



January 18, 2022

Dominic Patino Faial Farms 2 PO Box 456 Arvin, CA 93203

Re: Notice of Preliminary Decision - Authority to Construct Facility Number: S-6639 Project Number: S-1210005

Dear Mr. Patino:

Enclosed for your review and comment is the District's analysis of Faial Farms 2's application for an Authority to Construct for the installation of a 900 horsepower Tier 2 certified diesel-fired emergency standby internal combustion (IC) engine to provide emergency power in the event of an electrical outage, at 18683 Magnolia Ave, Shafter, CA 93263.

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. Zeferino Aleman of Permit Services at (559) 230-5844.

Sincerely,

Brian Clements

Director of Permit Services

BC:za

Enclosures

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

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

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

Agricultural Diesel-Fired Emergency Standby IC Engine

Facility Name:	Faial Farms 2	Date:	January 18, 2021
Mailing Address:		Engineer:	Zeferino Aleman
	Arvin, CA 93203	Lead Engineer:	Dustin Brown
Contact Person:	Dominic Patino		
Telephone:	(661) 333-7776		
Email:	dpatino@iconaginc.com		
Application #:	S-6639-10-0		
Project #:	S-1210005		
Complete:	May 12, 2021		

I. Proposal

Faial Farms 2 is proposing to install a 900 bhp (intermittent) diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator. The proposed engine will replace an existing 550 bhp Detroit diesel-fired emergency standby IC engine, currently operating under Permit to Operate S-6639-7-0. In order to assure that the existing engine is removed, the following condition will be placed on the ATC permit:

• Within 90 days after startup of the equipment authorized by this Authority to Construct, Permit to Operate S-6639-7-0 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201]

II. Applicable Rules

- Rule 1070 Inspections (12/17/92)
- 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 Stationary Internal Combustion Engines Phase 1 (8/21/03)
- Rule 4702 Stationary Internal Combustion Engines (8/19/21)
- Rule 4801 Sulfur Compounds (12/17/92)
- CH&SC 41700 Health Risk Assessment

CH&SC 42301.6 School Notice Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines Public Resources Code 21000-21177: California Environmental Quality Act (CEQA) California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The equipment is located at 18683 Magnolia Ave in Shafter, 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

S-6639-10-0: 900 BHP (INTERMITTENT) CATERPILLAR MODEL C18 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 manufacturer's 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)

B. Emission Factors

Emission Factors				
Pollutant	Emission Factor (g/bhp-hr)	Source		
NOx	3.80	Engine Manufacturer		
SOx	0.0051	Mass Balance Equation Below		
PM10	0.05	Engine Manufacturer		
CO	0.60	Engine Manufacturer		
VOC	0.08	Engine Manufacturer		
$0.000015lb - S$ 7.1lb - fuel $2lb - SO_2$ 1 gal 1 bhp input 2,542.5 Btu 453.6 g 0.0054 g - SO_x				

 $\frac{10000131b - 5}{lb - fuel} \times \frac{7.11b - Juel}{gallon} \times \frac{21b - 302}{11b - S} \times \frac{11b - 302}{137,000 Btu} \times \frac{10bp input}{0.35 bhp out} \times \frac{2.542.3 Bu}{bhp - hr} \times \frac{453.0 g}{lb} = 0.0051 \qquad \frac{g - 302}{bhp - hr}$

C. Calculations

1. Pre-Project Potential to Emit (PE1)

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

2. Post-Project Potential to Emit (PE2)

The daily and annual 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)
NO _x	3.80	900	24	100	181.0	754
SOx	0.0051	900	24	100	0.2	1
PM ₁₀	0.05	900	24	100	2.4	10
CO	0.60	900	24	100	28.6	119
VOC	0.08	900	24	100	3.8	16

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.

Since this is an existing facility, SSPE1 is equal to the PE1_{Total Pre-Project} from all units for all criteria pollutants.

There are eight existing permit units, no valid ATCs, and no banked ECRs at this facility. The SSPE1 for the facility is shown in the table below:

SSPE1 (lb/year)					
	NOx	SOx	PM ₁₀	со	VOC
-1-2, existing milk parlor*	0	0	0	0	1,373
-2-2, existing cow housing*	0	0	47,111	0	56,305
-3-2 liquid manure handling system*	0	0	0	0	13,705
-4-2, existing solid manure handling*	0	0	0	0	2,664
-6-1, existing feed storage and handling*	0	0	0	0	106,751
-7-0, existing 550 bhp emergency IC engine**	1,213	1	58	369	138
SSPE1	1,213	1	47,169	369	180,936

*The PE calculation for the dairy permit units are included in the Dairy Calculation Spreadsheet in Appendix F.

** The PE for Permit Unit S-6639-7-0 (existing 550 bhp emergency engine) is calculated in Appendix G.

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

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

Since this is a modification to an existing facility, SSPE2 is equal to the PE_{Total Post} Project from all units for all criteria pollutants.

SSPE2 (Ib/year)					
	NOx	SOx	PM ₁₀	со	VOC
-1-2, existing milk parlor*	0	0	0	0	1,373
-2-2, existing cow housing*	0	0	47,111	0	56,305
-3-2 liquid manure handling system*	0	0	0	0	13,705
-4-2, existing solid manure handling*	0	0	0	0	2,664
-6-1, existing feed storage and handling	0	0	0	0	106,751
-7-0, existing 550 bhp emergency IC engine	θ	θ	θ	θ	θ
-10-0, new emergency IC engine	754	1	10	119	16
SSPE2	754	1	47,121	119	180,814

For this project the change in emissions for the facility is due to the installation of the new emergency IC engine, permit unit S-6639-10, and the removal of permit unit S-6639-7-0. Thus:

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

As mentioned above and pursuant to District Rule 2201, fugitive emissions are not counted when determining if a facility is a major source unless the facility belongs to one of the specific source categories identified in the major source definition in 40 CFR Part 70.2, or when determining if a stationary source is a major source for hazardous air pollutants. Because agricultural operations do not fall under any of the specific source categories listed in 40 CFR Part 70.2, fugitive emissions are not counted when determining if an agricultural operation is a major source.

The District has determined that emissions from dairy milking parlors, cow housing units, liquid manure land application, solid manure handling, and dairy feed storage and handling are all fugitive and the only non-fugitive emissions from dairy permit

units are from the lagoons and storage ponds. Therefore, only emissions from the lagoons/storage ponds and IC engines will be used to determine if this facility is a major source.

