milking Parlor	VUC	Milking Parlor Floor	0.04	0.03	0.03	0.03		-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
-		Total	0.47	0.44	0.40	0.40	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
	NH3	Total	0.19	0.19	0.14	0.14	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
		Enteric Emissions in Cow Housing	3.89	3.69	3.32	3.32	2.33	2.23	2.01	2.01	1.81	1.71	1.54	1.54	1.23	1.17	1.05	1.05	0.69	0.65	0.58	0.58	0.32	0.31	0.28	0.28	1.10	1.04	0.94	0.94
	voc	Corrals/Pens	10.00	6.60	5.08	5.08	5.40	3.59	2.76	2.76	4.20	2.76	2.12	2.12	2.85	1.88	1.45	1.45	1.60	1.04	0.80	0.80	0.75	0.50	0.39	0.39	2.55	1.67	1.29	1.29
	VUC	Bedding	1.05	1.00	0.81	0.81	0.57	0.54	0.44	0.44	0.44	0.42	0.34	0.34	0.30	0.28	0.23	0.23	0.17	0.16	0.13	0.13	0.08	0.08	0.06	0.06	0.27	0.25	0.20	0.20
		Lanes	0.84	0.80	0.65	0.65	0.45	0.44	0.35	0.35	0.35	0.33	0.27	0.27	0.24	0.23	0.18	0.18	0.13	0.13	0.10	0.10	0.06	0.06	0.05	0.05	0.21	0.20	0.16	0.16
Cow Housing		Total	15.78	12.09	9.86	9.86	8.75	6.80	5.57	5.57	6.81	5.22	4.27	4.27	4.62	3.56	2.91	2.91	2.59	1.98	1.62	1.62	1.22	0.95	0.78	0.78	4.13	3.16	2.59	2.59
contributing		Enteric Emissions in Cow Housing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	NH3	Corrals/Pens	41.90	41.90	15.08	15.08	21.20	21.20	7.63	7.63	11.00	11.00	3.96	3.96	7.90	7.90	2.84	2.84	6.00	6.00	2.16	2.16	1.80	1.80	0.65	0.65	15.30	15.30	5.51	5.51
	NHS	Bedding	6.30	6.30	4.54	4.54	3.20	3.20	2.30	2.30	1.70	1.70	1.22	1.22	1.20	1.20	0.86	0.86	0.90	0.90	0.65	0.65	0.30	0.30	0.22	0.22	2.30	2.30	1.66	1.66
		Lanes	5.10	5.10	3.67	3.67	2.60	2.60	1.87	1.87	1.30	1.30	0.94	0.94	1.00	1.00	0.72	0.72	0.70	0.70	0.50	0.50	0.20	0.20	0.14	0.14	1.90	1.90	1.37	1.37
		Total	53.30	53.30	23.29	23.29	27.00	27.00	11.81	11.81	14.00	14.00	6.12	6.12	10.10	10.10	4.43	4.43	7.60	7.60	3.31	3.31	2.30	2.30	1.01	1.01	19.50	19.50	8.53	8.53
		Lagoons/Storage Ponds	1.52	1.30	1.17	1.17	0.82	0.71	0.64	0.64	0.64	0.54	0.49	0.49	0.43	0.37	0.33	0.33	0.24	0.21	0.19	0.19	0.11	0.10	0.09	0.09	0.40	0.33	0.30	0.30
	voc	Liquid Manure Land Application	1.64	1.40	1.26	1.26	0.89	0.76	0.69	0.69	0.69	0.58	0.53	0.53	0.47	0.40	0.36	0.36	0.26	0.22	0.20	0.20	0.12	0.11	0.10	0.10	0.42	0.35	0.32	0.32
Liquid Manure		Total	3.16	2.70	2.43	2.43	1.71	1.47	1.33	1.33	1.33	1.13	1.02	1.02	0.90	0.77	0.69	0.69	0.51	0.43	0.38	0.38	0.24	0.21	0.18	0.18	0.82	0.68	0.61	0.61
Handling		Lagoons/Storage Ponds	8.20	8.20	1.18	1.18	4.20	4.20	0.60	0.60	2.20	2.20	0.32	0.32	1.50	1.50	0.22	0.22	1.20	1.20	0.17	0.17	0.35	0.35	0.05	0.05	3.00	3.00	0.43	0.43
	NH3	Liquid Manure Land Application	8.90	8.90	6.41	6.41	4.50	4.50	3.24	3.24	2.30	2.30	1.66	1.66	1.70	1.70	1.22	1.22	1.30	1.30	0.94	0.94	0.37	0.37	0.27	0.27	3.23	3.23	2.33	2.33
		Total	17.10	17.10	7.59	7.59	8.70	8.70	3.84	3.84	4.50	4.50	1.97	1.97	3.20	3.20	1.44	1.44	2.50	2.50	1.11	1.11	0.72	0.72	0.32	0.32	6.23	6.23	2.76	2.76
		Solid Manure Storage	0.16	0.15	0.12	0.12	0.09	0.08	0.07	0.07	0.07	0.06	0.05	0.05	0.05	0.04	0.03	0.03	0.03	0.02	0.02	0.02	0.01	0.01	0.01	0.01	0.04	0.04	0.03	0.03
		Separated Solids Piles	0.06	0.06	0.05	0.05	0.03	0.03	0.03	0.03	0.03	0.03	0.02	0.02	0.02	0.02	0.02	0.02	0.01	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.02	0.02	0.02	0.02
	voc	Solid Manure Land Application	0.39	0.33	0.30	0.30	0.21	0.18	0.16	0.16	0.16	0.14	0.12	0.12	0.11	0.09	0.08	0.08	0.06	0.05	0.05	0.05	0.03	0.03	0.02	0.02	0.10	0.08	0.07	0.07
Solid Manure		Total	0.61	0.54	0.47	0.47	0.33	0.29	0.26	0.26	0.26	0.23	0.20	0.20	0.17	0.15	0.13	0.13	0.10	0.09	0.07	0.07	0.05	0.04	0.04	0.04	0.16	0.14	0.12	0.12
Handling		Solid Manure Storage	0.95	0.95	0.95	0.95	0.48	0.48	0.48	0.48	0.25	0.25	0.25	0.25	0.18	0.18	0.18	0.18	0.13	0.13	0.13	0.13	0.04	0.04	0.04	0.04	0.35	0.35	0.35	0.35
		Separated Solids Piles	0.38	0.38	0.38	0.38	0.19	0.19	0.19	0.19	0.10	0.10	0.10	0.10	0.07	0.07	0.07	0.07	0.05	0.05	0.05	0.05	0.02	0.02	0.02	0.02	0.14	0.14	0.14	0.14
	NH3	Solid Manure Land Application	2.09	2.09	1.50	1.50	1.06	1.06	0.76	0.76	0.55	0.55	0.40	0.40	0.39	0.39	0.28	0.28	0.30	0.30	0.22	0.22	0.09	0.09	0.06	0.06	0.76	0.76	0.55	0.55
		Total	3.42	3.42	2.83	2.83	1.73	1.73	1.43	1.43	0.90	0.90	0.75	0.75	0.64	0.64	0.53	0.53	0.48	0.48	0.40	0.40	0.15	0.15	0.12	0.12	1.25	1.25	1.04	1.04

Silage and TMR (Total Mixed Ration) Emissions (µg/m^2-min)									
Silage Type Uncontrolled EF1									
		Corn Silage	34,681	21,155	21,155				
Feed Storage and	VOC	Alfalfa Silage	17,458	10,649	10,649				
Handling	VUC	Wheat Silage	43,844	26,745	26,745				
		TMR	13,056	10,575	10,575				

Assumptions: 1) Each silage pile is completely covered except for the front face and 2) Rations are fed within 48 hours.

	PM ₁₀ Emission Factors (Ib/hd-yr)										
Type of Cow	Dairy EF	Source									
Cows in Freestalls	1.37	Based on a Summer 2003 study by Texas A&M ASAE at a West Texas Dairy									
Milk/Dry in Loafing Barns	2.73	SJVAPCD									
Heifers/Bulls in Loafing Barns	5.28	SJVAPCD									
Calves in Loafing Barns	0.69	SJVAPCD									
Milk/Dry in Corrals	5.46	Based on a Summer 2003 study by Texas A&M ASAE at a West Texas Dairy									
Support Stock (Heifers/Bulls) in Open Corrals	10.55	Based on a USDA/UC Davis report quantifying dairy and feedlot emissions in Tulare & Kern Counties (April '01)									
Large Heifers in Open Corrals	8.01	SJVAPCD									
Calf (under 3 mo.) open corrals	1.37	SJVAPCD									
Calf on-ground hutches	0.343	SJVAPCD									
Calf above-ground flushed	0.069	SJVAPCD									
Calf above-ground scraped	0.206	SJVAPCD									

The controlled PM10 EF will be calculated based on the specific PM10 mitigation measures, if any, for each freestall, corral, or calf hutch area. See the PM Mitigation Measures for calculations.

PM10 Mitigation Measures and Control Efficiencies

Control Measure	PM10 Control Efficiency
Shaded corrals (milk and dry cows)	16.7%
Shaded corrals (heifers and bulls)	8.3%
Downwind shelterbelts	12.5%
Upwind shelterbelts	10%
Freestall with no exercise pens and non-manure based bedding	90%
Freestall with no exercise pens and manure based bedding	80%
Fibrous layer in dusty areas (i.e. hay, etc.)	10%
Bi-weekly corral/exercise pen scraping and/or manure removal using a pull type manure harvesting equipment in morning hours when moisture in air except during periods of rainy weather	15%
Sprinkling of open corrals/exercise pens	12.5%
Feeding young stock (heifers and calves) near dusk	10%

Pre-Project PM10 Mitigation Measures

[Pre	-Project PM	10 Mitigation I	Measures						
	Housing Name(s) or #(s)	Type of Housing	Type of cow	Total # of cows in Each Housing Structure(s)	Capacity of Each	# of Combined Housing Structures in row	Shaded Corrals	Downwind Shelterbelts	Upwind Shelterbelts	No exercise pens, non-manure bedding	No exercise pens, manure bedding	Fibrous layer	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk
1	milk	open corral	milk cows	1420	1420	1									
2	dry	open corral	dry cows	225	225	1									
3	support	open corral	support stock	1300	1300	1									
		Pre-Pro	ject Total # of Cows	2,945											

ĺ							Pre-Project	PM10 Control	Efficiencies and	d Emission Factors						
	Housing Name(s) or #(s)	Type of Housing	Type of cow		Maximum Design Capacity of <u>Each</u> Structure	Uncontrolled EF (lb/hd-yr)	Shaded Corrals	Downwind Shelterbelts	Upwind Shelterbelts	No exercise pens, non-manure bedding	No exercise pens, manure bedding	Fibrous layer	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk	Controlled EF (lb/hd-yr)
1	milk	open corral	milk cows	1420	1420	5.460										5.46
2	dry	open corral	dry cows	225	225	5.460										5.46
3	support	open corral	support stock	1300	1300	10.550										10.55

Post-Project PM10 Mitigation Measures

ĺ						Pos	t-Project PN	110 Mitigation	Measures						
	Housing Name(s) or #(s)	Type of Housing	Type of cow	Total # of cows in Each Housing Structure(s)	Capacity of Each	# of Combined Housing Structures in row	Shaded Corrals	Downwind Shelterbelts	Upwind Shelterbelts	No exercise pens, non-manure bedding	No exercise pens, manure bedding	Fibrous layer	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk
1	milk	open corral	milk cows	1420	1420	1									
2	dry	open corral	dry cows	225	225	1									
3	support	open corral	support stock	1300	1300	1									
		Post-Pro										-			

							Post-Projec	t PM10 Contro	Efficiencies an	d Emission Factors						
	Housing Name(s) or #(s)	Type of Housing	Type of cow	Total # of cows in Each Housing Structure(s)	Maximum Design Capacity of <u>Each</u> Structure	Uncontrolled EF (lb/hd-yr)	Shaded Corrals	Downwind Shelterbelts	Upwind Shelterbelts	No exercise pens, non-manure bedding	No exercise pens, manure bedding	Eibrous laver	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk	Controlled EF (lb/hd-yr)
1	milk	open corral	milk cows	1420	1420	5.460										5.46
2	dry	open corral	dry cows	225	225	5.460										5.46
3	support	open corral	support stock	1300	1300	10.550										10.55

Pre-Project Potential to Emit - Cow Housing

				Р	re-Project Pot	ential to Emit - C	ow Housing					
	Housing Name(s) or #(s)	Type of Cow	# of Cows	Controlled VOC EF (lb/hd-yr)	Controlled NH3 EF (lb/hd-yr)	Controlled PM10 EF (lb/hd-yr)	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)
1	milk	milk cows	1,420	9.86	23.29	5.46	38.4	14,001	90.6	33,075	21.2	7,753
2	dry	dry cows	225	5.57	11.81	5.46	3.4	1,253	7.3	2,657	3.4	1,229
3	support	support stock	1,300	4.27	6.12	10.55	15.2	5,551	21.8	7,956	37.6	13,715
	Pre-Project Total # of Cows 2,945						57.0	20,805	119.7	43,688	62.2	22,697

*Multiple emissions units (freestalls, corrals, calf hutch areas, etc.) are combined in these rows.

