FEB 16 2011

Robert Vogel
Comcast Cable Communications, Inc
2441 N Grove Industrial Drive
Fresno, CA 93727

Re: Notice of Preliminary Decision - Authority to Construct
Project Number: C-1103848

Dear Mr. Vogel:

Enclosed for your review and comment is the District's analysis of Comcast Cable Communications, Inc's application for an Authority to Construct for 755 bhp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator, at 2096 N Gateway Drive in Fresno, CA.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Ms. Gurpreet Brar of Permit Services at (559) 230-5926.

Sincerely,

David Warner
Director of Permit Services

DW:gb

Enclosures
FEB 16 2011

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

Re: Notice of Preliminary Decision - Authority to Construct
Project Number: C-1103848

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Comcast Cable Communications, Inc's application for an Authority to Construct for 755 bhp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator, at 2096 N Gateway Drive in Fresno, CA.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Ms. Gurpreet Brar of Permit Services at (559) 230-5926.

Sincerely,

David Warner
Director of Permit Services

DW:gb

Enclosure
NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
AN AUTHORITY TO CONSTRUCT

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Authority to Construct to Comcast Cable Communications, Inc for 755 bhp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator, at 2096 N Gateway Drive in Fresno, CA.

The analysis of the regulatory basis for this proposed action, Project #C-1103848, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.
San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review
Diesel-Fired Emergency Standby IC Engine

Facility Name: Comcast Cable Communications, Inc
Mailing Address: 2441 N Grove Industrial Drive
                Fresno, CA 93727
Contact Person: Robert Vogel
Telephone: (559) 253-4777
Application #: C-3114-2-0
Project #: C-1103848
Complete: January 12, 2011

Date: February 9, 2011
Engineer: Gurpreet Brar
Lead Engineer: Martin Keast

I. Proposal

Comcast Cable Communications, Inc is proposing to install a 755 bhp diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (12/18/08)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
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 – Phase 2 (1/18/07)
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
California Environmental Quality Act (CEQA)
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines
III. Project Location

The project is located at 2096 N Gateway Drive in Fresno, CA.

IV. Process Description

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

V. Equipment Listing

C-3114-2-0: 755 BHP CUMMINS MODEL QSX15-G9 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 (0.0015% by weight sulfur maximum).

The proposed engine(s) meet the latest Tier Certification requirements; therefore, the engine(s) meets the latest ARB/EPA emissions standards for diesel particulate matter, hydrocarbons, nitrogen oxides, and carbon monoxide (see Appendix C for a copy of the emissions data sheet and/or the ARB/EPA executive order).

The use of very low-sulfur diesel fuel (0.0015% by weight sulfur maximum) reduces SO\textsubscript{X} emissions by over 99% from standard diesel fuel.

VII. General Calculations

A. Assumptions

<table>
<thead>
<tr>
<th>Assumption</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency operating schedule</td>
<td>24 hours/day</td>
</tr>
<tr>
<td>Non-emergency operating schedule</td>
<td>50 hours/year</td>
</tr>
<tr>
<td>Density of diesel fuel</td>
<td>7.1 lb/gal</td>
</tr>
<tr>
<td>EPA F-factor (adjusted to 60 °F)</td>
<td>9,051 dscf/MMBtu</td>
</tr>
<tr>
<td>Fuel heating value</td>
<td>137,000 Btu/gal</td>
</tr>
<tr>
<td>BHP to Btu/hr conversion</td>
<td>2,542.5 Btu/bhp-hr</td>
</tr>
<tr>
<td>Thermal efficiency of engine</td>
<td>commonly ≈ 35%</td>
</tr>
<tr>
<td>PM\textsubscript{10} fraction of diesel exhaust</td>
<td>0.96 (CARB, 1988)</td>
</tr>
</tbody>
</table>

The engine has certified NO\textsubscript{X} + VOC emissions of 4.25 g/bhp-hr. It will be assumed the NO\textsubscript{X} + VOC emission factor is split 95% NO\textsubscript{X} and 5% VOC (per the District's Carl Moyer program).
B. Emission Factors

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (g/bhp-hr)</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{x}</td>
<td>4.04</td>
<td>ARB/EPA Certification</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
<td>0.0051</td>
<td>Mass Balance Equation Below</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>0.10</td>
<td>ARB/EPA Certification</td>
</tr>
<tr>
<td>CO</td>
<td>0.52</td>
<td>ARB/EPA Certification</td>
</tr>
<tr>
<td>VOC</td>
<td>0.21</td>
<td>ARB/EPA Certification</td>
</tr>
</tbody>
</table>

\[
\frac{0.000015 \text{ lb - S}}{\frac{7.1\text{ lb - fuel}}{\text{gallon}}} \times \frac{2 \text{ lb - SO}_2}{\text{gallon}} \times \frac{1 \text{ gal}}{137,000 \text{ Btu}} \times \frac{1 \text{ bhp input}}{2,542.5 \text{ Btu}} \times \frac{2,542.5 \text{ Btu}}{0.35 \text{ bhp output}} \times \frac{453.6 \text{ g}}{\text{bhp - hr}} = 0.0051 \frac{\text{g - SO}_2}{\text{lb - hr}}
\]

