

December 6, 2021

Mike Kalmink  
Will De Groot Dairy  
15417 Avenue 104  
Pixley, CA 93256

**Re: Notice of Preliminary Decision - Authority to Construct**  
**Facility Number: S-4846**  
**Project Number: S-1210524**

Dear Mr. Kalmink:

Enclosed for your review and comment is the District's analysis of Will De Groot Dairy's application for an Authority to Construct for installing a 787 bhp (intermittent) diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator, at 15417 Avenue 104, Pixley, California.

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

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Robert Rinaldi of Permit Services at (661) 392-5614.

Sincerely,



Brian Clements  
Director of Permit Services

BC:RCR

Enclosures

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

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Executive Director/Air Pollution Control Officer

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
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# San Joaquin Valley Air Pollution Control District

## Authority to Construct

### Application Review

Diesel-Fired Emergency Standby IC Engine

Facility Name:	Will De Groot Dairy	Date:	12/6/2021
Mailing Address:	15417 Avenue 104 Pixley, CA 93256	Engineer:	Robert Rinaldi
Contact Person:	Mike Kalmink	Lead Engineer:	Dan Klevann
Telephone:	(559) 587-2800		 12/6/21
E-mail:			
Application #:	S-4846-8-0		
Project #:	S-1210524		
Deemed Complete:	May 3, 2021		

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#### I. Proposal

Will De Groot Dairy is proposing to install a 787 bhp (intermittent) diesel-fired emergency standby internal combustion (IC) engine powering an electrical generator as a replacement for PTO S-4846-5.

#### II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (8/15/19)  
Rule 2410 Prevention of Significant Deterioration (6/16/11)  
Rule 2520 Federally Mandated Operating Permits (8/15/19)  
Rule 4001 New Source Performance Standards (4/14/99)  
Rule 4002 National Emission Standards for Hazardous Air Pollutants (5/20/04)  
Rule 4101 Visible Emissions (2/17/05)  
Rule 4102 Nuisance (12/17/92)  
Rule 4201 Particulate Matter Concentration (12/17/92)  
Rule 4701 Internal Combustion Engines - Phase 1 (8/21/03)  
Rule 4702 Internal Combustion Engines (8/19/21)  
Rule 4801 Sulfur Compounds (12/17/92)  
CH&SC 41700 Health Risk Assessment  
CH&SC 42301.6 School Notice  
Title 17 CCR, Section 93115 - Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines  
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)  
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

### **III. Project Location**

The equipment will be located at 15417 Avenue 104, Pixley, CA.

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

### **IV. Process Description**

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

### **V. Equipment Listing**

**S-4846-8-0:** 787 BHP (INTERMITTENT) PERKINS MODEL 2506C-E15TAG3  
TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC  
ENGINE POWERING AN ELECTRICAL GENERATOR

### **VI. Emission Control Technology Evaluation**

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

The District is aware that the availability of Tier 4 Final (Tier 4F) certified IC engines is improving, and that some Tier 4F IC engines are currently in use, in emergency standby applications. Consequently, the use of a Tier 4F certified IC engine must be considered as part of the District's BACT analysis for this project.

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

The use of CARB certified diesel fuel (0.0015% by weight sulfur maximum) reduces SO<sub>x</sub> emissions by over 99% from standard diesel fuel.

## VII. General Calculations

### A. Assumptions

Emergency operating schedule:	24 hours/day
Non-emergency operating schedule:	50 hours/year
Density of diesel fuel:	7.1 lb/gal
EPA F-factor (adjusted to 60 °F):	9,051 dscf/MMBtu
Fuel heating value:	137,000 Btu/gal
BHP to Btu/hr conversion:	2,542.5 Btu/bhp-hr
Thermal efficiency of engine:	commonly $\approx$ 35%
PM <sub>10</sub> fraction of diesel exhaust:	0.96 (CARB, 1988)
Conversion factor:	1.34 bhp/kw

### B. Emission Factors

Emission Factors			
Pollutant	Emission Factor (g/bhp-hr)	Emission Factor (g/kw-hr)	Source
NO <sub>x</sub>	4.00	--	Engine Manufacturer
SO <sub>x</sub>	0.0051	--	Mass Balance Equation Below
PM <sub>10</sub>	0.067	--	Engine Manufacturer
CO	1.19	--	Engine Manufacturer
VOC	0.067	--	Engine Manufacturer