The non-fugitive emissions from the dairy lagoons/storage ponds are calculated and shown in the dairy calculation spreadsheet in Appendix F. The following table shows the non-fugitive Stationary Source Potential to Emit for the facility.

Rule 2201 Major Source Determination (Ib/year)							
	NO _X SO _X PM ₁₀ PM _{2.5} CO VOC						
Non-Fugitive SSPE1*	1,213	1	58	58	369	6,732	
Non-Fugitive SSPE2*	754	1	10	10	119	6,610	
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000	
Major Source?	No	No	No	No	No	No	

Note: Non-Fugitive PM2.5 assumed to be equal to Non-Fugitive PM10 *The Non-Fugitive SSPE calculations are included in Appendix H.

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 each 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 potential emissions from the new engine exceed 2.0 lb/day for any pollutant.

New Emissions Unit BACT Applicability					
Pollutant	Daily Emissions for the new unit (Ib/day)	BACT Threshold (lb/day)	SSPE2 (Ib/yr)	BACT Triggered?	
NOx	181.0	> 2.0	n/a	Yes	
SOx	0.2	> 2.0	n/a	No	
PM10	2.4	> 2.0	n/a	Yes	
со	28.6	> 2.0 and SSPE2 ≥ 200,000 lb/yr	119	No	
VOC	3.8	> 2.0	n/a	Yes	

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

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

2. BACT Guideline

BACT Guideline 3.1.1, which appears in Appendix B of this report, covers 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

*Note: The certification requirements for emergency engines are as follows: $50 \le bhp < 75 - Tier 4I$; $75 \le bhp < 750 - Tier 3$; $\ge 750 bhp - Tier 2$.

The facility has proposed to install a 900 bhp Tier 2 certified IC engine (with a PM_{10} emissions rate of 0.05 g/bhp-hr), and using very low sulfur diesel fuel. Therefore, BACT is satisfied for NO_x, VOC, and PM₁₀.

B. Offsets

1. Offset Applicability

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

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

Offset Determination (lb/year)					
NOX SOX PM ₁₀ CO VOC					
SSPE2	754	1	47,121	119	180,814
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets Triggered?	No	No	Yes	No	Yes

2. Quantity of Offsets Required

As demonstrated above, District offsets are triggered for PM₁₀ and VOC, under NSR. However, since this project only involves an emergency IC engine, the offset exemption from Section 4.6.2 of District Rule 2201 is applicable to this project. In addition, the replacement of the older existing emergency IC engine (Permit # S-6639-7-0) with the proposed new emergency IC engine (Permit # S-6639-10-0) results in a net decrease in the facility's SSPE for PM₁₀ and VOC. Therefore, offsets are not required for this project and District offset calculations are not necessary.

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 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?	
NOx	1,213	754	20,000 lb/year	No	
SOx	1	1	54,750 lb/year	No	
PM10	47,169	47,121	29,200 lb/year	No	
СО	369	119	200,000 lb/year	No	
VOC	180,936	180,814	20,000 lb/year	No	

As demonstrated above, there were no offset thresholds surpassed with this project; therefore, public noticing is not required for surpassing an offset threshold.

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 unit that will generate an increase in Potential to Emit. The emissions from the proposed engine are well below 20,000 lb/year for all pollutants (See Section VII.C.2) and the project will not result in any increases in potential to emit because of the replacement of the existing IC engine with the new IC engine. Therefore, 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 for NO_x emissions in excess of 100 lb/day. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be electronically published on the District's website prior to the issuance of the ATC for this equipment.

D. Daily Emissions Limits

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

- {4771} Emissions from this IC engine shall not exceed any of the following limits: 3.80 g-NOx/bhp-hr, 0.60 g-CO/bhp-hr, or 0.08 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- {4772} Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]

E. Compliance Assurance

1. Source Testing

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

2. Monitoring

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} or $PM_{2.5}$.

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.

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

RMR Summary				
CategoriesEmergency IC Engine (Unit 10-0)Project TotalsFacility Totals				
Prioritization Score	0.92	0.92	<1	
Acute Hazard Index	n/a1	n/a¹	0.00	
Chronic Hazard Index	n/a¹	n/a¹	0.00	
Maximum Individual Cancer Risk	n/a¹	n/a¹	0.00E+00	

T-BACT Required?	No	
Special Permit Conditions?	Yes	

^{1.} The project passed with a prioritization score less than 1; therefore, no further analysis for the Risk Management Review was required.

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

- {4772} Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- {4775 modified} 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]

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.

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

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 as a mechanism to ensure compliance:

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

Rule 4701 Internal Combustion Engines - Phase 1

The purpose of this rule is to limit the emissions of nitrogen oxides (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(s) are used for the growing of crops or raising of fowl or animals, they are exempt from the requirements of this rule. Therefore, the following condition will be listed on the ATC(s) to ensure compliance.

• {GC 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]

Rule 4702 Internal Combustion Engines

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

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

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

The following conditions will be included on the permit:

- {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115]
- {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702 and 17 CCR 93115]

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

 {4775 - modified} 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]

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

4.2 Except for the requirements of Section 5.9 and Section 6.2.3, the requirements of this rule shall not apply to:

4.2.1 An emergency standby engine as defined in Section 3.0 of this rule, and provided that it is operated with a nonresettable elapsed operating time meter. In lieu of a nonresettable time meter, the owner of an emergency engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Pursuant to the exemption in Section 4.2, the following requirements of Section 5.9 are applicable to emergency standby engines

Section 5.9 requires the owner to:

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

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

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

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

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

Monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier. The following condition will be included on the permit:

• {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]

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

• {4749} This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115]

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

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

6.2.3.1 Total hours of operation,
6.2.3.2 The type of fuel used,
6.2.3.3 The purpose for operating the engine,
6.2.3.4 For emergency standby engines, all hours of non-emergency and emergency operation shall be reported, and
6.2.3.5 Other support documentation necessary to demonstrate claim to the exemption.

Records of the total hours of operation, type of fuel used, purpose for operating the engine, all hours of non-emergency and emergency operation, and other support documentation must be maintained. All records shall be retained for a period of at least

five years, shall be readily available, and be made available to the APCO upon request. The following conditions will be included on the permit:

- {3496} The permittee shall maintain monthly records of emergency and 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) = $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot \text{°R}}$

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

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
Pursuant to Section 93115.3(b), the requirements specified in Sections 93115.6, 93115.7, and 93115.10(a) do not apply to new or in-use stationary diesel-fueled CI engines used in agricultural operations.	 The following condition will be included on 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 and 4702, and 17 CCR 93115]
Emergency engine(s) must be fired on CARB diesel fuel, or an approved alternative diesel fuel.	 The applicant has proposed the use of CARB certified diesel fuel. The proposed permit condition, requiring the use of CARB certified diesel fuel, is included on the permit. {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]
The engine(s) 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).