C. Calculations

1. Pre-Project Emissions (PE1)

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

2. Post-Project PE (PE2)

The daily and annual PE are calculated as follows:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emissions Factor (g/bhp-hr)</th>
<th>Rating (bhp)</th>
<th>Daily Hours of Operation (hrs/day)</th>
<th>Annual Hours of Operation (hrs/yr)</th>
<th>Daily PE2 (lb/day)</th>
<th>Annual PE2 (lb/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{x}</td>
<td>4.04</td>
<td>755</td>
<td>24</td>
<td>50</td>
<td>161.4</td>
<td>336</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
<td>0.0051</td>
<td>755</td>
<td>24</td>
<td>50</td>
<td>0.2</td>
<td>0</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>0.1</td>
<td>755</td>
<td>24</td>
<td>50</td>
<td>4.0</td>
<td>8</td>
</tr>
<tr>
<td>CO</td>
<td>0.52</td>
<td>755</td>
<td>24</td>
<td>50</td>
<td>20.8</td>
<td>43</td>
</tr>
<tr>
<td>VOC</td>
<td>0.21</td>
<td>755</td>
<td>24</td>
<td>50</td>
<td>8.4</td>
<td>17</td>
</tr>
</tbody>
</table>
3. Pre-Project Stationary Source Potential to Emit (SSPE1)

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

SSPE1 is summarized in the following table. See Appendix F for detailed SSPE calculations.

<table>
<thead>
<tr>
<th>SSPE1 Total</th>
<th>NO\textsubscript{X} (lb/yr)</th>
<th>SO\textsubscript{X} (lb/yr)</th>
<th>PM\textsubscript{10} (lb/yr)</th>
<th>CO (lb/yr)</th>
<th>VOC (lb/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSPE1 Total</td>
<td>233</td>
<td>0</td>
<td>19</td>
<td>120</td>
<td>45</td>
</tr>
</tbody>
</table>

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

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid ATCs or PTOs, except for emissions units proposed to be shut down as part of the Stationary Project, at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

For this project the change in emissions for the facility is due to the installation of the new emergency standby IC engine, permit unit -2-0. Thus:

<table>
<thead>
<tr>
<th>SSPE2</th>
<th>NO\textsubscript{X} (lb/yr)</th>
<th>SO\textsubscript{X} (lb/yr)</th>
<th>PM\textsubscript{10} (lb/yr)</th>
<th>CO (lb/yr)</th>
<th>VOC (lb/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSPE1</td>
<td>233</td>
<td>0</td>
<td>19</td>
<td>120</td>
<td>45</td>
</tr>
<tr>
<td>C-3114-2-0</td>
<td>336</td>
<td>0</td>
<td>8</td>
<td>43</td>
<td>17</td>
</tr>
<tr>
<td>SSPE2 Total</td>
<td>569</td>
<td>0</td>
<td>27</td>
<td>163</td>
<td>62</td>
</tr>
<tr>
<td>Offset Threshold</td>
<td>20,000</td>
<td>54,750</td>
<td>29,200</td>
<td>200,000</td>
<td>20,000</td>
</tr>
<tr>
<td>Offset Threshold Surpassed?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>
5. Major Source Determination

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

This facility does not contain ERCs which have been banked at the source; therefore, no adjustment to SSPE2 is necessary.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>SSPE1 (lb/yr)</th>
<th>SSPE2 (lb/yr)</th>
<th>Major Source Threshold (lb/yr)</th>
<th>Existing Major Source?</th>
<th>Becoming a Major Source?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{X}</td>
<td>233</td>
<td>569</td>
<td>20,000</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>SO\textsubscript{X}</td>
<td>0</td>
<td>0</td>
<td>140,000</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>19</td>
<td>27</td>
<td>140,000</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>120</td>
<td>163</td>
<td>200,000</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>45</td>
<td>62</td>
<td>20,000</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

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

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 Section 3.22

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

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."

As discussed in Section VII.C.5 previously, the facility is not a Major Source for any criteria pollutant; therefore, the project does not constitute a Major Modification.

8. Federal Major Modification

As shown in the previous section, this project does not constitute a Major Modification. Therefore, in accordance with District Rule 2201, Section 3.17, this project does not constitute a Federal Major Modification and no further discussion is required.

9. Quarterly Net Emissions Change (QNEC)

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

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the 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 a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.
As discussed in Section I, the facility is proposing to install a new emergency standby IC engine. Additionally, as determined in Section VII.C.7, this project does not result in a Major Modification. Therefore, BACT can only be triggered if the daily emissions exceed 2.0 lb/day for any pollutant.

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

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Daily Emissions for unit -2-0 (lb/day)</th>
<th>BACT Threshold (lb/day)</th>
<th>SSPE2 (lb/yr)</th>
<th>BACT Triggered?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{X}</td>
<td>161.4</td>
<td>&gt; 2.0</td>
<td>n/a</td>
<td>Yes</td>
</tr>
<tr>
<td>SO\textsubscript{X}</td>
<td>0.2</td>
<td>&gt; 2.0</td>
<td>n/a</td>
<td>No</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>4.0</td>
<td>&gt; 2.0</td>
<td>n/a</td>
<td>Yes</td>
</tr>
<tr>
<td>CO</td>
<td>20.8</td>
<td>SSPE2 ≥ 200,000 lb/yr</td>
<td>0</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>8.4</td>
<td>&gt; 2.0</td>
<td>n/a</td>
<td>Yes</td>
</tr>
</tbody>
</table>

As shown above, BACT will be triggered for NO\textsubscript{X}, PM\textsubscript{10} and VOC emissions from the engine for this project.