	Pre-Project Totals												
Total # of Cows	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)							
2,945	57.0	20,805	119.7	43,688	62.2	22,697							

Calculations:

Annual PE 1 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE1 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

Post-Project Potential to Emit - Cow Housing

		Post-Project Potential to Emit - Cow Housing													
	Housing Name(s) or #(s)	Type of Cow	# of Cows	Controlled VOC EF (lb/hd-yr)	Controlled NH3 EF (lb/hd-yr)	Controlled PM10 EF (lb/hd-yr)	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)			
1	milk	milk cows	1,420	9.86	23.29	5.46	38.4	14,001	90.6	33,075	21.2	7,753			
2	dry	dry cows	225	5.57	11.81	5.46	3.4	1,253	7.3	2,657	3.4	1,229			
3	support	support stock	1,300	4.27	6.12	10.55	15.2	5,551	21.8	7,956	37.6	13,715			
	Post-Project # of Cow	s (non-expansion)	2,945				57.0	20,805	119.7	43,688	62.2	22,697			

*Multiple emissions units (freestalls, corrals, calf hutch areas, etc.) are combined in these rows.

		Pos	st-Project Totals	6		
Total # of Cows	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)
2,945	57.0	20,805	119.7	43,688	62.2	22,697

Calculations:

Annual PE 2 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE2 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

Pre-Project Worst Case BACT Calculations - Cow Housing

This table uses the worst case emission factor for each cow type and the maximum design capacity of the housing unit. This should only be used for BACT calculation

					purpo	ses.						
				Worst-Case Pre	e-Project Pote	ntial to Emit - C	Cow Housi	ing				
	Housing Name(s) or #(s)	Type of Cow	Capacity per housing unit	Controlled VOC EF (lb/hd-yr)	Controlled NH3 EF (lb/hd-yr)	Controlled PM10 EF (lb/hd-yr)	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)
1	milk	milk cows	1420	9.86	23.29	10.55	38.4	14,001	90.6	33,075	41.0	14,981
2	dry	dry cows	225	9.86	23.29	10.55	6.1	2,219	14.4	5,241	6.5	2,374
3	support	support stock	1300	9.86	23.29	10.55	35.1	12,818	83.0	30,280	37.6	13,715
							79.6	29.038	188.0	68 596	85.1	31 070

*Multiple emissions units (freestalls, corrals, calf hutch areas, etc.) are combined in these rows. BACT applicability has been calculated for EACH emissions unit in this row.

	Pre-Project Totals													
VOC (lb/day) VOC (lb/yr) NH3 (lb/day) NH3 (lb/yr) PM10 (lb/day) PM10 (lb/yr)														
79.6	29,038	188.0	68,596	85.1	31,070									

Calculations:

Annual PE 1 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE1 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

Post-Project Worst Case BACT Calculations - Existing Cow Housing

This table uses the worst case emission factor for each cow type and the maximum design capacity of the housing unit. This should only be used for BACT calculation purposes.

						Post-Project V	Vorst Case	BACT Cal	culations -	Existing (Cow Housi	ng						
	Housing Name(s) or #(s)	Type of Cow	Capacity per housing unit	Controlled VOC EF (lb/hd-yr)	Controlled NH3 EF (lb/hd-yr)	Controlled PM10 EF (lb/hd-yr)	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (Ib/yr)	PM10 (lb/day)	PM10 (lb/yr)	VOC AIPE	NH3 AIPE	PM10 AIPE	BACT Triggered for VOC?	BACT Triggered for NH3?	BACT Triggered for PM10?
1	milk	milk cows	1420	9.86	23.29	10.55	38.4	14,001	90.6	33,075	41.0	14,981	0.0	0.0	0.0	No	No	No
2	dry	dry cows	225	9.86	23.29	10.55	6.1	2,219	14.4	5,241	6.5	2,374	0.0	0.0	0.0	No	No	No
3	support	support stock	1300	9.86	23.29	10.55	35.1	12,818	83.0	30,280	37.6	13,715	0.0	0.0	0.0	No	No	No
							79.6	29,038	188.0	68,596	85.1	31,070						-

*Multiple emissions units (freestalls, corrals, calf hutch areas, etc.) are combined in these rows. BACT applicability has been calculated for EACH emissions unit in this row.

Calculations:

Annual PE 2 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE2 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

Post-Project Totals								
VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)			
79.6	29,038	188.0	68,596	85.1	31,070			

Calculations:

Annual PE 2 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE2 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

BACT Applicability

Milking Parlor								
	VOC Emissions							
	PE2 (lb/day) PE1 (lb/day) EF2 EF1 AIPE (lb/day							
Milk Cows	1.6	1.6	0.40	0.40	0.0			
	Total							
	N	13 Emissions						
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)			
Milk Cows	0.5	0.5	0.14	0.14	0.0			
Total								

Cow Housing	
See detailed cow housing AIPE calculations on the BACT Calcs page.	

	Liquid I	Manure Hand	ling		
v	OC Emissions	- Lagoon/Stora	ige Pond(s)		
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	4.6	4.6	1.17	1.17	0.0
Dry Cows	0.4	0.4	0.64	0.64	0.0
Support Stock (Heifers, Calves, and Bulls)	1.7	1.7	0.49	0.49	0.0
Large Heifers	0.0	0.0	0.49	0.49	0.0
Medium Hefiers	0.0	0.0	0.33	0.33	0.0
Small Heifers	0.0	0.0	0.19	0.19	0.0
Calves	0.0	0.0	0.09	0.09	0.0
Bulls	0.0	0.0	0.30	0.30	0.0
				Total	0.0
	VOC Emissi	ons - Land App	lication		
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	4.9	4.9	1.26	1.26	0.0
Dry Cows	0.4	0.4	0.69	0.69	0.0
Support Stock (Heifers, Calves, and Bulls)	1.9	1.9	0.53	0.53	0.0
Large Heifers	0.0	0.0	0.53	0.53	0.0
Medium Hefiers	0.0	0.0	0.36	0.36	0.0
Small Heifers	0.0	0.0	0.36	0.36	0.0
Calves	0.0	0.0	0.20	0.20	
Bulls					0.0
Bulls	0.0	0.0	0.32	0.32	0.0
				Total	0.0
N		- Lagoon/Stora			-
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	4.6	4.6	1.18	1.18	0.0
Dry Cows	0.4	0.4	0.60	0.60	0.0
Support Stock (Heifers, Calves, and Bulls)	1.1	1.1	0.32	0.32	0.0
Large Heifers	0.0	0.0	0.32	0.32	0.0
Medium Hefiers	0.0	0.0	0.22	0.22	0.0
Small Heifers	0.0	0.0	0.17	0.17	0.0
Calves	0.0	0.0	0.05	0.05	0.0
Bulls	0.0	0.0	0.43	0.43	0.0
				Total	0.0
	NH3 Emissi	ons - Land App	lication		
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	24.9	24.9	6.41	6.41	0.0
Dry Cows	2.0	2.0	3.24	3.24	0.0
Support Stock (Heifers, Calves, and Bulls)	5.9	5.9	1.66	1.66	0.0
Large Heifers	0.0	0.0	1.66	1.66	0.0
Medium Hefiers	0.0	0.0	1.00	1.00	0.0
Small Heifers	0.0	0.0	0.94	0.94	0.0
Calves	0.0	0.0	0.94	0.94	0.0
Bulls					
Bulls	0.0	0.0	2.33	2.33	0.0
				Total	0.0
H		- Lagoon/Stora			
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	0.5	0.5	0.12	0.12	0.0
Dry Cows	0.0	0.0	0.06	0.06	0.0
Support Stock (Heifers, Calves, and Bulls)	0.1	0.1	0.03	0.03	0.0
Large Heifers	0.0	0.0	0.03	0.03	0.0
Medium Hefiers	0.0	0.0	0.02	0.02	0.0
Small Heifers	0.0	0.0	0.02	0.02	0.0
Calves	0.0	0.0	0.01	0.01	0.0
Bulls	0.0	0.0	0.04	0.04	0.0
				Total	0.0

Solid Manure Handling									
VOC Emiss	VOC Emissions - Solid Manure Storage/Separated Solids Piles								
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)				
Milk Cows	0.7	0.7	0.18	0.18	0.0				
Dry Cows	0.1	0.1	0.10	0.10	0.0				
Support Stock (Heifers, Calves, and Bulls)	0.3	0.3	0.10	0.07	0.0				
Large Heifers	0.0	0.0	0.07	0.07	0.0				
Medium Hefiers	0.0	0.0	0.05	0.05	0.0				
Small Heifers	0.0	0.0	0.03	0.03	0.0				
Calves	0.0	0.0	0.01	0.01	0.0				
Bulls	0.0	0.0	0.05	0.05	0.0				
				Total	0.0				
	VOC Emissio	ons - Land Appl	ication						
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)				
Milk Cows	1.2	1.2	0.30	0.30	0.0				
Dry Cows	0.1	0.1	0.16	0.16	0.0				
Support Stock (Heifers, Calves, and Bulls)	0.4	0.4	0.12	0.12	0.0				
Large Heifers	0.0	0.0	0.12	0.12	0.0				
Medium Hefiers	0.0	0.0	0.08	0.08	0.0				
Small Heifers	0.0	0.0	0.05	0.05	0.0				
Calves	0.0	0.0	0.02	0.02	0.0				
Bulls	0.0	0.0	0.07	0.07	0.0				
				Total	0.0				
NH3 Emissi	ions - Solid Ma	nure Storage/Se	parated Solid	s Piles	•				
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)				
Milk Cows	5.2	5.2	1.33	1.33	0.0				
Dry Cows	0.4	0.4	0.67	0.67	0.0				
Support Stock (Heifers, Calves, and Bulls)	1.2	1.2	0.35	0.35	0.0				
Large Heifers	0.0	0.0	0.35	0.35	0.0				
Medium Hefiers	0.0	0.0	0.25	0.25	0.0				
Small Heifers	0.0	0.0	0.18	0.18	0.0				
Calves	0.0	0.0	0.06	0.06	0.0				
Bulls	0.0	0.0	0.49	0.49	0.0				
				Total	0.0				
		ons - Land Appli			-				
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)				
Milk Cows	5.9	5.9	1.50	1.50	0.0				
Dry Cows	0.5	0.5	0.76	0.76	0.0				
Support Stock (Heifers, Calves, and Bulls)	1.4	1.4	0.40	0.40	0.0				
Large Heifers	0.0	0.0	0.40	0.40	0.0				
Medium Hefiers	0.0	0.0	0.28	0.28	0.0				
Small Heifers	0.0	0.0	0.22	0.22	0.0				
Calves	0.0	0.0	0.06	0.06	0.0				
Bulls	0.0	0.0	0.55	0.55	0.0				
				Total	0.0				