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.

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
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.	 The following condition will be included on the permit: {4749} This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702 and 17 CCR 93115]
An owner or operator shall maintain monthly records of the following: emergency use hours of operation; maintenance and testing hours of operation; hours of operation for emission testing; initial start-up testing hours; hours of operation for all other uses; and the type of fuel used. All records shall be retained for a minimum of 36 months.	 The following conditions will be included on the permit: {3496} The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] {4263} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] {3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

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.

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(s):

• 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 (ATC) S-6639-10-0 subject to the permit conditions on the attached draft ATC in Appendix A.

X. Billing Information

Billing Schedule						
Permit Number Fee Schedule Fee Description Fee Amount						
S-6639-10-0	3020-10-E	900 bhp IC engine	\$723			

Appendixes

- A. Draft ATC
- B. BACT Guideline and BACT Analysis
- C. Manufacturer's Emissions Data Sheet
- D. RMR Memo and AAQA
- E. QNEC Calculations
- F. Dairy Emissions Calculation Spreadsheet
- G. PE Calculations for Permit S-6639-7-0
- H. Nonfugitive SSPE Calculations

Appendix A Draft ATC San Joaquin Valley Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANC

PERMIT NO: S-6639-10-0

LEGAL OWNER OR OPERATOR: FAIAL FARMS 2 MAILING ADDRESS: PO BOX 456 ARVIN. CA 93203

LOCATION:

18683 MAGNOLIA AVE SHAFTER, CA 93263

EQUIPMENT DESCRIPTION:

900 BHP (INTERMITTENT) CATERPILLAR MODEL C18 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

CONDITIONS

- 1. Within 90 days after startup of the equipment authorized by this Authority to Construct, Permit to Operate S-6639-7-0 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201]
- 2. {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]
- 3. {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]
- 4. {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]
- 5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 6. {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]

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director APCO

Brian Clements, Director of Permit Services S-6639-10-0 : Dec 14 2021 7:55AM - ALEMANZ : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

Conditions for S-6639-10-0 (continued)

- 7. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
- 8. 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]
- 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: 3.80 g-NOx/bhp-hr, 0.60 g-CO/bhp-hr, or 0.08 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- 12. Emissions from this IC engine shall not exceed 0.05 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- 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. {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]
- 18. 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]
- 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: June 13, 2019 Emergency Diesel-Fired IC Engine					
Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment		
СО	Latest EPA Tier Certification level for applicable horsepower range				
NOX	Latest EPA Tier Certification level for applicable horsepower range				
PM10	0.15 g/bhp-hr or the latest EPA Tier Certification level for applicable horsepower range, whichever is more stringent (ATCM)				
SOX	Very low sulfur diesel fuel (15 ppmw sulfur or less)				
VOC	Latest EPA Tier Certification level for applicable horsepower range				

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

Top Down BACT Analysis for the Emergency IC Engine

This application was deemed complete on May 12th, 2021. Therefore, BACT Guideline 3.1.1 (June 13, 2019) was in effect at the time the project was deemed complete and will be used for this emergency diesel IC engine. In accordance with the District BACT policy, information from that guideline will be utilized without further analysis.

1. BACT Analysis for NOx and VOC Emissions:

a. Step 1 - Identify all control technologies

BACT Guideline 3.1.1 identifies only the following option:

• Latest EPA Tier Certification level for applicable horsepower range

To determine the latest applicable Tier level, the following steps were taken:

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

Survey of Permitted Units:

The proposed emergency IC engine is rated at 900 bhp. Based on the latest survey of all permitted emergency IC engines powering electrical generators in the horsepower range applicable to the proposed unit, the District found that the Tier 4 Final certification level is the highest certification level that has been permitted for an IC engine of the size associated with the proposed project. The District currently has twenty four different existing Tier 4F and numerous Tier 3 diesel-fired IC engines permitted for emergency standby use with a rating grearer than 750 bhp.

IC Engine Availability:

The 900 bhp emergency IC engine evaluated under this project was installed in January of 2021 to replace an older emergency IC engine at the dairy to ensure that the dairy would have continuous power for operations in the event of a power outage. Dairies require continuous power for the milking operations, to power fans and misters for cooling of the cattle, and to provide refrigeration of the milk. Lack of power for the refrigeration of

milk causes milk to be unfit for human consumption and leads to substantial financial losses. Lack of power for cooling fans during extreme heat is detrimental to the health and productivity of cows. Based on information from IC engine/genset manufacturers and vendors (e.g. Cummins, Caterpillar, Kohler etc.) regarding the availability of Tier 4 Final certified units in the size range associated with the proposed project that are suitable for stationary emergency standby applications, the District determined that a Tier 4 Final certified stationary emergency standby IC engine in the size range appropriate for the proposed project was not available in the timeframe that was required for the replacement of the older engine.

Lastly, the applicant inquired about purchasing "add-on" emissions control equipment from his vendor to meet EPA Tier 4 Final emissions levels. According to Robbin Camp, a Sales Representative with Quinn Power Systems in Bakersfield, there is no approved "add-on" for the proposed unit. An approved "add-on" emissions control in this case means accepted by the engine manufacturer as an aftermarket technology such as a diesel particulate filter (DPF) or selective catalytic reduction system (SCR) which causes no harm or damage to the equipment. Any piece of equipment that has not yet been approved by Quinn Power Systems, has the potential of voiding an engine warranty.

Stationary ATCM:

Title 17 CCR, Section 93115.6(a)(3)(A) of the CARB Stationary Air Toxic Control Measure (ATCM) applies to emergency standby diesel-fired engines and requires that such engines be certified to the emission level in Table 1 (below). Please note that these emission requirements are at least as stringent or more stringent than the emission requirements in 40 CFR Subpart IIII.

Table 1: Emission Standards for New Stationary Emergency Standby Diesel-Fueled IC Engines g/bhp-hr (g/kW-hr)						
Maximum Engine PowerTierModel Year(s)PMNMHC+NOx					со	
HP > 750	2	2007	0.15 (0.20)	19(61)	26(25)	
(kW > 560)	2	2008+	0.15 (0.20)	4.8 (6.4)	2.6 (3.5)	

The ATCM does not require a Tier certification level higher than Tier 2 for engines rated greater than 750 bhp.