2. BACT Guideline

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

3. Top Down BACT Analysis

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

Pursuant to the attached Top-Down BACT Analysis, which appears in Appendix B of this report, BACT is satisfied with:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{X}</td>
<td>Latest EPA Tier Certification level for applicable horsepower range</td>
</tr>
<tr>
<td>SO\textsubscript{X}</td>
<td>Very low sulfur diesel (15 ppmw sulfur or less)</td>
</tr>
<tr>
<td>VOC</td>
<td>Latest EPA Tier Certification level for applicable horsepower range</td>
</tr>
</tbody>
</table>

The following condition will be listed on the ATC to ensure compliance with the PM\textsubscript{10} BACT emissions limit:
• Emissions from this IC engine shall not exceed 0.10 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, 40 CFR Part 60 Subpart III]

B. Offsets

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

C. Public Notification

1. Applicability

Public noticing is required for:

a. Any new Major Source, which is a new facility that is also a Major Source
   As shown in Section VII.C.6, this facility is not a new Major Source.

b. Major Modifications
   As shown in Section VII.C.7, this project is not a Major Modification.

c. Any new emissions unit with a Potential to Emit greater than 100 lb/day for any one pollutant
   As calculated in Section VII.C.2, daily emissions for NOx are greater than 100 lb/day.

d. Any project which results in the offset thresholds being surpassed
   As shown in Section VII.C.4, an offset threshold will not be surpassed.

e. Any project with an Stationary Source project Increase in Potential (SSIPE) Emissions greater than 20,000 lb/year for any pollutant.

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

As demonstrated above, this project will require public noticing. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation 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 Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. Therefore, the following conditions will be listed on the ATC to ensure compliance:

- Emissions from this IC engine shall not exceed any of the following limits: 4.04 g-NOx/bhp-hr, 0.52 g-CO/bhp-hr, or 0.21g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]

- Emissions from this IC engine shall not exceed 0.10 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]

- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]

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)

Section 4.14.1 of this rule requires that an ambient air quality analysis (AAQA) 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 Technical Services Division of the SJVAPCD conducted the required analysis.

As shown by the AAQA summary sheet in Appendix D, the proposed equipment will not cause or make worse a violation of an air quality standard for NO\textsubscript{x}, CO, PM10, or SO\textsubscript{x}.

Rule 2520 Federally Mandated Operating Permits

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

Rule 4001 New Source Performance Standards (NSPS)

40 CFR 60 Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The following table demonstrates how the proposed engine(s) will comply with the requirements of 40 CFR Part 60 Subpart III.

<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Engine(s) must meet the appropriate Subpart III emission standards for new engines, based on the model year, size, and number of liters per cylinder.</td>
<td>The applicant has proposed the use of engine(s) that are certified to the latest EPA Tier Certification level for the applicable horsepower range, guaranteeing compliance with the emission standards of Subpart III.</td>
</tr>
<tr>
<td>Engine(s) must be fired on 500 ppm sulfur content fuel or less, and fuel with a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume. Starting in October 1, 2010, the maximum allowable sulfur fuel content will be lowered to 15 ppm.</td>
<td>The applicant has proposed the use of CARB certified diesel fuel, which meets all of the fuel requirements listed in Subpart III. A permit condition enforcing this requirement was included earlier in this evaluation.</td>
</tr>
</tbody>
</table>
The operator/owner must install a non-resettable hour meter prior to startup of the engine(s).

The applicant has proposed to install a non-resettable hour meter. The following condition will be included on the permit:
- This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart III]

Emergency engine(s) may be operated for the purpose of maintenance and testing up to 100 hours per year. There is no limit on emergency use.

The Air Toxic Control Measure for Stationary Compression Ignition Engines (Stationary ATCM) limits this engine maintenance and testing to 50 hours/year. Thus, compliance is expected.

The owner/operator must operate and maintain the engine(s) and any installed control devices according to the manufacturers written instructions.

The following condition will be included on the permit:
- 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 and 40 CFR 60 Subpart III]

Rule 4002 National Emission Standards for Hazardous Air Pollutants


Emergency engines are subject to this subpart if they are operated at a major or area source of Hazardous Air Pollutant (HAP) emissions. A major source of HAP emissions is a facility that has the potential to emit any single HAP at a rate of 10 tons/year or greater or any combinations of HAPs at a rate of 25 tons/year or greater. An area source of HAPs is a facility is not a major source of HAPs. The proposed engine(s) are new stationary RICE located at an area source of HAP emissions; therefore, these engines are subject to this Subpart.

40 CFR 63 Subpart ZZZZ requires the following engines to comply with 40 CFR 60 Subpart III:

1. New emergency engines located at area sources of HAPs
2. Emergency engines rated less than or equal to 500 bhp and located at major sources of HAPs

The proposed engine will be in compliance with 40 CFR 60 Subpart III.
Additionally, 40 CFR 63 Subpart ZZZZ requires engines rated greater 500 bhp and located at major sources of HAPs to meet the notification requirements of §63.6645(h); however, that section only applies if an initial performance test is required. Since an initial performance test is not required for emergency engines, the notification requirement is not applicable.

The proposed engines are expected to be in compliance with 40 CFR 63 Subpart ZZZZ.

**Rule 4101  Visible Emissions**

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

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

**Rule 4102  Nuisance**

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

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

**California Health & Safety Code 41700 (Health Risk Assessment)**

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources (dated 3/2/01) specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite. Therefore, a risk management review (RMR) was performed for this project. The RMR results are summarized in the following table, and can be seen in detail in Appendix D.