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

**C. Calculations**

**1. Pre-Project Potential to Emit (PE1)**

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

**2. Post-Project Potential to Emit (PE2)**

The daily and annual PE2 are calculated as follows:

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

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

<b>Post Project Emissions (PE2)</b>						
<b>Pollutant</b>	<b>Emissions Factor (g/bhp-hr)</b>	<b>Rating (bhp)</b>	<b>Daily Hours of Operation (hrs/day)</b>	<b>Annual Hours of Operation (hrs/year)</b>	<b>Daily PE2 (lb/day)</b>	<b>Annual PE2 (lb/yr)</b>
NO <sub>x</sub>	4.00	787	24	50	<b>166.6</b>	<b>347</b>
SO <sub>x</sub>	0.0051	787	24	50	<b>0.2</b>	<b>0</b>
PM <sub>10</sub>	0.067	787	24	50	<b>2.8</b>	<b>6</b>
CO	1.19	787	24	50	<b>49.6</b>	<b>103</b>
VOC	0.067	787	24	50	<b>2.8</b>	<b>6</b>

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

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

SSPE1 is documented in the following table from the most recent project S-1111314 prior to this project:

<b>Stationary Source Potential to Emit [SSPE1] (lb/year)</b>					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-4846-1-2 through -4-2 & -7-1	0	0	48,610	0	117,705
S-4846-5-0	1,034	98	52	314	118
S-4846-6-0	0	0	0	0	59
<b>Stationary Source Potential to Emit</b>	<b>1,034</b>	<b>98</b>	<b>48,662</b>	<b>314</b>	<b>117,882</b>

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

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

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

<b>SSPE2 (lb/year)</b>					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE1	1,034	98	48,662	314	117,882
S-4846-8-0	347	0	6	103	6
<b>SSPE2</b>	<b>1,381</b>	<b>98</b>	<b>48,668</b>	<b>417</b>	<b>117,888</b>

## 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

Major Source determination is documented in the following table from the most recent project S-1111314 prior to this project:

<b>Major Source Determination (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
S-4846-1-2 through -4-2 & -7-1	0	0	0	0	5,205
S-4846-5-0	1,034	98	52	314	118
S-4846-6-0	0	0	0	0	59
S-4846-8-0	347	0	6	103	6
Stationary Source Potential to Emit	1,381	98	58	417	5,388
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No

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

### Rule 2410 Major Source Determination:

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

## **6. Baseline Emissions (BE)**

BE = Pre Project Potential to Emit for:

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

otherwise,

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

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

## **7. SB 288 Major Modification**

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

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

## **8. Federal Major Modification**

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

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

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

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



## **10. Quarterly Net Emissions Change (QNEC)**

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

## **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<sup>1</sup>:

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

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

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<sup>1</sup> 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.

<b>New Emissions Unit BACT Applicability</b>				
<b>Pollutant</b>	<b>Daily Emissions for the new unit (lb/day)</b>	<b>BACT Threshold (lb/day)</b>	<b>SSPE2 (lb/yr)</b>	<b>BACT Triggered?</b>
NO <sub>x</sub>	166.6	> 2.0	n/a	Yes
SO <sub>x</sub>	0.2	> 2.0	n/a	No
PM <sub>10</sub>	2.5	> 2.0	n/a	Yes
CO	49.6	> 2.0 and SSPE2 ≥ 200,000 lb/yr	417	No
VOC	2.8	> 2.0	n/a	Yes

As shown above, BACT will be triggered for NO<sub>x</sub>, PM<sub>10</sub>, and VOC emissions from the engine for this project.

## 2. BACT Guideline

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

## 3. Top Down BACT Analysis

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

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

- NO<sub>x</sub>: Latest Available Tier Certification level for applicable horsepower
- VOC: Latest Available Tier Certification level for applicable horsepower
- PM<sub>10</sub>: 0.15 g/bhp-hr

The facility has proposed to install a 787 bhp Tier 2 certified IC engine (with a PM<sub>10</sub> emissions rate of 0.067 g/bhp-hr), and using very low sulfur diesel fuel. Therefore, BACT is satisfied for NO<sub>x</sub>, PM<sub>10</sub>, and VOC.