Summary:

The proposed standby IC engine is rated at 900 bhp. A Tier 4 Final certified stationary emergency IC engine powering an electrical generator was determined not to be readily available for the applicable horsepower range in the timeframe required for the project for replacement of the facility's previous emergency IC engine. After taking Tier 4 Final IC engine availability and Air Toxic Control Measure (ATCM) requirements into consideration, the District has determined the latest available EPA Tier certification level for the specific engine evaluated under this project is Tier 2 certification.

b. Step 2 - Eliminate technologically infeasible options

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

c. Step 3 - Rank remaining options by control effectiveness

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

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

BACT for NOx and VOC will be the use of an EPA Tier 2 certified engine. The applicant is proposing such 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 the specific engine evaluated under this project is Tier 2. Refer to the Top-Down BACT analysis for NOx and VOC for a discussion regarding the determination of the EPA Tier level to be considered.

Please note the proposed Tier 2 IC engine has a PM emission factor of 0.05 g/hp-hr. Additionally, the ATCM requires a PM emission standard of 0.15 g/hp-hr for all new emergency standby diesel IC engines.

Therefore, the proposed PM/PM10 emission factor of 0.05 g/hp-hr meets BACT requirements, and also satisfies the stationary ATCM requirement for new emergency standby diesel IC engines.

b. Step 2 - Eliminate technologically infeasible options

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

c. Step 3 - Rank remaining options by control effectiveness

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

d. Step 4 - Cost Effectiveness Analysis

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

e. Step 5 - Select BACT

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

Appendix C Manufacturer's Emissions Data Sheet



MANUFACTURER'S EMISSIONS DATA

CERTIFICATION YEAR: 2018 CERT AGENCY: EPA EPA ENGINE FAMILY NAME: JCPXL18.1NYS

MODEL: C18 GENSET RATING (W/ FAN): 600.0 EKW STANDBY 60 HERTZ @ 1800 RPM ENGINE DISCPLACEMENT: 1106.36 CU IN EMISSIONS POWER CATEGORY: 560<=KW<2237 ENGINE TYPE: 4 Stroke Compression Ignition (Diesel)

GENERAL PERFORMANCE DATA

GEN W/F	ENG PWR	FUEL RATE	FUEL RATE	EXHAUST STACK TEMP	EXHAUST GAS FLOW	
EKW	BHP	LB/BHP-HR	GPH	°F	CFM	
600.0	900.0	0.332	42.7	994.3	4784.4	

DATA REF NO.: DM8518-04

EPA D2 CYCLE CERTIFICATION

	UNITS	co	HC	NOX	NOX + HC	РМ
CERTIFICATION TEST	GM/BHP-HR	0.6	0.08	3.80	3.9	0.05
LEVELS	GM/BKW-HR	0.8	0.11	5.06	5.2	0.07
EPA Tier 2 Max	GM/BHP-HR	2.6	-	-	4.8	0.15
limits*	GM/BKW-HR	3.5	-	-	6.4	0.20

DATA REF: https://www.epa.gov/compliance-and-fuel-economy-data/annualcertification-data-vehicles-engines-and-equipment REF DATE: 02/2018

Gaseous emissions data measurements are consistent with those described in EPA 40 CFR PART 89 SUBPART D and ISO 8178 for measuring HC, CO, PM, and NOx.

*Gaseous emissions values are WEIGHTED CYCLE AVERAGES and are in compliance with the EPA non-road regulations.

Appendix D RMR Memo and AAQA

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

То:	Zeferino Aleman – Permit Services
From:	Chris Alvara – Technical Services
Date:	August 18, 2021
Facility Name:	FAIAL FARMS 2
Location:	18683 MAGNOLIA AVE, SHAFTER
Application #(s):	S-6639-10-0
Project #:	S-1210005

1. Summary

1.1 RMR

Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required	Special Permit Requirements
10	0.92	N/A ¹	N/A ¹	N/A ¹	No	Yes
Project Totals	0.92	N/A ¹	N/A ¹	N/A ¹		
Facility Totals	<1	0.00	0.00	0.00E+00		

Notes:

1. The project passed with a prioritization score less than 1; therefore, no further analysis for the Risk Management Review was required.

1.2 AAQA

Pollutant	Air Quality Standard (State/Federal)							
Fonutant	1 Hour	3 Hours	8 Hours	24 Hours	Annual			
CO	N/A ²		N/A ²					
NO _x	N/A ²				Pass			
SOx	N/A ²	N/A ²		N/A ²	Pass			
PM10				N/A ²	Pass ⁴			
PM2.5				N/A ²	Pass⁵			
Ozone	N/A ²		N/A 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 μ g/m³ for the annual concentration.

5. Modeled PM2.5 concentrations were below the District SIL for non-fugitive sources of 0.2 μ g/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 # 10-0</u>

- 1. The PM₁₀ emissions rate shall not exceed 0.05 g/bhp-hr based on US EPA certification using ISO 8178 test procedure.
- 2. 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.

2. Project Description

Technical Services received a request on August 4, 2021 to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for the following:

 Unit -10-0: 900 BHP (INTERMITTENT) CATERPILLAR MODEL C18 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

3. RMR Report

3.1 Analysis

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

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

Then, generally no further analysis is required.

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

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

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

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

These emissions were input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy, risks from the proposed unit's toxic emissions were prioritized using the procedure in the 2016 CAPCOA Facility Prioritization Guidelines. The prioritization score for this proposed unit was less

than 1.0 (see RMR Summary Table). Therefore, no further analysis for the Risk Management Review was necessary.

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 NO_2 standard, there is also a third level that can be implemented if the Level 2 analysis indicates a likely exceedance of an AAQS or SIL.

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

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

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

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

Emission Rates (lbs/hour)*						
Unit ID	Process	NOx	SOx	CO	PM10	PM2.5
1	1	N/A	N/A	N/A	N/A	N/A

* 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
1	1	753.9	1.00	119	9.90	9.90

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 2007-2011 from Wasco (rural dispersion coefficient selected) were used for the analysis:

The following parameters were used for the review:

Point Source Parameters						
Unit ID	Unit Description	Release Height (m)	Temp. (°K)	Exit Velocity (m/sec)	Stack Diameter (m)	Vertical/ Horizontal/ Capped
1	900 HP DICE	0.51	808	69.63	0.20	Vertical

5. Conclusion

5.1 RMR

The cumulative prioritization score for the facility, including this project, is less than 1.0. In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).