	Feed Storage and Handling									
VOC Emissions - Silage										
	PE2 (lb/day) PE1 (lb/day) EF2 EF1 AIPE (lb/day)									
Corn Silage	9.4	9.4	21,155	21,155	0.0					
Alfalfa Silage	0.0	0.0	10,649	10,649	0.0					
Wheat Silage	11.9	11.9	26,745	26,745	0.0					
				Total	0.0					
	VOC E	missions - TMR								
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)					
TMR	64.9	64.9	10,575	10,575	0.0					
				Total	0.0					

Pre-Project Potential to Emit (PE1)

	Pre-Project Herd Size							
Herd	Flushed Freestalls	Scraped Freestalls	Flushed Corrals	Scraped Corrals	Total # of Animals			
Milk Cows	1,420	0	0	0	1,420			
Dry Cows	225	0	0	0	225			
Support Stock (Heifers, Calves and Bulls)	1,300	0	0	0	1,300			
Large Heifers	0	0	0	0	0			
Medium Heifers	0	0	0	0	0			
Small Heifers	0	0	0	0	0			
Bulls	0	0	0	0	0		_	
		Calf Hu	tches		Calf C	orrals		
	Aboveground Flushed	Aboveground Scraped	On-Ground Flushed	On-Ground Scraped	Flushed	Scraped	Total # of Ca	
Calves	0	0	0	0	0	0	0	

Silage Information								
Feed Type	ed Type Maximum # Open Piles Maximum Height (ft) Maximum Width (ft) Open Face Area (ft^2							
Corn	1	20	100	1,514				
Alfalfa	0	0	0					
Wheat	1	20	100	1,514				

Milking Parlor								
Cow	V	OC	NH3					
Milk Cows	lb/day	lb/yr	lb/day	lb/yr				
WIIK COWS	1.6	568	0.5	194				

Cow Housing								
Cow	VOC		NH3		PM10			
cow	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr		
Total	57.0	20,805	119.7	43,688	62.2	22,697		

Liquid Manure Handling								
Cow	V	OC	NE	13	H2S*			
COW	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr		
Milk Cows	9.5	3,451	29.5	10,778	0.5	168		
Dry Cows	0.8	299	2.4	864	0	14		
Support Stock (Heifers, Calves and Bulls)	3.6	1,326	7.0	2,561	0.1	41		
Large Heifers	0.0	0	0.0	0	0	0		
Medium Heifers	0.0	0	0.0	0	0	0		
Small Heifers	0.0	0	0.0	0	0	0		
Calves	0.0	0	0.0	0	0	0		
Bulls	0.0	0	0.0	0	0	0		
Total	13.9	5,076	38.9	14,203	0.6	222		

Solid Manure Handling								
Cow	V	OC	NH	13				
cow	lb/day	lb/yr	lb/day	lb/yr				
Milk Cows	1.8	667	11.0	4,019				
Dry Cows	0.2	59	0.9	322				
Support Stock (Heifers, Calves and Bulls)	0.7	260	2.7	975				
Large Heifers	0.0	0	0.0	0				
Medium Heifers	0.0	0	0.0	0				
Small Heifers	0.0	0	0.0	0				
Calves	0.0	0	0.0	0				
Bulls	0.0 0		0.0	0				
Total	2.7	986	14.6	5,315				

Feed Handling and Storage								
	Daily PE (lb-VOC/day) Annual PE (lb-VOC/y							
Corn Emissions	9.4	3,441						
Alfalfa Emissions	0.0	0						
Wheat Emissions	11.9	4,350						
TMR	64.9	23,697						
Total 86.2 31,488								

Total Daily Pre-Project Potential to Emit (lb/day)										
Permit	NOx	SOx	PM10	CO	VOC	NH3	H2S			
Milking Parlor	0.0	0.0	0.0	0.0	1.6	0.5	0.0			
Cow Housing	0.0	0.0	62.2	0.0	57.0	119.7	0.0			
Liquid Manure	0.0	0.0	0.0	0.0	13.9	38.9	0.6			
Solid Manure	0.0	0.0	0.0	0.0	2.7	14.6	0.0			
Feed Handling	0.0	0.0	0.0	0.0	86.2	0.0	0.0			
Total	0.0	0.0	62.2	0.0	161.4	173.7	0.6			

Total Annual Pre-Project Potential to Emit (lb/yr)										
Permit	NOx	SOx	PM10	CO	VOC	NH3	H2S			
Milking Parlor	0	0	0	0	568	194	0			
Cow Housing	0	0	22,697	0	20,805	43,688	0			
Liquid Manure	0	0	0	0	5,076	14,203	222			
Solid Manure	0	0	0	0	986	5,315	0			
Feed Handling	0	0	0	0	31,488	0	0			
Total	0	0	22,697	0	58,923	63,400	222			

Calculations for milking parlor:

Annual PE = (# milk cows) x (EF1 lb-pollutant/hd-yr)

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calculations for cow housing:

See detailed calculations under Cow Housing Calculations worksheet.

Calculations for liquid manure and solid manure handling:

- Annual PE = [(# milk cows) x (EF1 lb-pollutant/hd-yr)] + [(# dry cows) x (EF1 lbpollutant/hd-yr)] + [(# large heifers) x (EF1 lb-pollutant/hd-yr)] + [(# medium heifers) x (EF1 lb-pollutant/hd-yr)] + [(# small heifers) x (EF1 lb-pollutant/hd-yr)] + [(# calves) x (EF1 lb-pollutant/hd-yr)] + [(# bulls) x (EF1 lb-pollutant/hd-yr)]
- Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

The H2S emission factor is assumed to be 10% of the NH3 lagoon/storage pond(s) emission factor, for each respective herd size.

Calculations for silage emissions:

Annual PE = (EF1) x (area ft²) x (0.0929 m²/ft²) x (8,760 hr/yr) x (60 min/hr) x 2.20E-9 lb/µg

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calculation for TMR emissions:

Annual PE = (# cows) x (EF1) x (0.658 m²) x (525,600 min/yr) x (2.20E-9 lb/µg)

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Galves are not included in TMR calculation.

*Since there will be no change to the lagoons/storage ponds surface area, no change in H2S emissions is expected. Therefore, it will be assumed that PE1 for H2S emissions is equal to PE2 for H2S emissions.

Major Source Emissions (lb/yr)											
Permit NOx SOx PM10 CO VOC											
Milk Parlor	0	0	0	0	0						
Cow Housing	0	0	0	0	0						
Liquid Manure	0	0	0	0	2,442						
Solid Manure	0	0	0	0	0						
Feed Handling	0	0	0	0	0						
Total	0	0	0	0	2,442						

Post-Project Potential to Emit (PE2)

	Post-Project Herd Size							
Herd	Flushed Freestalls	Scraped Freestalls	Flushed Corrals	Scraped Corrals	Total # of Animals			
Milk Cows	1,420	0	0	0	1,420			
Dry Cows	225	0	0	0	225			
Support Stock (Heifers, Calves, and Bulls)	1,300	0	0	0	1,300			
Large Heifers	0	0	0	0	0			
Medium Heifers	0	0	0	0	0			
Small Heifers	0	0	0	0	0			
Bulls	0	0	0	0	0		_	
		Calf Hu	tches		Calf C	orrals		
	Aboveground Flushed	Aboveground Scraped	On-Ground Flushed	On-Ground Scraped	Flushed	Scraped	Total # of Calve	
Calves	0	0	0	0	0	0	0	

Silage Information										
Feed Type	Maximum # Open Piles	Maximum Height (ft)	Maximum Width (ft)	Open Face Area (ft ²)						
Corn	1	20	100	1,514						
Alfalfa	0	0	0							
Wheat	1	20	100	1,514						

Milking Parlor									
Cow	V	OC	NH3						
Milk Cows	lb/day	lb/yr	lb/day	lb/yr					
Total	1.6	568	0.5	194					

Cow Housing										
	V	OC	NH	13	PN	И10				
	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr				
Total	57.0	20,805	120	43,688	62	22,697				

Liquid Manure Handling										
Cow	VOC		NE	13	H2S					
COW	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr				
Milk Cows	9.5	3,451	29.5	10,778	0.5	168				
Dry Cows	0.8	299	2.4	864	0	14				
Support Stock (Helfers, Calves, and Bulls)	3.6	1,326	7.0	2,561	0.1	41				
Large Heifers	0.0	0	0.0	0	0	0				
Medium Heifers	0.0	0	0.0	0	0	0				
Small Heifers	0.0	0	0.0	0	0	0				
Calves	0.0	0	0.0	0	0	0				
Bulls	0.0	0	0.0	0	0	0				
Total	13.9	5,076	38.9	14,203	0.6	222				

Solid Manure Handling									
Cow	V	OC	NH	13					
COW	lb/day	lb/yr	lb/day	lb/yr					
Milk Cows	1.8	667	11.0	4,019					
Dry Cows	0.2	59	0.9	322					
Support Stock (Heifers, Calves, and Bulls)	0.7	260	2.7	975					
Large Heifers	0.0	0	0.0	0					
Medium Heifers	0.0	0	0.0	0					
Small Heifers	0.0	0	0.0	0					
Calves	0.0	0	0.0	0					
Bulls	0.0 0		0.0	0					
Total	2.7	986	14.6	5,315					

Feed Handling and Storage								
	Daily PE (Ib-VOC/day) Annual PE (Ib-VOC							
Corn Emissions	9.4	3,441						
Alfalfa Emissions	0.0	0						
Wheat Emissions	11.9	4,350						
TMR	64.9	23,697						
Total	Total 86.2 31,488							

	Total Daily Post-Project Potential to Emit (lb/day)										
Permit	NOx	SOx	PM10	CO	VOC	NH3	H2S				
Milking Parlor	0.0	0.0	0.0	0.0	1.6	0.5	0.0				
Cow Housing	0.0	0.0	62.2	0.0	57.0	119.7	0.0				
Liquid Manure	0.0	0.0	0.0	0.0	13.9	38.9	0.6				
Solid Manure	0.0	0.0	0.0	0.0	2.7	14.6	0.0				
Feed Handling	0.0	0.0	0.0	0.0	86.2	0.0	0.0				
Total	0.0	0.0	62.2	0.0	161.4	173.7	0.6				

Total Annual Post-Project Potential to Emit (lb/yr)								
Permit	NOx	SOx	PM10	co	VOC	NH3	H2S	
Milking Parlor	0	0	0	0	568	194	0	
Cow Housing	0	0	22,697	0	20,805	43,688	0	
Liquid Manure	0	0	0	0	5,076	14,203	222	
Solid Manure	0	0	0	0	986	5,315	0	
Feed Handling	0	0	0	0	31,488	0	0	
Total	0	0	22,697	0	58,923	63,400	222	

Calculations for milking parlor:

Annual PE = (# milk cows) x (EF2 lb-pollutant/hd-yr)

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calculations for cow housing:

See detailed calculations under Cow Housing Calculations worksheet.

Calculations for liquid manure and solid manure handling:

Annual PE = [{# milk cows} x (EF1 lb-pollutant/hd-yr]] + [{# dry cows} x (EF2 lbpollutant/hd-yr]] + [{# large heifers} x (EF2 lb-pollutant/hd-yr)] + [{# medium heifers} x (EF2 lb-pollutant/hd-yr)] + [{# small heifers} x (EF2 lb-pollutant/hd-yr)] + [{# calves} x (EF2 lb-pollutant/hd-yr)] + [{# bulls} x (EF2 lb-pollutant/hd-yr)]

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

The H2S emission factor is assumed to be 10% of the NH3 lagoon/storage pond(s) emission factor, for each respective herd size.

Calculations for silage emissions:

Annual PE = (EF2) x (area ft²) x (0.0929 m²/ft²) x (8,760 hr/yr) x (60 min/hr) x 2.20E-9 lb/ μ g

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calculation for TMR emissions:

Annual PE = (# cows) x (EF2) x (0.658 m²) x (525,600 min/yr) x (2.20E-9 lb/µg)

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calves are not included in TMR calculation.