## 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:

<b>Offset Determination (lb/year)</b>					
	<b>NOx</b>	<b>SOx</b>	<b>PM<sub>10</sub></b>	<b>CO</b>	<b>VOC</b>
SSPE2	1,381	98	48,668	417	117,888
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 shown in the table above, offsets are triggered for PM10 and VOC emissions since the PM10 and VOC SSPE2 exceeds the offset trigger threshold; however, as previously discussed, the offset exemption from Section 4.6.2 of District Rule 2201 is applicable to this project; therefore, offset calculations are not necessary and offsets are not required.

**C. Public Notification**

**1. Applicability**

Public noticing is required for:

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

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

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

As calculated in Section VII.C.2, daily emissions for NO<sub>x</sub> is 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?
NO <sub>x</sub>	1,034	1,381	20,000 lb/year	No
SO <sub>x</sub>	98	98	54,750 lb/year	No
PM <sub>10</sub>	48,662	48,668	29,200 lb/year	No
CO	314	417	200,000 lb/year	No
VOC	117,882	117,888	20,000 lb/year	No

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

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

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

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

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

## 2. Public Notice Action

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

## D. Daily Emissions Limits

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

- {4771} Emissions from this IC engine shall not exceed any of the following limits: 4.00 g-NOx/bhp-hr, 1.19 g-CO/bhp-hr, or 0.067 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]
- {4772} Emissions from this IC engine shall not exceed 0.067 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- {4258} Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115]

## **E. Compliance Assurance**

### **1. Source Testing**

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

### **2. Monitoring**

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

### **3. Recordkeeping**

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

### **4. Reporting**

No reporting is required to ensure compliance with District Rule 2201.

## **F. Ambient Air Quality Analysis (AAQA)**

An AAQA shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. The District's Technical Services Division conducted the required analysis. Refer to Appendix C of this document for the AAQA summary sheet.

The proposed location is in an attainment area for NO<sub>x</sub>, CO, and SO<sub>x</sub>. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for NO<sub>x</sub>, CO, or SO<sub>x</sub>.

The proposed location is in a non-attainment area for the state's PM<sub>10</sub> as well as federal and state PM<sub>2.5</sub> thresholds. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for PM<sub>10</sub> and PM<sub>2.5</sub>.

## **Rule 2410 Prevention of Significant Deterioration**

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

### **Rule 2520 Federally Mandated Operating Permits**

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

### **Rule 4001 New Source Performance Standards (NSPS)**

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

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

### **Rule 4002 National Emission Standards for Hazardous Air Pollutants**

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

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

### **Rule 4101 Visible Emissions**

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

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

**Rule 4102 Nuisance**

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

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

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

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

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (Appendix C), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

<b>RMR Summary</b>			
<b>Categories</b>	<b>Emergency IC Engine (Unit #-8)</b>	<b>Project Totals</b>	<b>Facility Totals</b>
<b>Prioritization Score</b>	<b>3.47</b>	3.47	<1
<b>Acute Hazard Index</b>	n/a	n/a	0.00
<b>Chronic Hazard Index</b>	0.00	0.00	0.00
<b>Maximum Individual Cancer Risk</b>	2.04E-08	2.04E-08	2.04E-08
<b>T-BACT Required?</b>	Yes		
<b>Special Permit Conditions?</b>	Yes		

**Discussion of T-BACT**

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



For this project T-BACT is triggered for PM<sub>10</sub>. T-BACT is satisfied with BACT (see Appendix C), which is:

PM<sub>10</sub>: 0.067 g/bhp-hr

Therefore, compliance with the District's Risk Management Policy is expected.

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

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

- {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- {4772} Emissions from this IC engine shall not exceed 0.067 g-PM<sub>10</sub>/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
- {4920} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201, 4102, and 4702, and 17 CCR 93115]

## Rule 4201 Particulate Matter Concentration

Rule 4201 limits particulate matter emissions from any single source operation to 0.1 g/dscf, which, as calculated below, is equivalent to a PM<sub>10</sub> emission factor of 0.4 g-PM<sub>10</sub>/bhp-hr.

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

The new engine has a PM<sub>10</sub> emission factor less than 0.4 g/bhp-hr. Therefore, compliance is expected and the following condition will be listed on the ATC as a mechanism to ensure compliance:

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

## Rule 4701 Internal Combustion Engines - Phase 1

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. Except as provided in Section 4.0, the provisions of this rule apply to any internal combustion engine, rated greater than 50 bhp, that requires a PTO.