<table>
<thead>
<tr>
<th>Unit</th>
<th>Acute Hazard Index</th>
<th>Chronic Hazard Index</th>
<th>Cancer Risk</th>
<th>T-BACT Required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-3114-2-0</td>
<td>N/A</td>
<td>N/A</td>
<td>0.94 in a million</td>
<td>No</td>
</tr>
</tbody>
</table>
The following conditions will be listed on the ATC to ensure compliance with the RMR:

- {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]

- Emissions from this IC engine shall not exceed 0.1 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, 40 CFR Part 60 Subpart III]

- The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per year. [District NSR Rule and District Rule 4702]

- The stack height shall be 16 feet. [District Rule 4102]

**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.

\[
0.1 \frac{\text{grain-}PM}{\text{dscf}} \times \frac{g}{15.43 \text{ grain}} \times \frac{1 \text{ Btu}_{\text{in}}}{0.35 \text{ Btu}_{\text{out}}} \times \frac{9.051 \text{ dscf}}{10^6 \text{ Btu}} \times \frac{2,542.5 \text{ btu}}{1 \text{ bhp-}hr} \times \frac{0.96g-PM_{10}}{1g-PM} = 0.4 \frac{g-PM_{10}}{\text{bhp-}hr}
\]

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

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

**Rule 4701  Internal Combustion Engines – Phase 1**

Pursuant to Section 7.5.2.3 of District Rule 4702, as of June 1, 2006 District Rule 4701 is no longer applicable to diesel-fired emergency standby or emergency IC engines. Therefore, the proposed emergency internal combustion engine(s) will comply with the requirements of District Rule 4702 and no further discussion is required.
Rule 4702  Internal Combustion Engines – Phase 2

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

<table>
<thead>
<tr>
<th>District Rule 4702 Requirements Emergency Standby IC Engines</th>
<th>Proposed Method of Compliance with District Rule 4702 Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operation of emergency standby engines is limited to 100 hours or less per calendar year for non-emergency purposes, verified through the use of a non-resettable elapsed operating time meter.</td>
<td>The Air Toxics Control Measure for Stationary Compression Ignition Engines (Stationary ATCM) limits this engine maintenance and testing to 50 hours/year. Thus, compliance is expected.</td>
</tr>
</tbody>
</table>
| Emergency standby engines cannot be used to reduce the demand for electrical power when normal electrical power line service has not failed, or to produce power for the electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract. | The following conditions will be included on the permit:  
- {3807} An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]  
- {3808} This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] |
| The owner/operator must operate and maintain the engine(s) and any installed control devices according to the manufacturers written instructions. | A permit condition enforcing this requirement was shown earlier in the evaluation. |
| The owner/operator must monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier. | The following condition will be included on the permit:  
- {3478} During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] |
Records of the total hours of operation of the emergency standby engine, type of fuel used, purpose for operating the engine, all hours of non-emergency and emergency operation, and support documentation must be maintained. All records shall be retained for a period of at least five years, shall be readily available, and be made available to the APCO upon request.

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]**

- The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]

- **{3475} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]**

### Rule 4801  Sulfur Compounds

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

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

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

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

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

\[
\frac{0.000015 \text{ lb} - \text{S}}{\text{lb - fuel}} \times \frac{7.1 \text{ lb}}{\text{ gal}} \times \frac{64 \text{ lb} - \text{SO}_2}{1 \text{ MMBtu}} \times \frac{1 \text{ MMBtu}}{1 \text{ gal}} \times \frac{1 \text{ gal}}{\text{ lb - mol}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb - mol} \cdot \degree R} \times \frac{520 \degree R}{1,000,000} = 1.0 \text{ ppmv}
\]

Since 1.0 ppmv is ≤ 2,000 ppmv, this engine is expected to comply with Rule 4801. Therefore, the following condition will be listed on the ATC to ensure compliance:
Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]

California Health & Safety Code 42301.6 (School Notice)

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

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

The following table demonstrates how the proposed engine(s) will comply with the requirements of Title 17 CCR Section 93115.

<table>
<thead>
<tr>
<th>Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators</th>
<th>Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency engine(s) must be fired on CARB diesel fuel, or an approved alternative diesel fuel.</td>
<td>The applicant has proposed the use of CARB certified diesel fuel. The proposed permit condition, requiring the use of CARB certified diesel fuel, was included earlier in this evaluation.</td>
</tr>
<tr>
<td>The engine(s) must emit diesel PM at a rate less than or equal to 0.15 g/bhp-hr or must meet the diesel PM standard, as specified in the Off-road compression ignition standards for off-road engines with the same maximum rated power (Title 13 CCR, Section 2423).</td>
<td>The applicant has proposed the use of engine(s) that are certified to the latest EPA Tier Certification level for the applicable horsepower range, guaranteeing compliance with the emission standards of Subpart III. Additionally, the proposed diesel PM emissions rate is less than or equal to 0.15 g/bhp-hr.</td>
</tr>
<tr>
<td>The engine may not be operated more than 50 hours per year for maintenance and testing purposes.</td>
<td>The following condition will be included on the permit:</td>
</tr>
<tr>
<td></td>
<td>• This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII]</td>
</tr>
<tr>
<td>New stationary emergency standby diesel-fueled CI engines (&gt; 50 bhp) must meet the standards for off-road engines of the same model year and maximum rated power as specified in the Off-Road Compression Ignition Engine Standards (title 13, CCR, section 2423).</td>
<td>The applicant has proposed the use of engine(s) that are certified to the latest EPA Tier Certification level for the applicable horsepower range.</td>
</tr>
</tbody>
</table>
Engines, with a PM10 emissions rate greater than 0.01 g/bhp-hr and located at schools, may not be operated for maintenance and testing whenever there is a school sponsored activity on the grounds. Additionally, engines located within 500 feet of school grounds may not be operated for maintenance and testing between 7:30 AM and 3:30 PM.