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

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

5.2 AAQA

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

6. Attachments

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

Appendix E QNEC Calculations

Quarterly Net Emissions Change (QNEC)

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

QNEC = PE2 - PE1, where:

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

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

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

	QNEC	
Pollutant	PE2 Total (lb/yr)	Quarterly PE2 (lb/qtr)
NOx	754	188.5
SOx	1	0.3
PM10	10	2.5
CO	119	29.8
VOC	16	4.0

PE2_{quarterly} = PE2 (lb/yr) ÷ 4 quarters/year = QNEC

Appendix F Dairy Emissions Calculation Spreadsheet

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	3,432				3,432		
Dry Cows	435		445		880		
Support Stock (Heifers, Calves, and Bulls)			4,113		4,113		
Large Heifers					0		
Medium Heifers					0		
Small Heifers					0		
Bulls					0		
	Calf Hutches			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	3,432			
Total Mature Cows	4,312			
Support Stock (Heifers, Calves, and Bulls)	4,113			
Total Calves	0			
Total Dairy Head	8,425			

Pre-Project Silage Information						
Feed Type	Feed Type Max # <u>Open</u> Piles Max Height (ft) Max Width (ft)					
Corn	2	30	150			
Alfalfa	2	30	150			
Wheat	2	30	150			

Post-Project Facility Information

1. Does this facility house Holstein or Jersey cows? Most facilities house Holstein cows unless explicitly stated on the PTO	Holstein or application.
2. Does the facility have an <u>anaerobic</u> treatment lagoon?	no
3. Does the facility land apply liquid manure?	/es

- 3. Does the facility land apply liquid manure? Answering "yes" assumes worst case
- 4. Does the facility land apply solid manure? Answering "yes" assumes worst case.

5. Is <u>any</u> 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?

yes

Post-Project Herd Size Flushed Freestalls Scraped Freestalls Flushed Corrals Scraped Corrals Total # of Animals Herd Milk Cow 3.432 3.432 Dry Cows 435 445 880 4.113 rt Stock (Heifers, Calv 4.113 Large Heifers 0 0 Medium Heifers 0 Small Heifers 0 Bulls Calf H Calf Corrals Aboveground Flushed Aboveground Scraped On-Ground Flushed Total # of Calves On-Ground Scraped Flushed Scraped Calves

no

Total Herd Summary				
Total Milk Cows	3,432			
Total Mature Cows	4,312			
Support Stock (Heifers, Calves, and Bulls)	4,113			
Total Calves	0			
Total Dairy Head	8,425			

Post-Project Silage Information						
Feed Type Max # <u>Open</u> Piles Max Height (ft) Max Width (ft)						
Corn	2	30	150			
Alfalfa	2	30	150			
Wheat	2	30	150			

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		10%	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	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%
	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.	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%
			10 /0	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 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.	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			19.00%
		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 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					

	and/or VOC emissions from silage and have been approved by the District and EPA. Total Control Efficiency*	39.00%	39.00%
	<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		
	 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. For dairies - implement two of the following: For heifer/calf ranches - implement one of the following: 	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%
	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%
V	V	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 P	Proposed?	Mitigation Measure(s) per Emissions Point	NH3 Control Efficiency (%)				
Pre-Project	Post-Project		Pre-Project	Post-Project			
		Milking Parlor Floor Mitigations					
V	V	Feed according to NRC guidelines	28%	28%			
	Total Control Efficiency			28%			

		Cow Housing		
Measure F	Proposed?	Mitigation Measure(s) per Emissions Point	NH3 Control	Efficiency (%)
Pre-Project	Post-Project	Corrals/Pens Mitigations	Pre-Project	Post-Project
		Corrals/Pens Mitigations		
		Feed according to NRC guidelines	28%	28%
		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.	0%	0%
	Total Control Efficiency		28%	28%
		Bedding Mitigations		
I	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		Pre-Project	Post-Project		
		Lagoons/Storage Ponds Mitigations				
 ✓ 	✓	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 F	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 start of the start	 Image: A start of the start of	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%									

Dairy Emission Factors

	Ib/hd-yr Dairy Emissions Factors for Holstein Cows 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) Buils Uncontrolled Controlled Controlled Controlled Uncontrolled Controlled																													
				Milk C	Cows			Dry C	ows		Large	Heifers (1	i to 24 mo	nths)	Medi	um Heifers	(7 to 14 mo	onths)	Sma	all Heifers (3	3 to 6 mor	nths)		Calves (0 -	3 months)		Bul	ls	
			Uncon	ntrolled	Contr	rolled	Uncon	trolled	Cont	rolled	Unco	ntrolled	Cont	rolled	Uncor	trolled	Cont	rolled	Uncor	ntrolled	Cont	rolled	Uncor	ntrolled	Cont	rolled	Uncon	trolled	Cont	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
	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	30.17	30.17	21.20	21.20	15.26	15.26	11.00	11.00	7.92	7.92	7.90	7.90	5.69	5.69	6.00	6.00	4.32	4.32	1.80	1.80	1.30	1.30	15.30	15.30	11.02	11.02
	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
	L L	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	38.38	38.38	27.00	27.00	19.44	19.44	14.00	14.00	10.08	10.08	10.10	10.10	7.27	7.27	7.60	7.60	5.47	5.47	2.30	2.30	1.66	1.66	19.50	19.50	14.04	14.04
		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	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
	voc	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	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.