Major Source Emissions (lb/yr)								
Permit	Permit NOx SOx PM10 CO VOC							
Milk Parlor	0	0	0	0	0			
Cow Housing	0	0	0	0	0			
Liquid Manure	0	0	0	0	2,442			
Solid Manure	0	0	0	0	0			
Feed Handling	0	0	0	0	0			
Total	0	0	0	0	2,442			

Increase in Emissions

SSIPE (lb/yr)								
	NOx	SOx	PM10	СО	VOC	NH3	H2S	
Milking Parlor	0	0	0	0	0	0	0	
Cow Housing	0	0	0	0	0	0	0	
Liquid Manure	0	0	0	0	0	0	0	
Solid Manure	0	0	0	0	0	0	0	
Feed Handling	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	

Total Daily Change in Emissions (lb/day)								
	NOx	SOx	PM10	CO	VOC	NH3	H2S	
Milking Parlor	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Cow Housing	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Liquid Manure	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Solid Manure	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Feed Handling	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0	

Total Annual Change in Non-Fugitive Emissions (Major Source Emissions) (Ib/yr)								
	NOx	SOx	PM10	CO	VOC	NH3	H2S	
Milking Parlor	0	0	0	0	0	0	0	
Cow Housing	0	0	0	0	0	0	0	
Liquid Manure	0	0	0	0	0	0	0	
Solid Manure	0	0	0	0	0	0	0	
Feed Handling	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	

Rev. January 6, 2020

Pre-Project Facility Information



5. Is any scraped manure sent to a lagoon/storage pond? Answering "yes" assumes worst case.

Pre-Project Herd Size							
Herd	Flushed Freestalls	Scraped Freestalls	Flushed Corrals	Scraped Corrals	Total # of Animals		
Milk Cows	1,000				1,000		
Dry Cows	200				200		
Support Stock (Heifers, Calves, and Bulls)	1,060				1,060		
Large Heifers					0		
Medium Heifers					0		
Small Heifers					0		
Bulls					0		
		Calf Huto	ches		Calf C	orrals	
	Aboveground Flushed	Aboveground Scraped	On-Ground Flushed	On-Ground Scraped	Flushed	Scraped	Total # of Calves
Calves							0

Total Herd Summary				
Total Milk Cows	1,000			
Total Mature Cows	1,200			
Support Stock (Heifers, Calves, and Bulls)	1,060			
Total Calves	0			
Total Dairy Head	2,260			

Pre-Project Silage Information						
Feed Type Max # <u>Open</u> Piles Max Height (ft) Max Width (ft)						
Corn	1	15	100			
Alfalfa						
Wheat	1	15	100			

Post-Project Facility Information

1.	Does this facility house Holstein or Jersey cows? Most facilities house Holstein cows unless explicitly stated on the F	Holstein TO or application.
2.	Does the facility have an <u>anaerobic</u> treatment lagoon?	no
3.	Does the facility land apply liquid manure? Answering "yes" assumes worst case.	yes
4.	Does the facility land apply solid manure? Answering "yes" assumes worst case.	yes

5. Is any scraped manure sent to a lagoon/storage pond? yes Answering "yes" assumes worst case.

6. Does this project result in an increase or relocation of uncovered surface area for any lagoon/storage pond?

Post-Project Herd Size Scraped Freestalls Flushed Freestalls Total # of Animals Flushed Corrals Scraped Corrals Herd Milk Cow 1.000 1,000 Dry Cows 200 200 1.060 rt Stock (Heifers, Calv 1.060 Large Heifers 0 0 Medium Heifers 0 Small Heifers 0 Bulls Calf Hu Calf Corrals Aboveground Flushed Aboveground Scraped On-Ground Flushed On-Ground Scraped Total # of Calves Flushed Scraped Calves

no

Total Herd Summary				
Total Milk Cows	1,000			
Total Mature Cows	1,200			
Support Stock (Heifers, Calves, and Bulls)	1,060			
Total Calves	0			
Total Dairy Head	2,260			

Post-Project Silage Information						
Feed Type Max # <u>Open</u> Piles Max Height (ft) Max Width (ft)						
Corn	1	15	100			
Alfalfa						
Wheat	1	15	100			

This spreadsheet serves only as a resource to calculate potential emissions from dairies, and may not reflect the final emissions used by the District due to parameters not addressed in this spreadsheet and/or omissions from the spreadsheet. Any other permittable equipment (e.g. IC engines, gasoline tanks, etc.) at a facility will need to be calculated separately. All final calculations used in permitting projects will be conducted by District staff.

VOC Mitigation Measures and Control Efficiencies

	Milking Parlor						
Measure Proposed?				VOC Control Efficiency (%)			
Pre-Project	Post-Project	Mitigation Measure(s) per Emissions Point	Pre-Project	Post-Project			
		Enteric Emissions Mitigations					
	V	(D) Feed according to NRC guidelines	10%	10%			
	Total Control Efficiency						
		Milking Parlor Floor Mitigations					
	Image: A state of the state	(D) Feed according to NRC guidelines	10%	10%			
	V	(D) Flush or hose milk parlor immediately prior to, immediately after, or during each milking. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF.	0%	0%			
	Total Control Efficiency						

Measure	Proposed?	Cow Housing	VOC Control	Efficiency (%)
Pre-Project	Post-Project	Mitigation Measure(s) per Emissions Point	Pre-Project	Post-Projec
FIE-FIOJECI	FOSt-FT0ject	Enteric Emissions Mitigations	FIE-FI0ject	FUSI-FIUJE
		Feed according to NRC guidelines	10%	10%
<u> </u>		Total Control Efficiency	10 %	10%
		Corrals/Pens Mitigations	10%	10%
v		Feed according to NRC guidelines	10%	10%
<u> </u>			1076	1076
V	V	Inspect water pipes and troughs and repair leaks at least once every seven days. Note: If selected for dairies > 999 milk cows, CE is already included in EF.	0%	0%
V		Dairies: Clean manure from corrals at least four times per year with at least 60 days between cleaning, or clean corrals at least once between April and July and at least once between September and December. Note: If selected for dairies > 999 milk cows, CE is already included in EF. Note: No additional control given for increased cleaning frequency (e.g. BACT requirement). <u>Heifer/Calf</u> <u>Ranches</u> : Scrape corrals twice a year with at least 90 days between cleanings, excluding in-corral mounds. Note: No additional control given for increased cleaning frequency (e.g. BACT requirement).	0%	0%
V		Scrape, vacuum, or flush concrete lanes in corrals at least once every day for mature cows and every seven days for support stock, or clean concrete lanes such that the depth of manure does not exceed 12 inches at any point or time. Note: No additional control given for increased cleaning frequency (e.g. BACT requirement).	10%	10%
Ø	V	Implement one of the following: 1) slope the surface of the corrals at least 3% where the available space for each animal is 400 sq ft or less and slope the surface of the corrals at least 1.5% where the available space for each animal is more than 400 sq ft; 2) maintain corrals to ensure proper drainage preventing water from standing more than 48 hrs; 3) harrow, rake, or scrape pens sufficiently to maintain a dry surface. Note: If selected for dairies > 999 milk cows, CE already included in EF.	0%	0%
		Install shade structures such that they are constructed with a light permeable roofing material. Note: If selected for dairies > 999 milk cows, the control efficiency will be 5% since the EF used includes a partial control for this measure.		
		Install all shade structures uphill of any slope in the corral. Note: If selected for dairies > 999 milk cows, the control efficiency will be 5% since the EF used includes a partial control for this measure.		
		Clean manure from under corral shades at least once every 14 days, when weather permits access into corral. Note: If selected for dairies > 999 milk cows, the control efficiency will be 5% since the EF used includes a partial control for this measure.	0%	0%
		Install shade structure so that the structure has a North/South orientation. Note: If selected for dairies > 999 milk cows, the control efficiency will be 5% since the EF used includes a partial control for this measure.		
V		Manage corrals such that the manure depth in the corral does not exceed 12 inches at any time or point, except for in-corral mounding. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. The manure facility must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF.	0%	0%
		Knockdown fence line manure build-up prior to it exceeding a height of 12 inches at any time or point. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. The facility must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible.	0%	0%
		Use lime or a similar absorbent material in the corral according to the manufacturer's recommendation to minimize moisture in the corrals.	0%	0%
		Apply thymol to the corral soil in accordance with the manufacturer's recommendation.	0%	0%
		Total Control Efficiency	19.00%	19.00%
		Bedding Mitigations	13.0070	13.00 %
		Feed according to NRC guidelines	10%	10%
			1070	1070
		Use non-manure-based bedding and non-separated solids based bedding for at least 90% of the bedding material, by weight, for freestalls (e.g. rubber mats, almond shells, sand, or waterbeds).	0%	0%

V	V	For a large dairy (1,000 milk cows or larger) or a heifer/calf ranch - Remove manure that is not dry from individual cow freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 7	100/							
		days.	10%	10%						
		(D) For a medium dairy only (500 to 999 milk cows) - Remove manure that is not dry from individual cow freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 14 days.								
		0%	0%							
		Total Control Efficiency	19.00%	19.00%						
		Lanes Mitigations								
		Feed according to NRC guidelines	10%	10%						
V	V	Pave feedlanes, where present, for a width of at least 8 feet along the corral side of the feedlane fence for milk and dry cows and at least 6 feet along the corral side of the feedlane for heifers. Note: No control efficiency at this time.	0%	0%						
V		Dairies: Flush, scrape, or vacuum freestall flush lanes immediately prior to or after, or during each milking; or flush or scrape freestall flush lanes at least 3 times per day. <u>Heifer/Calf Ranches</u> : Vacuum, scrape, or flush freestalls at least once every seven days.	10%	10%						
		(D) Have no animals in exercise pens or corrals at any time.	0%	0%						
	Total Control Efficien									

		Liquid Manure Handling		
Measure F	vroposed?	Mitigation Measure(s) per Emissions Point	VOC Control	Efficiency (%)
Pre-Project	Post-Project		Pre-Project	Post-Project
		Lagoons/Storage Ponds Mitigations		
✓		Feed according to NRC guidelines	10%	10%
		Use phototropic lagoon	0%	0%
		Use an anaerobic treatment lagoon designed according to NRCS Guideline No. 359, or aerobic treatment lagoon, or mechanically aerated lagoon, or covered lagoon digester vented to a control device with minimum 95% control	0%	0%
		Remove solids from the waste system with a solid separator system, prior to the waste entering the lagoon. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF.	0%	0%
	7	Maintain lagoon pH between 6.5 and 7.5	10%	10%
		Total Control Efficiency	19.00%	19.00%
		Liquid Manure Land Application Mitigations		
	V	Feed according to NRC guidelines	10%	10%
		Only apply liquid manure that has been treated with an anaerobic or aerobic treatment lagoon, aerobic lagoon, or digester system	0%	0%
V		Allow liquid manure to stand in the fields for no more than 24 hours after irrigation. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF.	0%	0%
		Apply liquid/slurry manure via injection with drag hose or similar apparatus	0%	0%
		Total Control Efficiency	10.00%	10.00%

		Solid Manure Handling		
Measure F	Proposed?	Mitigation Measure(s) per Emissions Point	VOC Control	Efficiency (%)
Pre-Project	Post-Project	willigation weasure(s) per Emissions Point	Pre-Project	Post-Project
		Solid Manure Storage Mitigations		
	v	Feed according to NRC guidelines	10%	10%
		LARGE CAFO ONLY: Within 72 hours of removal from housing, either a) remove dry manure from the facility, or b) cover dry manure outside the housing with a weatherproof covering from October through May, except for times when wind events remove the covering, not to exceed 24 hours per event.	10%	10%
	•	Total Control Efficiency	19.00%	19.00%
		Separated Solids Piles Mitigations		
		Feed according to NRC guidelines	0%	0%
		LARGE CAFO ONLY: Within 72 hours of removal from the drying process, either a) remove separated solids from the facility, or b) cover separated solids outside the housing with a weatherproof covering from October through May, except for times when wind events remove the covering, not to exceed 24 hours per event.	0%	0%
		Total Control Efficiency	0.00%	0.00%
		Solid Manure Land Application Mitigations		
V	v	Feed according to NRC guidelines	10%	10%
V		Incorporate all solid manure within 72 hours of land application. Note: If selected for dairies > 999 milk cows, control efficiency is already included in EF. Note: No additional control given for rapid manure incorporation (e.g. BACT requirement).	0%	0%
		Only apply solid manure that has been treated with an anaerobic treatment lagoon, aerobic lagoon or digester system.	0%	0%
		Apply no solid manure with a moisture content of more than 50%	0%	0%
		Total Control Efficiency	10.00%	10.00%