The District has verified that this engine is not located within 500’ of a school.

An owner or operator shall maintain monthly records of the following: emergency use hours of operation; maintenance and testing hours of operation; hours of operation for emission testing; initial start-up testing hours; hours of operation for all other uses; and the type of fuel used. All records shall be retained for a minimum of 36 months.

Permit conditions enforcing these requirements were shown earlier in the evaluation.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its Environmental Review Guidelines (ERG) in 2001.

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas Significance Determination

The District’s engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions (See Appendix G). The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.
District CEQA Findings

Consistent with California Environmental Quality Act (CEQA) and CEQA Guidelines requirements, the San Joaquin Valley Air Pollution Control District (District) has adopted procedures and guidelines for implementing CEQA. The District's Environmental Review Guidelines (ERG) establishes procedures for avoiding unnecessary delay during the District's permitting process while ensuring that significant environmental impacts are thoroughly and consistently addressed. The ERG includes policies and procedures to be followed when processing permits for projects that are exempt under CEQA.

The State Legislature granted a number of exemptions from CEQA, including projects that require only ministerial approval. Based upon analysis of its own laws and consideration of CEQA provisions, the District has identified a limited number of District permitting activities considered to be ministerial approvals. As set forth in §4.2.1 of the ERG, projects permitted consistent with the District's Guidelines for Expedited Application Review (GEAR) are standard application reviews in which little or no discretion is used in issuing Authority to Construct (ATC) documents.

For the proposed project, the District performed an Engineering Evaluation (this document) and determined that the project qualifies for processing under the procedures set forth in the District's Permit Services Procedures Manual in the Guidelines for Expedited Application Review (GEAR). Thus, as discussed above, this issuance of such ATC is a ministerial approval for the District and is not subject to CEQA provisions.

IX. Recommendation

Pending a successful NSR Public Noticin period, issue Authority to Construct C-3114-2-0 subject to the permit conditions on the attached draft Authority to Construct in Appendix A.

X. Billing Information

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Fee Schedule</th>
<th>Fee Description</th>
<th>Fee Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-3114-2-0</td>
<td>3020-10-D</td>
<td>755 bhp IC engine</td>
<td>$479.00</td>
</tr>
</tbody>
</table>
Appendixes

A. Draft ATC
B. BACT Guideline and BACT Analysis
C. Emissions Data
D. HRA Summary and AAQA
E. QNEC Calculations
F. SSPE1 Calculations
G. Greenhouse Gas Emissions Calculations
AUTHORITY TO CONSTRUCT

PERMIT NO: C-3114-2-0

LEGAL OWNER OR OPERATOR: COMCAST CABLE COMMUNICATIONS INC
MAILING ADDRESS: 2441 N GROVE INDUSTRIAL DR
                  FRESNO, CA 93727

LOCATION: 2096 N GATEWAY
            FRESNO, CA 93727

EQUIPMENT DESCRIPTION:
755 BHP CUMMINS MODEL QSK15-G9 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING AN ELECTRICAL GENERATOR

CONDITIONS

1. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three
   minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {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 and 40 CFR 60 Subpart III]
5. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap
   (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. The stack height shall be 16 feet. [District Rule 4102]
7. {4257} This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved
   alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart III]
8. {4262} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and
   during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall
   not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart III]
9. {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District
    Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart III]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO
OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE.
Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the
approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all
Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this
Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with
all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services
C-3114-2-0 Feb 8 2011 [BPNM - BRAGA - Final Inspection NOT Required]
Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061
10. Emissions from this IC engine shall not exceed any of the following limits: 4.04 g-NOx/bhp-hr, 0.52 g-CO/bhp-hr, or 0.21 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart III]

11. Emissions from this IC engine shall not exceed 0.10 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR Part 60 Subpart III]

12. \{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]

13. \{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]

14. \{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]

15. \{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]

16. \{4263\} The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]

17. \{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: 7/10/2009  
Emergency Diesel IC Engine  

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Achieved in Practice or in the SIP</th>
<th>Technologically Feasible</th>
<th>Alternate Basic Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>Latest EPA Tier Certification level for applicable horsepower range</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NOX</td>
<td>Latest EPA Tier Certification level for applicable horsepower range</td>
<td>0.15 g/hp-hr or the Latest EPA Tier Certification level for applicable horsepower range, whichever is more stringent (ATCM)</td>
<td></td>
</tr>
<tr>
<td>PM10</td>
<td>Very low sulfur diesel fuel (15 ppmw sulfur or less)</td>
<td>Latest EPA Tier Certification level for applicable horsepower range</td>
<td></td>
</tr>
<tr>
<td>SOX</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

1. BACT Analysis for NOx, VOC, and PM10 Emissions:

   a. Step 1 - Identify all control technologies

   The SJVUAPCD BACT Clearinghouse guideline 3.1.1 identifies achieved in practice
   BACT for emissions from emergency diesel IC engines as follows:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Achieved in Practice</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx and VOC</td>
<td>Latest EPA Tier Certification level for applicable horsepower range</td>
</tr>
<tr>
<td>PM10</td>
<td>0.15 g/hp-hr or the Latest EPA Tier Certification level for applicable horsepower range, whichever is more stringent. (ATCM)</td>
</tr>
</tbody>
</table>