Dairy Emission Factors

											lb/hd-	yr Dairy	Emissio	ns Facto	ors for Je	rsey Cov	/S													
				Milk C	Cows			Dry C	ows		Large	Heifers (1	5 to 24 mc	onths)	Medi	um Heifers	(7 to 14 m	onths)	Sma	II Heifers (3 to 6 mor	nths)	1	Calves (0 -	3 months)		Bul	ls	
	l be assumed to ge NH3 emissions as	nerate 71% of the amount of	Uncor	ntrolled	Cont	olled	Uncon	trolled	Cont	rolled	Uncor	trolled	Cont	rolled	Uncor	trolled	Cont	rolled	Uncon	trolled	Cont	trolled	Uncor	ntrolled	Cont	rolled	Uncor	trolled	Cont	trolled
VOC and	INFIG ETHISSIONS as	a noistein cow.	<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
		Enteric Emissions in Milking Parlors	0.31	0.29	0.26	0.26	-	-		-	-			-	-	-	-	-	Ì	-	-	-		-	-	-		-	-	-
Milking Parlor	voc	Milking Parlor Floor	0.03	0.02	0.02	0.02	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
5		Total	0.34	0.31	0.28	0.28	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
	NH3	Total	0.13	0.13	0.10	0.10	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-		-	-	-		-	-	-
		Enteric Emissions in Cow Housing	2.76	2.62	2.36	2.36	1.66	1.58	1.43	1.43	1.29	1.22	1.09	1.09	0.87	0.83	0.75	0.75	0.49	0.46	0.41	0.41	0.23	0.22	0.20	0.20	0.78	0.74	0.66	0.66
		Corrals/Pens	7.10	4.69	3.61	3.61	3.83	2.55	1.96	1.96	2.98	1.96	1.51	1.51	2.02	1.33	1.03	1.03	1.14	0.74	0.57	0.57	0.53	0.36	0.27	0.27	1.81	1.19	0.91	0.91
	voc	Bedding	0.75	0.71	0.58	0.58	0.40	0.39	0.31	0.31	0.31	0.30	0.24	0.24	0.21	0.20	0.16	0.16	0.12	0.11	0.09	0.09	0.06	0.05	0.04	0.04	0.19	0.18	0.14	0.14
		Lanes	0.60	0.57	0.46	0.46	0.32	0.31	0.25	0.25	0.25	0.24	0.19	0.19	0.17	0.16	0.13	0.13	0.10	0.09	0.07	0.07	0.04	0.04	0.03	0.03	0.15	0.14	0.12	0.12
Cow Housing		Total	11.20	8.58	7.00	7.00	6.21	4.83	3.95	3.95	4.83	3.71	3.03	3.03	3.28	2.53	2.07	2.07	1.84	1.40	1.15	1.15	0.86	0.67	0.55	0.55	2.93	2.24	1.84	1.84
cow nousing		Enteric Emissions in Cow Housing	-	-	-	-	-	-		-	-	-		-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	-
	NH3	Corrals/Pens	29.75	29.75	21.42	21.42	15.05	15.05	10.84	10.84	7.81	7.81	5.62	5.62	5.61	5.61	4.04	4.04	4.26	4.26	3.07	3.07	1.28	1.28	0.92	0.92	10.86	10.86	7.82	7.82
	NH3	Bedding	4.47	4.47	3.22	3.22	2.27	2.27	1.64	1.64	1.21	1.21	0.87	0.87	0.85	0.85	0.61	0.61	0.64	0.64	0.46	0.46	0.21	0.21	0.15	0.15	1.63	1.63	1.18	1.18
		Lanes	3.62	3.62	2.61	2.61	1.85	1.85	1.33	1.33	0.92	0.92	0.66	0.66	0.71	0.71	0.51	0.51	0.50	0.50	0.36	0.36	0.14	0.14	0.10	0.10	1.35	1.35	0.97	0.97
		Total	37.84	37.84	27.25	27.25	19.17	19.17	13.80	13.80	9.94	9.94	7.16	7.16	7.17	7.17	5.16	5.16	5.40	5.40	3.89	3.89	1.63	1.63	1.18	1.18	13.85	13.85	9.97	9.97
		Lagoons/Storage Ponds	1.08	0.92	0.83	0.83	0.58	0.50	0.45	0.45	0.45	0.39	0.35	0.35	0.31	0.26	0.24	0.24	0.17	0.15	0.13	0.13	0.08	0.07	0.06	0.06	0.28	0.23	0.21	0.21
	voc	Liquid Manure Land Application	1.16	0.99	0.89	0.89	0.63	0.54	0.49	0.49	0.49	0.42	0.37	0.37	0.33	0.28	0.25	0.25	0.19	0.16	0.14	0.14	0.09	0.08	0.07	0.07	0.30	0.25	0.22	0.22
Liquid Manure		Total	2.24	1.92	1.72	1.72	1.21	1.04	0.94	0.94	0.94	0.80	0.72	0.72	0.64	0.55	0.49	0.49	0.36	0.30	0.27	0.27	0.17	0.15	0.13	0.13	0.58	0.48	0.43	0.43
Handling		Lagoons/Storage Ponds	5.82	5.82	4.19	4.19	2.98	2.98	2.15	2.15	1.56	1.56	1.12	1.12	1.07	1.07	0.77	0.77	0.85	0.85	0.61	0.61	0.25	0.25	0.18	0.18	2.13	2.13	1.53	1.53
	NH3	Liquid Manure Land Application	6.32	6.32	4.55	4.55	3.20	3.20	2.30	2.30	1.63	1.63	1.18	1.18	1.21	1.21	0.87	0.87	0.92	0.92	0.66	0.66	0.26	0.26	0.19	0.19	2.29	2.29	1.65	1.65
		Total	12.14	12.14	8.74	8.74	6.18	6.18	4.45	4.45	3.20	3.20	2.30	2.30	2.27	2.27	1.64	1.64	1.78	1.78	1.28	1.28	0.51	0.51	0.37	0.37	4.42	4.42	3.18	3.18
		Solid Manure Storage	0.11	0.11	0.09	0.09	0.06	0.06	0.05	0.05	0.05	0.04	0.04	0.04	0.03	0.03	0.02	0.02	0.02	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.03	0.03	0.02	0.02
	voc	Separated Solids Piles	0.04	0.04	0.04	0.04	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.01	0.01	0.01	0.01
	VUC	Solid Manure Land Application	0.28	0.23	0.21	0.21	0.15	0.13	0.11	0.11	0.12	0.10	0.09	0.09	0.08	0.07	0.06	0.06	0.04	0.04	0.03	0.03	0.02	0.02	0.02	0.02	0.07	0.06	0.05	0.05
Solid Manure		Total	0.43	0.38	0.34	0.34	0.23	0.21	0.18	0.18	0.18	0.16	0.14	0.14	0.12	0.11	0.10	0.10	0.07	0.06	0.05	0.05	0.03	0.03	0.03	0.03	0.11	0.10	0.09	0.09
Handling		Solid Manure Storage	0.67	0.67	0.67	0.67	0.34	0.34	0.34	0.34	0.18	0.18	0.18	0.18	0.13	0.13	0.13	0.13	0.09	0.09	0.09	0.09	0.03	0.03	0.03	0.03	0.25	0.25	0.25	0.25
	NH3	Separated Solids Piles	0.27	0.27	0.27	0.27	0.13	0.13	0.13	0.13	0.07	0.07	0.07	0.07	0.05	0.05	0.05	0.05	0.04	0.04	0.04	0.04	0.01	0.01	0.01	0.01	0.10	0.10	0.10	0.10
	NH3	Solid Manure Land Application	1.48	1.48	1.07	1.07	0.75	0.75	0.54	0.54	0.39	0.39	0.28	0.28	0.28	0.28	0.20	0.20	0.21	0.21	0.15	0.15	0.06	0.06	0.05	0.05	0.54	0.54	0.39	0.39
		Total	2.43	2.43	2.01	2.01	1.23	1.23	1.02	1.02	0.64	0.64	0.53	0.53	0.45	0.45	0.38	0.38	0.34	0.34	0.28	0.28	0.11	0.11	0.09	0.09	0.89	0.89	0.74	0.74