Silage and TMR											
Measure Proposed?		Mitigation Measure(s) per Emissions Point	VOC Control Efficiency (%)								
Pre-Project	Post-Project		Pre-Project	Post-Project							
		Corn/Alfalfa/Wheat Silage Mitigations									
		1. Utilize a sealed feed storage system (e.g. Ag-Bag) for bagged silage, or									

	Total Control Efficiency*	39.00%	39.00%
	For dairies - implement <u>two</u> of the following: For heifer/calf ranches - implement <u>one</u> of the following: <u>Manage Exposed Silage</u> . a) manage silage piles such that only one silage pile has an uncovered face and the uncovered face has a total exposed surface area of less than 2,150 sq. ft., or b) manage multiple uncovered silage piles such that the total exposed surface area of all silage piles is less than 4,300 sq ft. <u>Maintain Silage Working Face</u> . a) use a shaver/facer to remove silage from the silage pile, or b) maintain a smooth vertical surface on the working face of the silage pile <u>Silage Additive</u> : a) inoculate silage with homolactic acid bacteria in accordance with manufacturer recommendations to achieve a concentration of at least 100,000 colony forming units per gram of wet forage or apply proprionic acid, benzoic acid, sorbic acid, sodium benzoate, or potassium sorbate at a rate specified by the manufacturer to reduce yeast counts when forming silage pile; or b) apply other additives at specified rates that have been demonstrated to reduce alcohol concentrations in silage and/or VOC emissions from silage and have been approved by the District and EPA.	0.070	55.078
V	c) harvest silage crop at > or = 65% moisture for corn; and >= 60% moisture for alfalfa/grass and other silage crops; manage silage material delivery such that no more than 6 inches of materials are uncompacted on top of the pile; and incorporate the applicable Theoretical Length of Chop (TLC) and roller opening for the crop being harvested.	39.0%	39.0%
	 a) build silage piles such that the average bulk density is at least 44 lb/cu-ft for corn silage and 40 lb/cu-ft for other silage types, as measured in accordance with Section 7.10 of Rule 4570, b) when creating a silage pile, adjust filling parameters to assure a calculated average bulk density of at least 44 lb/cu-ft for corn silage and at least 40 lb/cu-ft for other silage types, using a spreadsheet approved by the District. 		
	2. Cover the surface of silage piles, except for the area where feed is being removed from the pile, with a plastic tarp that is at least 5 mils thick (0.005 inches), multiple plastic tarps with a cumulative thickness of at least 5 mils (0.005 inches), or an oxygen barrier film covered with a UV resistant material within 72 hours of last delivery of material to the pile, and implement one of the following:		

*Assumes 25% control for density mitigation measures and 10% each for the two optional measures, resulting in an overall control of 39%. The same conservative control efficiency will be applied to the sealed feed storage system (Ag-Bag).

		TMR Mitigations		
V	V	(D) Push feed so that it is within 3 feet of feedlane fence within 2 hrs of putting out the feed or use a feed trough or other feeding structure designed to maintain feed within reach of the cows.	10%	10%
V		(D) Begin feeding total mixed rations within 2 hrs of grinding and mixing rations. Note: If selected for dairies > 999 milk cows, control efficiency already included in EF.	0%	0%
	V	Feed steam-flaked, dry rolled, cracked or ground corn or other ground cereal grains.	10%	10%
		Remove uneaten wet feed from feed bunks within 24 hrs after then end of a rain event.	0%	0%
		(D) For total mixed rations that contain at least 30% by weight of silage, feed animals total mixed rations that contain at least 45% moisture.	0%	0%
		Feed according to NRC guidelines. Note: If selected for dairies, control efficiency already included in EF.	0%	0%
		19.00%	19.00%	

Ammonia Mitigation Measures and Control Efficiencies

	Milking Parlor											
Measure Proposed?		Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)								
Pre-Project	Post-Project	Witigation Measure(s) per Emissions Point	Pre-Project	Post-Project								
		Milking Parlor Floor Mitigations										
✓	V	Feed according to NRC guidelines	28%	28%								
		Total Control Efficiency	28%	28%								

		Cow Housing		
Measure Proposed?		Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)
Pre-Project	Post-Project		Pre-Project	Post-Project
		Corrals/Pens Mitigations		
	I	Feed according to NRC guidelines	28%	28%
V		Clean manure from corrals at least four times per year with at least 60 days between cleaning, or clean corrals at least once between April and July and at least once between September and December. OR Use lime or a similar absorbent material in the corral according to the manufacturer's recommendation to minimize moisture in the corrals. OR Apply thymol to the corral soil in accordance with the manufacturer's recommendation.	50%	50%
		64%	64%	
		Bedding Mitigations		
	V	Feed according to NRC guidelines	28%	28%
		Use non-manure-based bedding and non-separated solids based bedding for at least 90% of the bedding material, by weight, for freestalls (e.g. rubber mats, almond shells, sand, or waterbeds). OR For a large dairy only (1,000 milk cows or larger) - Remove manure that is not dry from individual cow freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 7 days. OR For a medium dairy only (500 to 999 milk cows) - Remove manure that is not dry froe manure that is not dry from individual cow freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 7 days. OR For a medium dairy only (500 to 999 milk cows) - Remove manure that is not dry from individual cow freestall beds or rake, harrow, scrape, or grade freestall bedding at least once every 14 days.	47.7%	47.7%
		62.34%	62.34%	
		Lanes Mitigations		
✓		Feed according to NRC guidelines	28%	28%
		Total Control Efficiency	28%	28%

Liquid Manure Handling											
Measure Proposed?		Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)							
Pre-Project	Post-Project	initigation measure(s) per Emissions Point	Pre-Project	Post-Project							
		Lagoons/Storage Ponds Mitigations									
7	✓	Feed according to NRC guidelines	28%	28%							
		Use phototropic lagoon OR Remove solids from the waste system with a solid separator system, prior to the waste entering the lagoon.	0%	0%							
		Total Control Efficiency	28.0%	28.0%							
		Liquid Manure Land Application Mitigations									
v	V	Feed according to NRC guidelines	28%	28%							
		Only apply liquid manure that has been treated with an anaerobic treatment lagoon	0%	0%							
		Total Control Efficiency	28.00%	28.00%							

	Solid Manure Handling											
Measure Proposed?		Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)								
Pre-Project	Post-Project		Pre-Project	Post-Project								
		Solid Manure Land Application Mitigations										
Image: A state of the state	Image: A start of the start	Feed according to NRC guidelines	28%	28%								
		Incorporate all solid manure within 72 hours of land application. AND Only apply solid manure that has been treated with an anaerobic treatment lagoon, aerobic lagoon or digester system. AND Apply no solid manure with a moisture content of more than 50%	0%	0%								
		Total Control Efficiency	28.00%	28.00%								

Dairy Emission Factors

Ib/hd-yr Dairy Emissions Factors for Holstein Cows Milk Cows Dry Cows Large Heifers (15 to 24 months) Medium Heifers (7 to 14 months) Small Heifers (3 to 6 months) Calves (0 - 3 months) Bulls																														
			1	Milk C	Cows			Dry C	ows		Large	Heifers (15	i to 24 mo	nths)	Medi	um Heifers	(7 to 14 mc	onths)	Sma	III Heifers (3	3 to 6 mon	ths)	1	Calves (0 -	3 months)			Bul	ls	
			Uncor	ntrolled	Cont	rolled	Uncon	trolled	Cont	rolled	Uncor	trolled	Cont	rolled	Uncor	trolled	Cont	rolled	Uncon	trolled	Cont	rolled	Uncontrolled		Cont	rolled	Uncontrolled		Contr	rolled
			<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2	<1000 milk cows	≥1000 milk cows	EF1	EF2
	voc	Enteric Emissions in Milking Parlors	0.43	0.41	0.37	0.37	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-		-		-	-	-
Milking Parlor	VUC	Milking Parlor Floor	0.04	0.03	0.03	0.03	•	-	-	-	-	-	-	-	-	-	-	-		-		-		-	-	-			-	-
-		Total	0.47	0.44	0.40	0.40	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
[NH3	Total	0.19	0.19	0.14	0.14	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
		Enteric Emissions in Cow Housing	3.89	3.69	3.32	3.32	2.33	2.23	2.01	2.01	1.81	1.71	1.54	1.54	1.23	1.17	1.05	1.05	0.69	0.65	0.58	0.58	0.32	0.31	0.28	0.28	1.10	1.04	0.94	0.94
		Corrals/Pens	10.00	6.60	5.35	5.35	5.40	3.59	2.91	2.91	4.20	2.76	2.23	2.23	2.85	1.88	1.52	1.52	1.60	1.04	0.85	0.85	0.75	0.50	0.41	0.41	2.55	1.67	1.35	1.35
	voc	Bedding	1.05	1.00	0.81	0.81	0.57	0.54	0.44	0.44	0.44	0.42	0.34	0.34	0.30	0.28	0.23	0.23	0.17	0.16	0.13	0.13	0.08	0.08	0.06	0.06	0.27	0.25	0.20	0.20
		Lanes	0.84	0.80	0.65	0.65	0.45	0.44	0.35	0.35	0.35	0.33	0.27	0.27	0.24	0.23	0.18	0.18	0.13	0.13	0.10	0.10	0.06	0.06	0.05	0.05	0.21	0.20	0.16	0.16
Cow Housing		Total	15.78	12.09	10.13	10.13	8.75	6.80	5.71	5.71	6.81	5.22	4.38	4.38	4.62	3.56	2.99	2.99	2.59	1.98	1.66	1.66	1.22	0.95	0.80	0.80	4.13	3.16	2.65	2.65
		Enteric Emissions in Cow Housing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		Corrals/Pens	41.90	41.90	15.08	15.08	21.20	21.20	7.63	7.63	11.00	11.00	3.96	3.96	7.90	7.90	2.84	2.84	6.00	6.00	2.16	2.16	1.80	1.80	0.65	0.65	15.30	15.30	5.51	5.51
	NH3	Bedding	6.30	6.30	2.37	2.37	3.20	3.20	1.20	1.20	1.70	1.70	0.64	0.64	1.20	1.20	0.45	0.45	0.90	0.90	0.34	0.34	0.30	0.30	0.11	0.11	2.30	2.30	0.87	0.87
		Lanes	5.10	5.10	3.67	3.67	2.60	2.60	1.87	1.87	1.30	1.30	0.94	0.94	1.00	1.00	0.72	0.72	0.70	0.70	0.50	0.50	0.20	0.20	0.14	0.14	1.90	1.90	1.37	1.37
		Total	53.30	53.30	21.13	21.13	27.00	27.00	10.71	10.71	14.00	14.00	5.54	5.54	10.10	10.10	4.02	4.02	7.60	7.60	3.00	3.00	2.30	2.30	0.90	0.90	19.50	19.50	7.74	7.74
		Lagoons/Storage Ponds	1.52	1.30	1.05	1.05	0.82	0.71	0.57	0.57	0.64	0.54	0.44	0.44	0.43	0.37	0.30	0.30	0.24	0.21	0.17	0.17	0.11	0.10	0.08	0.08	0.40	0.33	0.27	0.27
	voc	Liquid Manure Land Application	1.64	1.40	1.26	1.26	0.89	0.76	0.69	0.69	0.69	0.58	0.53	0.53	0.47	0.40	0.36	0.36	0.26	0.22	0.20	0.20	0.12	0.11	0.10	0.10	0.42	0.35	0.32	0.32
Liquid Manure		Total	3.16	2.70	2.31	2.31	1.71	1.47	1.26	1.26	1.33	1.13	0.97	0.97	0.90	0.77	0.66	0.66	0.51	0.43	0.37	0.37	0.24	0.21	0.18	0.18	0.82	0.68	0.58	0.58
Handling		Lagoons/Storage Ponds	8.20	8.20	5.90	5.90	4.20	4.20	3.02	3.02	2.20	2.20	1.58	1.58	1.50	1.50	1.08	1.08	1.20	1.20	0.86	0.86	0.35	0.35	0.25	0.25	3.00	3.00	2.16	2.16
	NH3	Liquid Manure Land Application	8.90	8.90	6.41	6.41	4.50	4.50	3.24	3.24	2.30	2.30	1.66	1.66	1.70	1.70	1.22	1.22	1.30	1.30	0.94	0.94	0.37	0.37	0.27	0.27	3.23	3.23	2.33	2.33
		Total	17.10	17.10	12.31	12.31	8.70	8.70	6.26	6.26	4.50	4.50	3.24	3.24	3.20	3.20	2.30	2.30	2.50	2.50	1.80	1.80	0.72	0.72	0.52	0.52	6.23	6.23	4.49	4.49
		Solid Manure Storage	0.16	0.15	0.12	0.12	0.09	0.08	0.07	0.07	0.07	0.06	0.05	0.05	0.05	0.04	0.03	0.03	0.03	0.02	0.02	0.02	0.01	0.01	0.01	0.01	0.04	0.04	0.03	0.03
		Separated Solids Piles	0.06	0.06	0.06	0.06	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.02	0.02	0.02	0.02	0.01	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.02	0.02	0.02	0.02
	voc	Solid Manure Land Application	0.39	0.33	0.30	0.30	0.21	0.18	0.16	0.16	0.16	0.14	0.12	0.12	0.11	0.09	0.08	0.08	0.06	0.05	0.05	0.05	0.03	0.03	0.02	0.02	0.10	0.08	0.07	0.07
Solid Manure		Total	0.61	0.54	0.48	0.48	0.33	0.29	0.26	0.26	0.26	0.23	0.20	0.20	0.17	0.15	0.14	0.14	0.10	0.09	0.08	0.08	0.05	0.04	0.04	0.04	0.16	0.14	0.12	0.12
Handling		Solid Manure Storage	0.95	0.95	0.95	0.95	0.48	0.48	0.48	0.48	0.25	0.25	0.25	0.25	0.18	0.18	0.18	0.18	0.13	0.13	0.13	0.13	0.04	0.04	0.04	0.04	0.35	0.35	0.35	0.35
		Separated Solids Piles	0.38	0.38	0.38	0.38	0.19	0.19	0.19	0.19	0.10	0.10	0.10	0.10	0.07	0.07	0.07	0.07	0.05	0.05	0.05	0.05	0.02	0.02	0.02	0.02	0.14	0.14	0.14	0.14
	NH3	Solid Manure Land Application	2.09	2.09	1.50	1.50	1.06	1.06	0.76	0.76	0.55	0.55	0.40	0.40	0.39	0.39	0.28	0.28	0.30	0.30	0.22	0.22	0.09	0.09	0.06	0.06	0.76	0.76	0.55	0.55
		Total	3.42	3.42	2.83	2.83	1.73	1.73	1.43	1.43	0.90	0.90	0.75	0.75	0.64	0.64	0.53	0.53	0.48	0.48	0.40	0.40	0.15	0.15	0.12	0.12	1.25	1.25	1.04	1.04