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

## Rule 4702 Internal Combustion Engines

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

*3.15 Emergency Standby Engine: an internal combustion engine which operates as a temporary replacement for primary mechanical or electrical power during an unscheduled outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the operator. An engine shall be considered to be an emergency standby engine if it is used only for the following purposes: (1) periodic maintenance, periodic readiness testing, or readiness testing during and after repair work; (2) unscheduled outages, or to supply power while maintenance is performed or repairs are made to the primary power supply; and (3) if it is limited to operate 100 hours or less per calendar year for non-*

*emergency purposes. An engine shall not be considered to be an emergency standby engine if it is used: (1) to reduce the demand for electrical power when normal electrical power line service has not failed, or (2) to produce power for the utility electrical distribution system, or (3) in conjunction with a voluntary utility demand reduction program or interruptible power contract.*

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

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

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

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

- {4920} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201, 4102, and 4702, and 17 CCR 93115]

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

*4.2 Except for the requirements of Section 5.9 and Section 6.2.3, the requirements of this rule shall not apply to:  
4.2.1 An emergency standby engine as defined in Section 3.0 of this rule, and provided that it is operated with a nonresettable elapsed operating time meter.*

*In lieu of a nonresettable time meter, the owner of an emergency engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.*

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

Section 5.9 requires the owner to:

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

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

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

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

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

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

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

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

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

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

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

*6.2.3.1 Total hours of operation,*

*6.2.3.2 The type of fuel used,*

*6.2.3.3 The purpose for operating the engine,*

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

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

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

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

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

### Rule 4801 Sulfur Compounds

Rule 4801 requires that sulfur compound emissions (as SO<sub>2</sub>) shall not exceed 0.2% by volume. Using the ideal gas equation, the sulfur compound emissions are calculated as follows:

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

n = moles SO<sub>2</sub>

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

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

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

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

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

### California Health & Safety Code 42301.6 (School Notice)

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

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

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

<p><b>Title 17 CCR Section 93115 Requirements for New Emergency IC Engines Powering Electrical Generators</b></p>	<p><b>Proposed Method of Compliance with Title 17 CCR Section 93115 Requirements</b></p>
<p>Emergency engine(s) must be fired on CARB diesel fuel, or an approved alternative diesel fuel.</p>	<p>The applicant has proposed the use of CARB certified diesel fuel. The proposed permit condition, requiring the use of CARB certified diesel fuel, is included on the permit.</p> <ul style="list-style-type: none"> <li>• {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]</li> </ul>
<p>The engine(s) must meet the emission standards in Table 1 of the ATCM for the specific power rating and model year of the proposed engine.</p>	<p>The applicant has proposed the use of an engine that is certified to the latest EPA Tier Certification standards for the applicable horsepower range, guaranteeing compliance with the emission standards of the ATCM. Additionally, the proposed diesel PM emissions rate is less than or equal to 0.15 g/bhp-hr.</p>
<p>The engine may not be operated more than 50 hours per year for maintenance and testing purposes unless the PM emissions are <math>\leq</math> 0.01 g/bhp-hr, then the engine is allowed 100 hours per year. Emissions from this engine are certified at 0.10 g/bhp-hr, therefore the engine is allowed 50 hours.</p>	<p>The following conditions will be included on the permit:</p> <ul style="list-style-type: none"> <li>• {4772} 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, and 17 CCR 93115]</li> <li>• {4920} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201, 4102, and 4702, and 17 CCR 93115]</li> </ul>
<p>Engines, with a PM10 emissions rate greater than 0.01 g/bhp-hr and located at schools, may not be operated for maintenance and testing whenever there is a school sponsored activity on the grounds. Additionally, engines located within 500 feet of school grounds may not be operated for maintenance and testing between 7:30 AM and 3:30 PM</p>	<p>The District has verified that this engine is not located within 500' of a school.</p>

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



## **California Environmental Quality Act (CEQA)**

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

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

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

## **Indemnification Agreement/Letter of Credit Determination**

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

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

**IX. Recommendation**

Pending a successful NSR public noticing period, issue Authority to Construct S-4846-8-0 subject to the permit conditions on the attached draft ATC in Appendix A.