	Silage and	TMR (Total Mixed Ra	tion) Emissions (µ	ug/m^2-min)	
		Silage Type	Uncontrolled	EF1	EF2
		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	43,844	26,745	26,745
		TMR	13,056	10,575	10,575
Assumptions: 1) Fac	h silage nile is com	pletely covered except for	the front face and 2) B	ations are fed within	48 hours

Assu nptions: 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 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 Cows in Freestalls	freestall	milk cows	3,432	3,432										
2	Dry Cows in Freestalls	freestall	dry cows	435	435										
3	Dry Cows in Corrals	open corral	dry cows	445	445		✓								
4	Support Stock in Corrals	open corral	support stock	4,113	4,113		V								
		Pre-Pro	ject Total # of Cows	8,425											

ĺ		Pre-Project PM10 Control Efficiencies and 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	Fibrous layer	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk	Controlled EF (lb/hd-yr)
1	Milk Cows in Freestalls	freestall	milk cows	3,432	3,432	1.370										1.37
2	Dry Cows in Freestalls	freestall	dry cows	435	435	1.370										1.37
3	Dry Cows in Corrals	open corral	dry cows	445	445	5.460	16.7%									4.55
4	Support Stock in Corrals	open corral	support stock	4,113	4,113	10.550	8.3%									9.67
		Pre-Proj	ject Total # of Cows	8,425												

Post-Project PM10 Mitigation Measures

[Post-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 Cows in Freestalls	freestall	milk cows	3,432	3,432											
2	Dry Cows in Freestalls	freestall	dry cows	435	435											
3	Dry Cows in Corrals	open corral	dry cows	445	445		V									
4	Support Stock in Corrals	open corral	support stock	4,113	4,113		M									
					Post-Project	t PM10 Mitigatio	on Measures	for New Hous	ing Units at an	Expanding Dairy						
	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	
		Post-Pro	ject Total # of Cows	8,425												

							Post-Projec	t PM10 Contro	Efficiencies an	d Emission Factors	5					
	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	Fibrous layer	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk	Controlled EF (lb/hd-yr)
1	Milk Cows in Freestalls	freestall	milk cows	3,432	3,432	1.370										1.37
2	Dry Cows in Freestalls	freestall	dry cows	435	435	1.370										1.37
3	Dry Cows in Corrals	open corral	dry cows	445	445	5.460	16.7%									4.55
4	Support Stock in Corrals	open corral	support stock	4,113	4,113	10.550	8.3%									9.67
					Post-Proj	ect PM10 Contro	ol Efficiencie	es and Emission	Factors for Ne	w Housing Emissio	ns Units					
	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	Fibrous layer	Bi-weekly scraping Corrals/Pens	Sprinkling Corrals/Pens	Feed Young Stock Near Dusk	Controlled EF (lb/hd-yr)

Pre-Project Potential to Emit - Cow Housing

				Р	Pre-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 Cows in Freestalls	milk cows	3,432	9.86	38.38	1.37	92.7	33,840	360.8	131,706	12.9	4,702
2	Dry Cows in Freestalls	dry cows	435	5.57	19.44	1.37	6.6	2,423	23.2	8,456	1.6	596
3	Dry Cows in Corrals	dry cows	445	5.57	19.44	4.55	6.8	2,479	23.7	8,651	5.5	2,024
4	Support Stock in Corrals	support stock	4,113	4.27	10.08	9.67	48.1	17,563	113.6	41,459	109.0	39,789
	Pre-Project Tota	# of Cows	8,425				154.2	56,305	521.3	190,272	129.0	47,111

*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)									
8,425 154.2 56,305 521.3 190,272 129.0 47,111									

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 Cows in Freestalls	milk cows	3,432	9.86	38.38	1.37	92.7	33,840	360.8	131,706	12.9	4,702	
2	Dry Cows in Freestalls	dry cows	435	5.57	19.44	1.37	6.6	2,423	23.2	8,456	1.6	596	
3	Dry Cows in Corrals	dry cows	445	5.57	19.44	4.55	6.8	2,479	23.7	8,651	5.5	2,024	
4	Support Stock in Corrals	support stock	4,113	4.27	10.08	9.67	48.1	17,563	113.6	41,459	109.0	39,789	
	Post-Project # of Cows	(non-expansion)	8,425				154.2	56,305	521.3	190,272	129.0	47,111	

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

	Post-Project Potential to Emit - Cow Housing: New Housing Units at an Expanding Dairy										
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)
Total # of Cows Fr	Total # of Cows From Expansion 0					0.0	0	0.0	0	0.0	0

*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										
8,425	154.2	56,305	521.3	190,272	129.0	47,111				

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 Potential to Emit (PE2)

		Post-Project He	erd Size				
Herd	Flushed Freestalls	Scraped Freestalls	Flushed Corrals	Scraped Corrals	Total # of Animals		
Milk Cows	3,432	0	0	0	3,432		
Dry Cows	435	0	445	0	880		
Support Stock (Heifers, Calves, and Bulls)	0	0	4,113	0	4,113		
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 Calves
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	2	30	150	6,814
Alfalfa	2	30	150	6,814
Wheat	2	30	150	6,814

Milking Parlor								
Cow	V	NH3						
Milk Cows	lb/day	lb/day lb/yr		lb/yr				
Total	3.8	1,373	1.3	469				

Cow Housing									
	V	0C	NH	13	PM10				
	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr			
Total	154.2	56,305	521	190,272	129	47,111			

	Li	quid Manur	e Handling				
Cow	V	OC	NE	13	H2S		
COW	lb/day	lb/yr	lb/day	lb/yr	lb/day	lb/yr	
Milk Cows	22.8	8,340	115.7	42,248	5.6	2,026	
Dry Cows	3.2	1,170	15.1	5,509	0.7	266	
Support Stock (Helfers, Calves, and Bulls)	11.5	4,195	36.5	13,326	1.8	651	
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	37.5	13,705	167.3	61,083	8.1	2,944	