	Silage and	TMR (Total Mixed Ra	tion) Emissions (μ	g/m^2-min)	
		Silage Type	Uncontrolled	EF1	EF2
		Corn Silage	34,681	21,155	21,155
Feed Storage and	1/00	Alfalfa Silage	17,458	10,649	10,649
Handling	VOC	Wheat Silage	43,844	26,745	26,745
		TMR	13,056	10,575	10,575

ons: 1) Each silage pile is completely covered except for the front face and 2) Rations are fed within 48 hours

		PM ₁₀ Emission Factors (lb/hd-yr)
Type of Cow	Dairy EF	Source
Cows in Freestalls	1.37	Based on a Summer 2003 study by Texas A&M ASAE at a West Texas Dairy
Milk/Dry in Loafing Barns	2.73	SJVAPCD
Heifers/Bulls in Loafing Barns	5.28	SJVAPCD
Calves in Loafing Barns	0.69	SJVAPCD
Milk/Dry in Corrals	5.46	Based on a Summer 2003 study by Texas A&M ASAE at a West Texas Dairy
Support Stock (Heifers/Bulls) in Open Corrals	10.55	Based on a USDA/UC Davis report quantifying dairy and feedlot emissions in Tulare & Kern Counties (April '01)
Large Heifers in Open Corrals	8.01	SJVAPCD
Calf (under 3 mo.) open corrals	1.37	SJVAPCD
Calf on-ground hutches	0.343	SJVAPCD
Calf above-ground flushed	0.069	SJVAPCD
Calf above-ground scraped	0.206	SJVAPCD

The controlled PM10 EF will be calculated based on the specific PM10 mitigation measures, if any, for each freestall, corral, or calf hutch area. See the PM Mitigation Measures for calculations.

PM10 Mitigation Measures and Control Efficiencies

Control Measure	PM10 Control Efficiency
Shaded corrals (milk and dry cows)	16.7%
Shaded corrals (heifers and bulls)	8.3%
Downwind shelterbelts	12.5%
Upwind shelterbelts	10%
Freestall with no exercise pens and non-manure based bedding	90%
Freestall with no exercise pens and manure based bedding	80%
Fibrous layer in dusty areas (i.e. hay, etc.)	10%
Bi-weekly corral/exercise pen scraping and/or manure removal using a pull type manure harvesting equipment in morning hours when moisture in air except during periods of rainy weather	15%
Sprinkling of open corrals/exercise pens	12.5%
Feeding young stock (heifers and calves) near dusk	10%

Pre-Project PM10 Mitigation Measures

Ĩ		Pre-Project PM10 Mitigation Measures													
	Housing Name(s) or #(s)	Type of Housing	Type of cow	Total # of cows in Each Housing Structure(s)	Maximum Design Capacity of <u>Each</u> Structure	# of Combined Housing Structures in row	Shaded Corrals	Downwind Shelterbelts	Upwind Shelterbelts	No exercise pens, non-manure bedding	No exercise pens, manure bedding	Fibrous layer	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk
1	milk	open corral	milk cows	1000	1000	1									
2	dry	open corral	dry cows	200	200	1									
3	support	open corral	support stock	1060	1060	1									
Ţ		Pre-Pro	ject Total # of Cows	2,260											

Ī							Pre-Project	PM10 Control	Efficiencies and	d Emission Factors					
	Housing Name(s) or #(s)	Type of Housing	Type of cow	Total # of cows in Each Housing Structure(s)	Maximum Design Capacity of <u>Each</u> Structure	Uncontrolled EF (lb/hd-yr)	Shaded Corrals	Downwind Shelterbelts	Upwind Shelterbelts	No exercise pens, non-manure bedding	No exercise pens, manure bedding	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk	Controlled EF (lb/hd-yr)
1	milk	open corral	milk cows	1000	1000	5.460									5.46
2	dry	open corral	dry cows	200	200	5.460									5.46
3	support	open corral	support stock	1060	1060	10.550									10.55
		Pre-Pro	ject Total # of Cows	2,260											

Post-Project PM10 Mitigation Measures

ĺ			Post-Project PM10 Mitigation Measures													
	Housing Name(s) or #(s)	Type of Housing	Type of cow	Total # of cows in Each Housing Structure(s)	Capacity of Each	# of Combined Housing Structures in row	Shaded Corrals	Downwind Shelterbelts	Upwind Shelterbelts	No exercise pens, non-manure bedding	No exercise pens, manure bedding	Fibrous layer	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk	
1	milk	open corral	milk cows	1000	1000	1										
2	dry	open corral	dry cows	200	200	1										
3	support	open corral	support stock	1060	1060	1										
		Post-Pro	ject Total # of Cows	2,260											-	

[Post-Projec	t PM10 Control	Efficiencies an	d Emission Factors						
	Housing Name(s) or #(s)	Type of Housing	Type of cow	Total # of cows in Each Housing Structure(s)	Maximum Design Capacity of <u>Each</u> Structure	Uncontrolled EF (lb/hd-yr)	Shaded Corrals	Downwind Shelterbelts	Upwind Shelterbelts	No exercise pens, non-manure bedding	No exercise pens, manure bedding	Eibrous laver	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk	Controlled EF (lb/hd-yr)
1	milk	open corral	milk cows	1000	1000	5.460										5.46
2	dry	open corral	dry cows	200	200	5.460										5.46
3	support	open corral	support stock	1060	1060	10.550										10.55

Pre-Project Potential to Emit - Cow Housing

				Р	re-Project Pote	ential to Emit - C	ow Housing					
	Housing Name(s) or #(s)	Type of Cow	# of Cows	Controlled VOC EF (lb/hd-yr)	Controlled NH3 EF (lb/hd-yr)	Controlled PM10 EF (lb/hd-yr)	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)
1	milk	milk cows	1,000	10.13	21.13	5.46	27.8	10,130	57.9	21,128	15.0	5,460
2	dry	dry cows	200	5.71	10.71	5.46	3.1	1,142	5.9	2,142	3.0	1,092
3	support	support stock	1,060	4.38	5.54	10.55	12.7	4,643	16.1	5,868	30.6	11,183
	Pre-Project Tota	I # of Cows	2,260				43.6	15,915	79.9	29,138	48.6	17,735

*Multiple emissions units (freestalls, corrals, calf hutch areas, etc.) are combined in these rows.

		Pre	e-Project Totals			
Total # of Cows	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)
2,260	43.6	15,915	79.9	29,138	48.6	17,735

Calculations:

Annual PE 1 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE1 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

Post-Project Potential to Emit - Cow Housing

				P	ost-Project Pot	ential to Emit - C	ow Housing					
	Housing Name(s) or #(s)	Type of Cow	# of Cows	Controlled VOC EF (lb/hd-yr)	Controlled NH3 EF (lb/hd-yr)	Controlled PM10 EF (lb/hd-yr)	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)
1	milk	milk cows	1,000	10.13	21.13	5.46	27.8	10,130	57.9	21,128	15.0	5,460
2	dry	dry cows	200	5.71	10.71	5.46	3.1	1,142	5.9	2,142	3.0	1,092
3	support	support stock	1,060	4.38	5.54	10.55	12.7	4,643	16.1	5,868	30.6	11,183
	Post-Project # of Cows	s (non-expansion)	2,260				43.6	15,915	79.9	29,138	48.6	17,735

*Multiple emissions units (freestalls, corrals, calf hutch areas, etc.) are combined in these rows.

	Post-Project Totals												
Total # of Cows	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)							
2,260	43.6	15,915	79.9	29,138	48.6	17,735							

Calculations:

Annual PE 2 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE2 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

Pre-Project Worst Case BACT Calculations - Cow Housing

This table uses the worst case emission factor for each cow type and the maximum design capacity of the housing unit. This should only be used for BACT calculation

					purpo	ses.								
		Worst-Case Pre-Project Potential to Emit - Cow Housing												
	Housing Name(s) or #(s)	Type of Cow	Capacity per housing unit	Controlled VOC EF (lb/hd-yr)	Controlled NH3 EF (lb/hd-yr)	Controlled PM10 EF (lb/hd-yr)	VOC (lb/day)	VOC (lb/yr)	NH3 (lb/day)	NH3 (lb/yr)	PM10 (lb/day)	PM10 (lb/yr)		
1	milk	milk cows	1000	10.13	21.13	10.55	27.8	10,130	57.9	21,128	28.9	10,550		
2	dry	dry cows	200	10.13	21.13	10.55	5.6	2,026	11.6	4,226	5.8	2,110		
3	support	support stock	1060	10.13	21.13	10.55	29.4	10,738	61.4	22,396	30.6	11,183		
							62.8	22,894	130.9	47,750	65.3	23,843		

*Multiple emissions units (freestalls, corrals, calf hutch areas, etc.) are combined in these rows. BACT applicability has been calculated for EACH emissions unit in this row.