**X. Billing Information**

<b>Billing Schedule</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Fee Amount</b>
S-4868-8-0	3020-10-D	787 bhp IC engine	\$577

**Appendixes**

- A. Draft ATC
- B. BACT Guideline and BACT Analysis
- C. RMR and AAQA
- D. QNEC Calculations
- E. BACT Letter from Reddy Power Services

Appendix A  
Draft ATC

*San Joaquin Valley  
Air Pollution Control District*

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** S-4846-8-0

**LEGAL OWNER OR OPERATOR:** WILL DE GROOT DAIRY

**MAILING ADDRESS:** 15417 AVENUE 104  
PIXLEY, CA 93256

**LOCATION:** 15417 AVENUE 104  
PIXLEY, CA 93256

**EQUIPMENT DESCRIPTION:**

787 BHP (INTERMITTENT) PERKINS MODEL 2506C-E15TAG3 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

## CONDITIONS

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1. Upon implementation of ATC S-4846-8-0, PTO S-4846-5 shall be canceled and taken out of service. [District Rule 2201]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. {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]
4. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
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. {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]
7. {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]
8. Emissions from this IC engine shall not exceed any of the following limits: 4.00 g-NOx/bhp-hr, 1.19 g-CO/bhp-hr, or 0.067 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

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Brian Clements, Director of Permit Services

S-4846-8-0 : Dec 6 2021 10:38AM -- RINALDIR : Joint Inspection NOT Required

9. Emissions from this IC engine shall not exceed 0.067 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, and 17 CCR 93115]
10. {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]
11. {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]
12. {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]
13. {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]
14. {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]
15. {4920} This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201, 4102, and 4702, and 17 CCR 93115]
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]

DRAFT

Appendix B  
BACT Guideline and BACT Analysis

# San Joaquin Valley Unified Air Pollution Control District

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

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

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

## Top Down BACT Analysis for the Emergency IC Engine

This application was deemed complete on 5/3/2021. 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 NO<sub>x</sub>, PM<sub>10</sub>, 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*

#### b. Step 2 - Eliminate technologically infeasible options

The applicant has proposed to install a Tier 2 certified diesel-fired IC engine that is fired on very low-sulfur diesel fuel and a PM<sub>10</sub> emission factor of 0.067 g/bhp-hr, which is less than the BACT limit of 0.15 g/bhp-hr.

The District is aware that the availability of Tier 4 Final (Tier 4F) certified IC engines is improving, and that some Tier 4F IC engines are currently in use, in emergency standby applications. Consequently, the use of a Tier 4F certified IC engine must be considered as part of the District's BACT analysis for this project.

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

#### c. Step 3 - Rank remaining options by control effectiveness

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

#### d. Step 4 - Cost Effectiveness Analysis

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



**e. Step 5 - Select BACT**

BACT for NOX, PM10, and VOC will be the use of an EPA Tier 2 certified engine and a PM10 emission factor of 0.067 g/bhp-hr. The applicant is proposing such a unit. Therefore, BACT will be satisfied.

Appendix C  
RMR and AAQA Memo

# San Joaquin Valley Air Pollution Control District

## Risk Management Review and Ambient Air Quality Analysis

To: Robert C Rinaldi – Permit Services  
 From: Michael Scott – Technical Services  
 Date: November 12, 2021  
 Facility Name: WILL DE GROOT DAIRY  
 Location: 15417 AVENUE 104, PIXLEY  
 Application #(s): S-4846-8-0  
 Project #: S-1210524

### 1. Summary

#### 1.1 RMR

Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required	Special Permit Requirements
8-0	3.47	NA <sup>1</sup>	0.00	2.04E-08	Yes	Yes
<b>Project Totals</b>	3.47	NA <sup>1</sup>	0.00	2.04E-08		
<b>Facility Totals</b>	<1	0.00	0.00	2.04E-08		

Notes:

- Acute Hazard Index was not calculated for Unit 8 since there is no risk factor or the risk factor is so low that it has been determined to be insignificant for this type of unit.