S	olid Manur	e Handling			
Cow	V	OC	NH3		
cow	lb/day	lb/yr	lb/day	lb/yr	
Milk Cows	4.4	1,613	26.6	9,713	
Dry Cows	0.6	229	3.4	1,258	
Support Stock (Heifers, Calves, and Bulls)	2.3	823	8.5	3,085	
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	7.3	2,664	38.5	14,056	

Feed Handling and Storage							
	Daily PE (lb-VOC/day) Annual PE (lb-VOC/yr)						
Corn Emissions	42.4	15,486					
Alfalfa Emissions	10.7	3,898					
Wheat Emissions	53.6	19,577					
TMR	185.7	67,791					
Total	292.4	106,751					

	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	3.8	1.3	0.0		
Cow Housing	0.0	0.0	129.0	0.0	154.2	521.3	0.0		
Liquid Manure	0.0	0.0	0.0	0.0	37.5	167.3	8.1		
Solid Manure	0.0	0.0	0.0	0.0	7.3	38.5	0.0		
Feed Handling	0.0	0.0	0.0	0.0	292.4	0.0	0.0		
Total	0.0	0.0	129.0	0.0	495.2	728.4	8.1		

	Total Annual Post-Project Potential to Emit (lb/yr)							
Permit	NOx	SOx	PM10	co	VOC	NH3	H2S	
Milking Parlor	0	0	0	0	1,373	469	0	
Cow Housing	0	0	47,111	0	56,305	190,272	0	
Liquid Manure	0	0	0	0	13,705	61,083	2,944	
Solid Manure	0	0	0	0	2,664	14,056	0	
Feed Handling	0	0	0	0	106,751	0	0	
Total	0	0	47,111	0	180,799	265,880	2,944	

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	6,594		
Solid Manure	0	0	0	0	0		
Feed Handling	0	0	0	0	0		
Total	0	0	0	0	6,594		

Assumptions

- The VOC emission factors for the dairy animals are based on the District document entitled "Air Pollution Control Officer's Revision of the Dairy VOC Emissions Factor."
- The NH3 emission factors for milk cows are based on an internal document entitled "Breakdown of Dairy VOC Emission Factor into Permit Units." The NH3 emission factors for the other cows were developed by taking the ratio of manure generated by the different types of cows to the milk cow and multiplying it by the milk cow emission factor.
- 16.7% PM10 control efficiency applied for milk cows and dry cows housed in shaded corrals.
- 8.3% PM10 control efficiency applied for support stock (heifers, calves, and bulls) housed in shaded corrals.
- Unless calculated separately, H2S emissions are assumed to be 10% of the lagoon/storage pond(s) NH3 emissions.
- When applying PM10 control efficiency from shade structures, it is assumed the number of cows housed in each corral is equally distributed. E.g., if there are 1,000 support stock and 10 corrals, it is assumed each corral houses 100 support stock.
- Jersey cows are assumed to generate 71% of the amount of VOC and NH3 emissions as a Holstein cow.
- Calculations for Support Stock (heifers and bulls) use emission factors for large heifers.
- If <u>no</u> scraped manure is flushed to a lagoon, then emissions from the scraped manure are excluded from the liquid manure handling permit calculations.
- Of the permit units addressed in this spreadsheet, only emissions from the lagoon/storage pond(s) are used for major source calculations since these emissions are considered to be the only non-fugitive emissions.
- All mitigation measures are expected to result in VOC emission reductions. A conservative 10% control efficiency will be applied to all mitigation measures unless specifically noted.
- An anaerobic treatment lagoon designed in accordance with the NRCS Guideline (359) has the potential of reducing significant amount of emissions. Although VOC emission reductions are expected to be high, to be conservative, a control efficiency of 40% will be applied to this mitigation measure for both the lagoon(s) and land application until better data becomes available.
- The mitigation measures chosen will also have a reduction in ammonia emissions. However, due to limited data, these reductions will not be quantified at this time.
- Unless otherwise indicated, no scraped manure is sent to the lagoon(s).
- Fugitive greenhouse gas emissions are excluded in calculations for PSD purposes.
- Saudi style barns will be given the same PM10 uncontrolled EF as a freestall.
- Loafing barns will be given 50% of the uncontrooled PM10 EF as an open corral.

Appendix G PE Calculations for Permit S-6639-7-0

PE Calculations for Permit S-6639-7-0

A. Assumptions

Non-emergency operating schedule:100 hours/year (Current Permit)Density of diesel fuel:7.1 lb/galFuel heating value:137,000 Btu/galBHP to Btu/hr conversion:2,542.5 Btu/hp·hrThermal efficiency of engine:commonly $\approx 35\%$ for diesel engines

B. Emission Factors

Emission Factors					
Pollutant Emission Factor (g/bhp-hr) Source					
NOx	10.00	Project S-1080010			
SO _X 0.0051 Mass Balance Equation Belo		Mass Balance Equation Below			
PM ₁₀ 0.475 Project S-1080010					
CO 3.04 Project S-1080010		Project S-1080010			
VOC	1.14	Project S-1080010			

Emission factors for permit unit S-6639-7-0 are provided in the table below.

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

C. Calculations

The daily and annual PE1 are calculated as follows:

Annual PE1 (lb-pollutant/yr) = EF (g-pollutant/bhp-hr) x rating (bhp) x operation (hr/yr) / 453.6 g/lb

	Daily & Annual Emissions for S-6639-7-0								
Pollutant	Emissions Factor (g/bhp-hr)	Factor Rating (bhp)		Annual PE (lb/yr)					
NOx	10.00	550	100	1,213					
SOx	0.0051	550	100	1					
PM10	0.475	550	100	58					
CO	3.04	550	100	369					
VOC	1.14	550	100	138					

Appendix H Nonfugitive SSPE Calculations

Non-Fugitive SSPE1 (lb/year)							
NOx SOx PM10 CO VOC							
-7-0, existing 550 bhp emergency IC engine	1,213	1	58	369	138		
liquid manure	0	0	0	0	6,594		
Non-Fugitive SSPE 1 (lb/year) 1,213 1 58 369 6,732							

Non-Fugitive SSPE2 (lb/year)							
	NOx	SOx	PM ₁₀	СО	VOC		
-10-0, new 900 bhp emergency IC engine	754	1	10	119	16		
liquid manure	0	0	0	0	6,594		
Non-Fugitive SSPE 1 (Ib/year)	754	1	10	119	6,610		