Pre-Project Totals									
VOC (lb/day) VOC (lb/yr) NH3 (lb/day) NH3 (lb/yr) PM10 (lb/day) PM10 (lb/yr)									
62.8 22,894 130.9 47,750 65.3 23,843									

Calculations:

Annual PE 1 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE1 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

Post-Project Worst Case BACT Calculations - Existing Cow Housing

This table uses the worst case emission factor for each cow type and the maximum design capacity of the housing unit. This should only be used for BACT calculation purposes.

		Post-Project Worst Case BACT Calculations - Existing Cow Housing																
	Housing Name(s) or #(s)	Type of Cow	Capacity per housing unit	Controlled VOC EF (lb/hd-yr)	Controlled NH3 EF (lb/hd-yr)	Controlled PM10 EF (lb/hd-yr)	VOC (lb/day)	VOC (lb/yr)	NH3 (Ib/day)	NH3 (Ib/yr)	PM10 (lb/day)	PM10 (lb/yr)	VOC AIPE	NH3 AIPE	PM10 AIPE	BACT Triggered for VOC?	BACT Triggered for NH3?	BACT Triggered for PM10?
1	milk	milk cows	1000	10.13	21.13	10.55	27.8	10,130	57.9	21,128	28.9	10,550	0.0	0.0	0.0	No	No	No
2	dry	dry cows	200	10.13	21.13	10.55	5.6	2,026	11.6	4,226	5.8	2,110	0.0	0.0	0.0	No	No	No
3	support	support stock	1060	10.13	21.13	10.55	29.4	10,738	61.4	22,396	30.6	11,183	0.0	0.0	0.0	No	No	No
							62.8	22,894	130.9	47,750	65.3	23,843						

*Multiple emissions units (freestalls, corrals, calf hutch areas, etc.) are combined in these rows. BACT applicability has been calculated for EACH emissions unit in this row.

Calculations:

Annual PE 2 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE2 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

Post-Project Totals										
VOC (lb/day) VOC (lb/yr) NH3 (lb/day) NH3 (lb/yr) PM10 (lb/day) PM10 (lb/yr)										
62.8	62.8 22,894 130.9 47,750 65.3 23,843									

Calculations:

Annual PE 2 for each pollutant (lb/yr) = Controlled EF (lb/hd-yr) x # of cows (hd) Daily PE2 for each pollutant (lb/day) = [Controlled EF (lb/hd-yr) x # of cows (hd)] ÷ 365 (day/yr)

BACT Applicability

Milking Parlor								
VOC Emissions								
PE2 (lb/day) PE1 (lb/day) EF2 EF1 AIPE (lb/day)								
Milk Cows	1.1	1.1	0.40	0.40	0.0			
Total								
	N	13 Emissions						
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)			
Milk Cows	0.4	0.4	0.14	0.14	0.0			
				Total	0.0			

Cow Housing					
See detailed cow housing AIPE calculations on the BACT Calcs page.					

Milk Cows Dry Cows Support Stock (Helfers, Calves, and Bulls) Large Helfers Medium Heffers Small Helfers Calves Bulls	DC Emissions PE2 (lb/day) 2.9 0.3 1.3 0.0 0.0 0.0 0.0 0.0 0.0 0.0	- Lagoon/Stora PE1 (lb/day) 2.9 0.3 1.3 0.0 0.0 0.0	EF2 1.05 0.57 0.44 0.44	EF1 1.05 0.57 0.44	AIPE (Ib/day) 0.0 0.0
Milk Cows Dry Cows Support Stock (Herlers, Calves, and Bulls) Large Heifers Medium Heifers Small Heifers Calves Bulls	2.9 0.3 1.3 0.0 0.0 0.0 0.0 0.0	2.9 0.3 1.3 0.0 0.0 0.0	1.05 0.57 0.44 0.44	1.05 0.57	0.0
Dry Cows Support Stock (Heifers, Calves, and Bulls) Large Heifers Medium Hefiers Small Heifers Calves Bulls	0.3 1.3 0.0 0.0 0.0 0.0 0.0	0.3 1.3 0.0 0.0 0.0	0.57 0.44 0.44	0.57	
Support Stock (Heifers, Calves, and Bulls) Large Heifers Medium Heifers Small Heifers Calves Bulls	1.3 0.0 0.0 0.0 0.0 0.0	1.3 0.0 0.0 0.0	0.44		0.0
Large Heifers Medium Heifers Small Heifers Calves Bulls	0.0 0.0 0.0 0.0	0.0 0.0 0.0	0.44	0.44	
Medium Hefiers Small Heifers Calves Bulls	0.0 0.0 0.0	0.0			0.0
Small Heifers Calves Bulls	0.0	0.0		0.44	0.0
Calves Bulls	0.0		0.30	0.30	0.0
Bulls			0.17	0.17	0.0
	0.0	0.0	0.08	0.08	0.0
		0.0	0.27	0.27	0.0
				Total	0.0
	VOC Emissi	ons - Land App	lication		
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	3.5	3.5	1.26	1.26	0.0
Dry Cows	0.4	0.4	0.69	0.69	0.0
Support Stock (Heifers, Calves, and Bulls)	1.5	1.5	0.53	0.53	0.0
Large Heifers	0.0	0.0	0.53	0.53	0.0
Medium Hefiers	0.0	0.0	0.36	0.36	0.0
Small Heifers	0.0	0.0	0.20	0.20	0.0
Calves	0.0	0.0	0.10	0.10	0.0
Bulls	0.0	0.0	0.32	0.32	0.0
				Total	0.0
N	13 Emissions	- Lagoon/Stora	ae Pond(s)	. otai	0.0
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	16.2	16.2	5.90	5.90	0.0
Dry Cows	1.7	1.7	3.02	3.02	0.0
Support Stock (Heifers, Calves, and Bulls)	4.6	4.6	1.58	1.58	0.0
Large Heifers	0.0	0.0	1.58	1.58	0.0
Medium Hefiers	0.0	0.0	1.08	1.08	0.0
Small Heifers	0.0	0.0	0.86	0.86	0.0
Calves	0.0	0.0	0.25	0.25	0.0
Bulls	0.0	0.0	2.16	2.16	0.0
Dulla	0.0	0.0	2.10	Total	0.0
	NH2 Emissie	ons - Land App	lication	Total	0.0
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	17.6	17.6	6.41	6.41	0.0
Dry Cows	1.8	1.8	3.24	3.24	0.0
Support Stock (Heifers, Calves, and Bulls)	4.8	4.8	1.66	1.66	0.0
Large Heifers	4.0	4.0	1.66	1.66	0.0
Medium Hefiers	0.0	0.0	1.00	1.00	0.0
Small Heifers	0.0	0.0	0.94	0.94	0.0
Calves					
Bulls	0.0	0.0	0.27	0.27	0.0
Buils	0.0	0.0	2.33	2.33	0.0
				Total	0.0
		- Lagoon/Stora			
Milk Cows	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Dry Cows	1.6 0.2	1.6 0.2	0.59	0.59	0.0
Support Stock (Heifers, Calves, and Bulls)			0.30	0.30	
Support Stock (Heifers, Calves, and Bulls) Large Heifers	0.5	0.5	0.16	0.16	0.0
Medium Hefiers	0.0	0.0	0.16	0.16	0.0
Small Heifers	0.0	0.0	0.11	0.11	0.0
Calves	0.0	0.0	0.09	0.09	0.0
	0.0	0.0	0.03	0.03	0.0
Bulls					

		anure Handli			
VOC Emissi	ons - Solid Ma	nure Storage/Se	eparated Solid	ls Piles	
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	0.5	0.5	0.18	0.18	0.0
Dry Cows	0.1	0.1	0.10	0.10	0.0
Support Stock (Heifers, Calves, and Bulls)	0.2	0.2	0.10	0.08	0.0
Large Heifers	0.0	0.0	0.08	0.08	0.0
Medium Hefiers	0.0	0.0	0.05	0.05	0.0
Small Heifers	0.0	0.0	0.03	0.03	0.0
Calves	0.0	0.0	0.01	0.01	0.0
Bulls	0.0	0.0	0.05	0.05	0.0
				Total	0.0
	VOC Emissio	ons - Land Appl	ication		
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	0.8	0.8	0.30	0.30	0.0
Dry Cows	0.1	0.1	0.16	0.16	0.0
Support Stock (Heifers, Calves, and Bulls)	0.4	0.4	0.12	0.12	0.0
Large Heifers	0.0	0.0	0.12	0.12	0.0
Medium Hefiers	0.0	0.0	0.08	0.08	0.0
Small Heifers	0.0	0.0	0.05	0.05	0.0
Calves	0.0	0.0	0.02	0.02	0.0
Bulls	0.0	0.0	0.07	0.07	0.0
				Total	0.0
NH3 Emissi	ons - Solid Ma	nure Storage/Se	parated Solid	s Piles	
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	3.6	3.6	1.33	1.33	0.0
Dry Cows	0.4	0.4	0.67	0.67	0.0
Support Stock (Heifers, Calves, and Bulls)	1.0	1.0	0.35	0.35	0.0
Large Heifers	0.0	0.0	0.35	0.35	0.0
Medium Hefiers	0.0	0.0	0.25	0.25	0.0
Small Heifers	0.0	0.0	0.18	0.18	0.0
Calves	0.0	0.0	0.06	0.06	0.0
Bulls	0.0	0.0	0.49	0.49	0.0
				Total	0.0
	NH3 Emissio	ons - Land Appli	cation		
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)
Milk Cows	4.1	4.1	1.50	1.50	0.0
Dry Cows	0.4	0.4	0.76	0.76	0.0
Support Stock (Heifers, Calves, and Bulls)	1.2	1.2	0.40	0.40	0.0
Large Heifers	0.0	0.0	0.40	0.40	0.0
Medium Hefiers	0.0	0.0	0.28	0.28	0.0
Small Heifers	0.0	0.0	0.22	0.22	0.0
Calves	0.0	0.0	0.06	0.06	0.0
Bulls	0.0	0.0	0.55	0.55	0.0
				Total	0.0

	Feed Storage and Handling									
VOC Emissions - Silage										
	PE2 (lb/day) PE1 (lb/day) EF2 EF1 AIPE (lb/day)									
Corn Silage	6.8	6.8	21,155	21,155	0.0					
Alfalfa Silage	0.0	0.0	10,649	10,649	0.0					
Wheat Silage	8.6	8.6	26,745	26,745	0.0					
				Total	0.0					
	VOC E	missions - TMR								
	PE2 (lb/day)	PE1 (lb/day)	EF2	EF1	AIPE (lb/day)					
TMR	49.8	49.8	10,575	10,575	0.0					
				Total	0.0					

Pre-Project Potential to Emit (PE1)

	Pre-Project Herd Size								
Herd	Flushed Freestalls	Scraped Freestalls	Flushed Corrals	Scraped Corrals	Total # of Animals				
Milk Cows	1,000	0	0	0	1,000				
Dry Cows	200	0	0	0	200				
Support Stock (Heifers, Calves and Bulls)	1,060	0	0	0	1,060				
Large Heifers	0	0	0	0	0				
Medium Heifers	0	0	0	0	0				
Small Heifers	0	0	0	0	0				
Bulls	0	0	0	0	0		_		
		Calf Hu	tches		Calf C	orrals			
	Aboveground Flushed	Aboveground Scraped	On-Ground Flushed	On-Ground Scraped	Flushed	Scraped	Total # of Calv		
Calves	0	0	0	0	0	0	0		

		Silage Information	Silage Information									
Feed Type Maximum # Open Piles Maximum Height (ft) Maximum Width (ft) Open Face Area (ft^2)												
Corn	1	15	100	1,087								
Alfalfa	0	0	0									
Wheat	1	15	100	1,087								