   No technologically feasible alternatives or control alternatives identified as alternate
   basic equipment for this class and category of source are listed.

   b. Step 2 - Eliminate technologically infeasible options

   There are no technologically infeasible options to eliminate from Step 1.

   c. Step 3 - Rank remaining options by control effectiveness

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

   d. Step 4 - Cost Effectiveness Analysis

   The applicant has proposed the only control option listed for each pollutant. Therefore,
   a cost effectiveness analysis is not required.

   e. Step 5 - Select BACT

   BACT for NOx and VOC emissions from this emergency standby diesel IC engine is the
   latest EPA Tier Certification level for the applicable horsepower range. The applicant
   has proposed to install a Tier 2 certified 755 bhp emergency standby diesel IC engine,
   which is the latest Tier Certification for an engine this size as shown in the attached Tier
   Certification table at the end of this Appendix.

   BACT for PM10 is 0.15 g/hp-hr, or the latest EPA Tier Certification level for the
   applicable horsepower range, whichever is more stringent. The applicant is proposing
   an engine that meets this requirement. Therefore, BACT is satisfied for these pollutants.
<table>
<thead>
<tr>
<th>Power Rating (hp)</th>
<th>Tier</th>
<th>Model Year</th>
<th>NOx</th>
<th>HC</th>
<th>NMHC +NOx</th>
<th>CO</th>
<th>PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>50 ≤ hp &lt; 75</td>
<td>1</td>
<td>1998 – 2003</td>
<td>6.9</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>2004 - 2007</td>
<td>-</td>
<td>-</td>
<td>5.6</td>
<td>3.7</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>2008 - 2011</td>
<td>-</td>
<td>-</td>
<td>3.5</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>4*</td>
<td>2008 – 2012</td>
<td>3.5</td>
<td>3.7</td>
<td>3.7</td>
<td>0.22</td>
<td></td>
</tr>
</tbody>
</table>

| 75 ≤ hp < 100    | 1    | 1998 – 2003 | 6.9  | -  | -         | -   | -   |
|                  | 2    | 2004 – 2007 | -    | -  | 5.6       | 3.7 | 0.3 |
|                  | 3    | 2008 – 2011 | -    | -  | 3.5       | -   | -   |

| 100 ≤ hp < 175   | 1    | 1997 – 2002 | 6.9  | -  | -         | -   | -   |
|                  | 2    | 2003 – 2006 | -    | -  | 4.9       | 3.7 | 0.22|
|                  | 3    | 2007 – 2011 | -    | -  | 3.0       | -   | -   |

| 175 ≤ hp < 300   | 1    | 1996 – 2002 | 6.9  | 1.0| -         | 8.5 | 0.4 |
|                  | 2    | 2003 – 2005 | -    | -  | 4.9       | 2.6 | 0.15|
|                  | 3    | 2006 - 2010 | -    | -  | 3.0       | -   | -   |

| 300 ≤ hp < 600   | 1    | 1996 – 2000 | 6.9  | 1.0| -         | 8.5 | 0.4 |
|                  | 2    | 2001 – 2005 | -    | -  | 4.8       | 2.6 | 0.15|
|                  | 3    | 2006 – 2010 | -    | -  | 3.0       | -   | -   |

| 600 ≤ hp ≤ 750   | 1    | 1996 – 2001 | 6.9  | 1.0| -         | 8.5 | 0.4 |
|                  | 2    | 2002 – 2005 | -    | -  | 4.8       | 2.6 | 0.15|
|                  | 3    | 2006 – 2010 | -    | -  | 3.0       | -   | -   |

| > 750            | 1    | 2000 – 2005 | 6.9  | 1.0| -         | 8.5 | 0.4 |
|                  | 2    | 2006 – 2010 | -    | -  | 4.8       | 2.6 | 0.15|

* Manufacturers may optionally certify engine families to the interim Tier 4 for this power category through 2012.
Appendix C

Emissions Data Sheet
Pursuant to the authority vested in the Air Resources Board by Sections 43013, 43018, 43101, 43102, 43104 and 43105 of the Health and Safety Code; and

Pursuant to the authority vested in the undersigned by Sections 39515 and 39516 of the Health and Safety Code and Executive Order G-02-003;

IT IS ORDERED AND RESOLVED: That the following compression-ignition engines and emission control systems produced by the manufacturer are certified as described below for use in off-road equipment. Production engines shall be in all material respects the same as those for which certification is granted.

<table>
<thead>
<tr>
<th>MODEL YEAR</th>
<th>ENGINE FAMILY</th>
<th>DISPLACEMENT (liters)</th>
<th>FUEL TYPE</th>
<th>USEFUL LIFE (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>ACEXL015.AAJ</td>
<td>15.0</td>
<td>Diesel</td>
<td>8000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SPECIAL FEATURES &amp; EMISSION CONTROL SYSTEMS</th>
<th>TYPICAL EQUIPMENT APPLICATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Diesel Injection, Turbocharger, Charge Air Cooler, Engine Control Module</td>
<td>Generator Set</td>
</tr>
</tbody>
</table>

The engine models and codes are attached.