Milking Parlor									
Cow	V	NH3							
Milk Cows	lb/day	lb/yr	lb/day	lb/yr					
WIIK COWS	1.1	400	0.4	137					

Cow Housing									
Cow	V	OC DC	N	-13	PM10				
	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr			
Total	43.6	15,915	79.9	29,138	48.6	17,735			

Liquid Manure Handling										
Cow	V	OC	NH	13	H2S*					
COW	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr				
Milk Cows	6.3	2,310	33.7	12,310	1.6	590				
Dry Cows	0.7	252	3.4	1,252	0.2	60				
Support Stock (Heifers, Calves and Bulls)	2.8	1,028	9.4	3,434	0.5	168				
Large Heifers	0.0	0	0.0	0	0	0				
Medium Heifers	0.0	0	0.0	0	0	0				
Small Heifers	0.0	0	0.0	0	0	0				
Calves	0.0	0	0.0	0	0	0				
Bulls	0.0	0	0.0	0	0	0				
Total	9.8	3,590	46.5	16,996	2.3	819				

Solid Manure Handling									
Cow	V	OC	NH	13					
cow	lb/day	lb/yr	lb/day	lb/yr					
Milk Cows	1.3	480	7.8	2,830					
Dry Cows	0.1	52	0.8	286					
Support Stock (Heifers, Calves and Bulls)	0.6	212	2.2	795					
Large Heifers	0.0	0	0.0	0					
Medium Heifers	0.0	0	0.0	0					
Small Heifers	0.0	0	0.0	0					
Calves	0.0	0	0.0	0					
Bulls	0.0	0	0.0	0					
Total	2.0	744	10.8	3,911					

Fee	Feed Handling and Storage							
	Daily PE (lb-VOC/day)	Annual PE (Ib-VOC/yr)						
Corn Emissions	6.8	2,471						
Alfalfa Emissions	0.0	0						
Wheat Emissions	8.6	3,124						
TMR	49.8	18,185						
Total	Total 65.2 23,780							

	Total Daily Pre-Project Potential to Emit (lb/day)											
Permit	NOx	SOx	PM10	CO	VOC	NH3	H2S					
Milking Parlor	0.0	0.0	0.0	0.0	1.1	0.4	0.0					
Cow Housing	0.0	0.0	48.6	0.0	43.6	79.9	0.0					
Liquid Manure	0.0	0.0	0.0	0.0	9.8	46.5	2.3					
Solid Manure	0.0	0.0	0.0	0.0	2.0	10.8	0.0					
Feed Handling	0.0	0.0	0.0	0.0	65.2	0.0	0.0					
Total	0.0	0.0	48.6	0.0	121.7	137.6	2.3					

	Total Annual Pre-Project Potential to Emit (Ib/yr)											
Permit	NOx	SOx	PM10	CO	VOC	NH3	H2S					
Milking Parlor	0	0	0	0	400	137	0					
Cow Housing	0	0	17,735	0	15,915	29,138	0					
Liquid Manure	0	0	0	0	3,590	16,996	819					
Solid Manure	0	0	0	0	744	3,911	0					
Feed Handling	0	0	0	0	23,780	0	0					
Total	0	0	17,735	0	44,430	50,182	819					

Calculations for milking parlor:

Annual PE = (# milk cows) x (EF1 lb-pollutant/hd-yr)

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calculations for cow housing:

See detailed calculations under Cow Housing Calculations worksheet.

Calculations for liquid manure and solid manure handling:

- Annual PE = [(# milk cows) x (EF1 lb-pollutant/hd-yr)] + [(# dry cows) x (EF1 lbpollutant/hd-yr)] + [(# large heifers) x (EF1 lb-pollutant/hd-yr)] + [(# medium heifers) x (EF1 lb-pollutant/hd-yr)] + [(# small heifers) x (EF1 lb-pollutant/hd-yr)] + [(# calves) x (EF1 lb-pollutant/hd-yr)] + [(# bulls) x (EF1 lb-pollutant/hd-yr)]
- Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

The H2S emission factor is assumed to be 10% of the NH3 lagoon/storage pond(s) emission factor, for each respective herd size.

Calculations for silage emissions:

Annual PE = (EF1) x (area ft²) x (0.0929 m²/ft²) x (8,760 hr/yr) x (60 min/hr) x 2.20E-9 lb/µg

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calculation for TMR emissions:

Annual PE = (# cows) x (EF1) x (0.658 m²) x (525,600 min/yr) x (2.20E-9 lb/µg)

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Galves are not included in TMR calculation.

*Since there will be no change to the lagoons/storage ponds surface area, no change in H2S emissions is expected. Therefore, it will be assumed that PE1 for H2S emissions is equal to PE2 for H2S emissions.

Major Source Emissions (lb/yr)										
Permit NOx SOx PM10 CO VOC										
Milk Parlor	0	0	0	0	0					
Cow Housing	0	0	0	0	0					
Liquid Manure	0	0	0	0	1,630					
Solid Manure	0	0	0	0	0					
Feed Handling	0	0	0	0	0					
Total	0	0	0	0	1,630					

Post-Project Potential to Emit (PE2)

	Post-Project Herd Size						
Herd	Flushed Freestalls	Scraped Freestalls	Flushed Corrals	Scraped Corrals	Total # of Animals		
Milk Cows	1,000	0	0	0	1,000		
Dry Cows	200	0	0	0	200		
Support Stock (Heifers, Calves, and Bulls)	1,060	0	0	0	1,060		
Large Heifers	0	0	0	0	0		
Medium Heifers	0	0	0	0	0		
Small Heifers	0	0	0	0	0		
Bulls	0	0	0	0	0		_
		Calf Hu	tches		Calf C	orrals	
	Aboveground Flushed	Aboveground Scraped	On-Ground Flushed	On-Ground Scraped	Flushed	Scraped	Total # of Calve
Calves	0	0	0	0	0	0	0

Silage Information										
Feed Type Maximum # Open Piles Maximum Height (ft) Maximum Width (ft) Open Face Area (ft^2)										
Corn	1	15	100	1,087						
Alfalfa	Alfalfa 0 0 0									
Wheat	1	15	100	1,087						

Milking Parlor									
Cow	V	OC	NH3						
Milk Cows	lb/day	lb/yr	lb/day	lb/yr					
Total	1.1 400 0.4 137								

Cow Housing									
	V	OC	NH3		PM10				
	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr			
Total	43.6								

	Liquid Manure Handling									
Cow	V	OC	NE	13	H2S					
600	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr				
Milk Cows	6.3	2,310	33.7	12,310	1.6	590				
Dry Cows	0.7	252	3.4	1,252	0.2	60				
Support Stock (Helfers, Calves, and Bulls)	2.8	1,028	9.4	3,434	0.5	168				
Large Heifers	0.0	0	0.0	0	0	0				
Medium Heifers	0.0	0	0.0	0	0	0				
Small Heifers	0.0	0	0.0	0	0	0				
Calves	0.0	0	0.0	0	0	0				
Bulls	0.0	0	0.0	0	0	0				
Total	9.8	3,590	46.5	16,996	2.3	819				

Solid Manure Handling									
Cow	V	OC	NH3						
COW	lb/day	lb/yr	lb/day	lb/yr					
Milk Cows	1.3	480	7.8	2,830					
Dry Cows	0.1	52	0.8	286					
Support Stock (Heifers, Calves, and Bulls)	0.6	212	2.2	795					
Large Heifers	0.0	0	0.0	0					
Medium Heifers	0.0	0	0.0	0					
Small Heifers	0.0	0	0.0	0					
Calves	0.0	0	0.0	0					
Bulls	0.0	0	0.0	0					
Total	2.0	744	10.8	3,911					

Fee	Feed Handling and Storage							
	Daily PE (lb-VOC/day)	Annual PE (lb-VOC/yr)						
Corn Emissions	6.8	2,471						
Alfalfa Emissions	0.0	0						
Wheat Emissions	8.6	3,124						
TMR	49.8	18,185						
Total	65.2	23,780						

	Total Daily Post-Project Potential to Emit (lb/day)									
Permit	NOx	SOx	PM10	CO	VOC	NH3	H2S			
Milking Parlor	0.0	0.0	0.0	0.0	1.1	0.4	0.0			
Cow Housing	0.0	0.0	48.6	0.0	43.6	79.9	0.0			
Liquid Manure	0.0	0.0	0.0	0.0	9.8	46.5	2.3			
Solid Manure	0.0	0.0	0.0	0.0	2.0	10.8	0.0			
Feed Handling	0.0	0.0	0.0	0.0	65.2	0.0	0.0			
Total	0.0	0.0	48.6	0.0	121.7	137.6	2.3			

Total Annual Post-Project Potential to Emit (lb/yr)									
Permit	NOx	SOx	PM10	co	VOC	NH3	H2S		
Milking Parlor	0	0	0	0	400	137	0		
Cow Housing	0	0	17,735	0	15,915	29,138	0		
Liquid Manure	0	0	0	0	3,590	16,996	819		
Solid Manure	0	0	0	0	744	3,911	0		
Feed Handling	0	0	0	0	23,780	0	0		
Total	0	0	17,735	0	44,430	50,182	819		

Calculations for milking parlor:

Annual PE = (# milk cows) x (EF2 lb-pollutant/hd-yr)

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calculations for cow housing:

See detailed calculations under Cow Housing Calculations worksheet.

Calculations for liquid manure and solid manure handling:

Annual PE = [{# milk cows} x (EF1 lb-pollutant/hd-yr]] + [{# dry cows} x (EF2 lbpollutant/hd-yr]] + [{# large heifers} x (EF2 lb-pollutant/hd-yr]] + [{# medium heifers} x (EF2 lb-pollutant/hd-yr)] + [{# small heifers}] x (EF2 lb-pollutant/hd-yr] + [{# calves} x (EF2 lb-pollutant/hd-yr]] + [{# bulls} x (EF2 lb-pollutant/hd-yr)]

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

The H2S emission factor is assumed to be 10% of the NH3 lagoon/storage pond(s) emission factor, for each respective herd size.

Calculations for silage emissions:

Annual PE = (EF2) x (area ft²) x (0.0929 m²/ft²) x (8,760 hr/yr) x (60 min/hr) x 2.20E-9 lb/ μ g

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calculation for TMR emissions:

Annual PE = (# cows) x (EF2) x (0.658 m²) x (525,600 min/yr) x (2.20E-9 lb/µg)

Daily PE = (Annual PE lb/yr) ÷ (365 day/yr)

Calves are not included in TMR calculation.

Major Source Emissions (lb/yr)									
Permit NOx SOx PM10 CO VOC									
Milk Parlor	0	0	0	0	0				
Cow Housing	0	0	0	0	0				
Liquid Manure	0	0	0	0	1,630				
Solid Manure	0	0	0	0	0				
Feed Handling	0	0	0	0	0				
Total	0	0	0	0	1,630				

Increase in Emissions

SSIPE (lb/yr)									
	NOx	SOx	PM10	СО	VOC	NH3	H2S		
Milking Parlor	0	0	0	0	0	0	0		
Cow Housing	0	0	0	0	0	0	0		
Liquid Manure	0	0	0	0	0	0	0		
Solid Manure	0	0	0	0	0	0	0		
Feed Handling	0	0	0	0	0	0	0		
Total	0	0	0	0	0	0	0		

Total Daily Change in Emissions (lb/day)										
	NOX SOX PM10 CO VOC NH3 H2S									
Milking Parlor	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Cow Housing	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Liquid Manure	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Solid Manure	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Feed Handling	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Total	0.0	0.0	0.0	0.0	0.0	0.0	0.0			

Total	Total Annual Change in Non-Fugitive Emissions (Major Source Emissions) (lb/yr)									
	NOx	SOx	PM10	СО	VOC	NH3	H2S			
Milking Parlor	0	0	0	0	0	0	0			
Cow Housing	0	0	0	0	0	0	0			
Liquid Manure	0	0	0	0	0	0	0			
Solid Manure	0	0	0	0	0	0	0			
Feed Handling	0	0	0	0	0	0	0			
Total	0	0	0	0	0	0	0			