The following are the exhaust certification standards (STD), or family emission limit(s) (FEL) as applicable, and certification levels (CERT) for hydrocarbon (HC), oxides of nitrogen (NOx), or non-methane hydrocarbon plus oxides of nitrogen (NMHC+NOx), carbon monoxide (CO), and particulate matter (PM) in grams per kilowatt-hour (g/kw-hr), and the opacity-of-smoke certification standards and certification levels in percent (%) during acceleration (Accel), lugging (Lug), and the peak value from either mode (Peak) for this engine family (Title 13, California Code of Regulations, (13 CCR) Section 2423):

<table>
<thead>
<tr>
<th>RATED POWER CLASS</th>
<th>EMISSION STANDARD CATEGORY</th>
<th>EXHAUST (g/kw-hr)</th>
<th>OPACITY (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>kW &gt; 560</td>
<td>Tier 2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>STD</td>
<td></td>
<td>HC</td>
<td>NOx</td>
</tr>
<tr>
<td>FEL</td>
<td></td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>CERT</td>
<td></td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

BE IT FURTHER RESOLVED: That the family emission limit(s) (FEL) is an emission level declared by the manufacturer for use in any averaging, banking and trading program and in lieu of an emission standard for certification. It serves as the applicable emission standard for determining compliance of any engine within this engine family under 13 CCR Sections 2423 and 2427.

BE IT FURTHER RESOLVED: That for the listed engine models, the manufacturer has submitted the information and materials to demonstrate certification compliance with 13 CCR Section 2424 (emission control labels), and 13 CCR Sections 2425 and 2426 (emission control system warranty).

Engines certified under this Executive Order must conform to all applicable California emission regulations.

This Executive Order is only granted to the engine family and model-year listed above. Engines in this family that are produced for any other model-year are not covered by this Executive Order.

Executed at El Monte, California on this 13th day of August 2009.

[Signature]
Annette Hebert, Chief
Mobile Source Operations Division
Appendix D

HRA Summary and AAQA
San Joaquin Valley Air Pollution Control District
Risk Management Review

To: Gурpreet Brar – Permit Services
From: Cheryl Lawler – Technical Services
Date: February 1, 2011
Facility Name: Comcast Cable Communications, Inc.
Location: 2096 N. Gateway Drive, Fresno
Application #(s): C-3114-2-0
Project #: C-1103848

A. RMR SUMMARY

<table>
<thead>
<tr>
<th>Categories</th>
<th>Emergency Diesel ICE (Unit 2-0)</th>
<th>Project Totals</th>
<th>Facility Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prioritization Score</td>
<td>N/A</td>
<td>&gt;1</td>
<td>&gt;1</td>
</tr>
<tr>
<td>Acute Hazard Index</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Chronic Hazard Index</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Maximum Individual Cancer Risk</td>
<td>9.4E-07</td>
<td>9.4E-07</td>
<td>9.4E-07</td>
</tr>
<tr>
<td>T-BACT Required?</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Special Permit Conditions?</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1 Prioritization for this unit was not conducted since it has been determined that all diesel-fired IC engines will result in prioritization scores greater than 1.0.
2 Acute and Chronic Hazard Indices were not calculated since there is no risk factor or the risk factor is so low that it has been determined to be insignificant for these types of units.

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Unit # 2-0

1. Modified {1901} The PM10 emissions rate shall not exceed 0.1 g/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rule 2201]
2. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] N
3. Modified {1344} The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per year. [District NSR Rule and District Rule 4701] N
4. The stack height shall be 16 feet.
B. RMR REPORT

I. Project Description

Technical Services received a request on January 18, 2011, to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for a 755 bhp emergency diesel IC engine.

II. Analysis

Technical Services performed a screening level health risk assessment using the District's Diesel Exhaust Risk Screening spreadsheet.

The following parameters were used for the review:

<table>
<thead>
<tr>
<th>Analysis Parameters</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit #</td>
</tr>
<tr>
<td>-------</td>
</tr>
<tr>
<td>2-0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Location Type</th>
<th>Receptor Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban</td>
<td>Business</td>
</tr>
</tbody>
</table>

Technical Services also performed modeling for criteria pollutants CO, NO$_x$, SO$_x$, and PM$_{10}$ as well as the RMR. Emission rates used for criteria pollutant modeling for the engine were 0.87 lb/hr CO, 6.73 lb/hr NO$_x$, 0.01 lb/hr SO$_x$, and 0.16 lb/hr PM$_{10}$.

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*

Values are in µg/m$^3$

<table>
<thead>
<tr>
<th>Diesel ICE</th>
<th>1 Hour</th>
<th>3 Hours</th>
<th>8 Hours</th>
<th>24 Hours</th>
<th>Annual</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>Pass</td>
<td>X</td>
<td>Pass</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>NO$_x$</td>
<td>Pass$^1$</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>Pass</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>Pass</td>
<td>Pass</td>
<td>X</td>
<td>Pass</td>
<td>Pass</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>Pass$^1$</td>
<td>Pass$^1$</td>
</tr>
</tbody>
</table>

*Results were taken from the attached PSD spreadsheets.

$^1$The criteria pollutants are below EPA’s level of significance as found in 40 CFR Part 51.165 (b)(2).

$^2$The project was compared to the 1-hour NO2 National Ambient Air Quality Standard that became effective on April 12, 2010, using the District’s approved procedures. The Ozone Limiting Method (OLM) was used in accordance with the District’s Assessment of Non-Regulatory Options in AERMOD – Specifically OLM. A completed AERMOD Non-Regulatory Option checklist is attached.

III. Conclusions

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

The cancer risk associated with the operation of the proposed emergency diesel IC engine is 9.4E-07, which is less than the 1 in a million threshold. In accordance with the District’s Risk Management Policy, the engine is approved without Toxic Best Available Control Technology (T-BACT).
To ensure that human health risks will not exceed District allowable levels, the permit conditions listed on Page 1 of this report must be included for the 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.
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:

\[ \text{QNEC} = \text{PE2} - \text{PE1} \]

where:

\[ \begin{align*}
\text{QNEC} &= \text{Quarterly Net Emissions Change for each emissions unit, lb/qtr} \\
\text{PE2} &= \text{Post-Project Potential to Emit for each emissions unit, lb/qtr} \\
\text{PE1} &= \text{Pre-Project Potential to Emit for each emissions unit, lb/qtr}
\end{align*} \]

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:

\[ \text{PE2}_{\text{quarterly}} = \frac{\text{PE2 (lb/yr)}}{4 \text{ quarters/year}} = \text{QNEC} \]

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PE2 Total (lb/yr)</th>
<th>Quarterly PE2 (lb/qtr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{X}</td>
<td>336</td>
<td>84.0</td>
</tr>
<tr>
<td>SO\textsubscript{X}</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>8</td>
<td>2.0</td>
</tr>
<tr>
<td>CO</td>
<td>43</td>
<td>10.8</td>
</tr>
<tr>
<td>VOC</td>
<td>17</td>
<td>4.3</td>
</tr>
</tbody>
</table>
Appendix F

SSPE1 Calculations
The daily and annual PE for an existing permit unit C-3114-1-0 at the facility is calculated in the table given below:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emissions Factor (g/bhp-hr)</th>
<th>Rating (bhp)</th>
<th>Daily Hours of Operation (hrs/day)</th>
<th>Annual Hours of Operation (hrs/yr)</th>
<th>Daily PE2 (lb/day)</th>
<th>Annual PE2 (lb/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{x}</td>
<td>5.9</td>
<td>896</td>
<td>24</td>
<td>20</td>
<td>279.7</td>
<td>233</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
<td>0.0051</td>
<td>896</td>
<td>24</td>
<td>20</td>
<td>0.2</td>
<td>0</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>0.475</td>
<td>896</td>
<td>24</td>
<td>20</td>
<td>22.5</td>
<td>19</td>
</tr>
<tr>
<td>CO</td>
<td>3.04</td>
<td>896</td>
<td>24</td>
<td>20</td>
<td>144.1</td>
<td>120</td>
</tr>
<tr>
<td>VOC</td>
<td>1.14</td>
<td>896</td>
<td>24</td>
<td>20</td>
<td>54.0</td>
<td>45</td>
</tr>
</tbody>
</table>
Appendix G

Greenhouse Gas Emissions Calculations
Greenhouse Gas Emission Evaluation

The District has evaluated potential greenhouse gas emissions from the internal combustion engine rated at 755 brake horsepower to determine if there will be an increase in greenhouse gas emissions associated with this project.

Basis and Assumptions

- The engine is a compression-ignited unit fueled with diesel.
- The engine operates at full rated power.
- Specific fuel consumption is 220 g/kWh (typical for engine type).
- Density of diesel fuel is 7.0 lb/gallon.
- Higher Heating Value (HHV) of diesel is 138,700 Btu/gallon.
- Engine operates 50 hours per year
- Emission factors and global warming potentials (GWP) for diesel fuel are taken from the California Climate Change Action Registry (CCAR), Version 3.1, January, 2009 (Appendix C, Tables C.1, C.3 and C.6):
  
<table>
<thead>
<tr>
<th>Emission</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO₂</td>
<td>10.15 kg/gallon (22.3 lb/gallon)</td>
</tr>
<tr>
<td>CH₄</td>
<td>1.44 g/gallon (0.006 lb/gal)</td>
</tr>
<tr>
<td>N₂O</td>
<td>0.26 g/gallon (0.001 lb/gal)</td>
</tr>
</tbody>
</table>
  
  GWP for CH₄ = 23 lb-CO₂e per lb-CH₄
  GWP for N₂O = 296 lb-CO₂e per lb-N₂O

Calculations

**Diesel fuel consumption rate at full rated horsepower:**

\[
\frac{755 \text{ bhp}}{\text{hp}} \times \frac{0.7456 \text{ kW}}{\text{hp}} \times \frac{220 \text{ g}}{\text{kWh}} \times \frac{1 \text{ lb}}{453.6 \text{ g}} \times \frac{\text{gal}}{7 \text{ lb}} = 39 \text{ gal/hour}
\]

**Hourly Emissions**

- CO₂ Emissions = 39 gal/hr x 22.3 lb/gal = 869.7 lb-CO₂e/hour
- CH₄ Emissions = 39 gal/hr x 0.006 lb/gal x 23 lb-CO₂e per lb-CH₄ = 5.4 lb-CO₂e/hour
- N₂O Emissions = 39 gal/hr x 0.001 lb/gal x 296 lb-CO₂e per lb-N₂O = 11.5 lb-CO₂e/hour

Total = 869.7 + 5.4 + 11.5 = 886.6 lb-CO₂e/hour

**Annual Increase of Emissions**

886.6 lb-CO₂e/hour x 50 hr/year ÷ 2,000 lb/short ton = 22.2 short tons-CO₂e/year
22.2 short tons-CO₂e/year x 0.9072 metric tons/short ton = 20.1 metric tons/year

Per District Policy, project specific greenhouse gas emissions less than or equal to 230 metric tons-CO₂e/year are considered to be zero for District permitting purposes and are exempt from further environmental review.