#### 1.2 AAQA

Pollutant	Air Quality Standard (State/Federal)				
	1 Hour	3 Hours	8 Hours	24 Hours	Annual
<b>CO</b>	NA <sup>2</sup>		NA <sup>2</sup>		
<b>NO<sub>x</sub></b>	NA <sup>2</sup>				Pass
<b>SO<sub>x</sub></b>	NA <sup>2</sup>	NA <sup>2</sup>		NA <sup>2</sup>	Pass
<b>PM10</b>				NA <sup>2</sup>	Pass
<b>PM2.5</b>				NA <sup>2</sup>	Pass

Notes:

- Results were taken from the attached AAQA Report.
- The project is an intermittent source as defined in APR-1920. In accordance with APR-1920, compliance with short-term (i.e., 1-hour, 3-hour, 8-hour and 24-hour) standards is not required.
- The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2) unless otherwise noted below.
- Modeled PM10 concentrations were below the District SIL for non-fugitive sources of 5 µg/m<sup>3</sup> for the 24-hour average concentration and 1 µg/m<sup>3</sup> for the annual concentration.
- Modeled PM2.5 concentrations were below the District SIL for non-fugitive sources of 1.2 µg/m<sup>3</sup> for the 24-hour average concentration and 0.2 µg/m<sup>3</sup> for the annual concentration.

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

### Unit # 8

1. The PM<sub>10</sub> emissions rate shall not exceed 0.067 g/bhp-hr based on US EPA certification using ISO 8178 test procedure.
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction.
3. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year.

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

## **2. Project Description**

Technical Services received a request on November 9, 2021 to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for the following:

- Unit-8-0: 787 BHP (INTERMITTENT) PERKINS MODEL 2506C-E15TAG3 TIER 2 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

## **3. RMR Report**

### **3.1 Analysis**

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

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

Then, generally no further analysis is required.

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

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

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

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

These emissions were input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy, risks from the proposed unit's toxic emissions were prioritized using the procedure in the 2016 CAPCOA Facility Prioritization Guidelines. The prioritization score for this proposed facility was greater than 1.0 (see RMR Summary Table). Therefore, a refined health risk assessment was required.

The AERMOD model was used, with the parameters outlined below and meteorological data for 2007-2011 from Tipton (rural dispersion coefficient selected) to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the SHARP Program, which then used the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Source Process Rates					
Unit ID	Process ID	Process Material	Process Units	Hourly Process Rate	Annual Process Rate
8	1	PM10	LBS	0.12	6

Point Source Parameters						
Unit ID	Unit Description	Release Height (m)	Temp. (°K)	Exit Velocity (m/sec)	Stack Diameter (m)	Vertical/Horizontal/Capped
8	787 bhp DICE	3.11	823	847.23	0.15	Vertical

#### 4. AAQA Report

The District modeled the impact of the proposed project on the National Ambient Air Quality Standard (NAAQS) and/or California Ambient Air Quality Standard (CAAQS) in accordance with District Policy APR-1925 (Policy for District Rule 2201 AAQA Modeling) and EPA's Guideline for Air Quality Modeling (Appendix W of 40 CFR Part 51). The District uses a progressive three level approach to perform AAQAs. The first level (Level 1) uses a very conservative approach. If this analysis indicates a likely exceedance of an AAQS or Significant Impact Level (SIL), the analysis proceeds to the second level (Level 2) which implements a more refined approach. For the 1-hour NO<sub>2</sub> 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	Visalia - N. Church	Tulare	Visalia	2018
PM10	ASH MOUNTIAN, SEQUOIA NATIONAL PARK	Tulare	Sequoia National Park	2018
PM2.5	Visalia - N. Church	Tulare	Visalia	2018
SOx	Fresno - Garland	Fresno	Fresno	2018

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

Emission Rates (lbs/year)						
Unit ID	Process	NOx	SOx	CO	PM10	PM2.5
8	1	347	0	103	6	6

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 Tipton (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
8	787 bhp DICE	3.11	823	847.23	0.15	Vertical

## 5. Conclusion

### 5.1 RMR

The cumulative acute and chronic indices for this facility, including this project, are below 1.0; and the cumulative cancer risk for this facility, including this project, is less than 20 in a million. However, the cancer risk for one or more units in this project is greater than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved with Toxic Best Available Control Technology (T-BACT).**

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

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

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 D

## QNEC Calculations



### Quarterly Net Emissions Change (QNEC)

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

QNEC = PE2 - PE1, where:

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

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

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

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

QNEC		
Pollutant	PE2 Total (lb/yr)	Quarterly PE2 (lb/qtr)
NO <sub>x</sub>	347	86.8
SO <sub>x</sub>	0	0.0
PM <sub>10</sub>	6	1.5
CO	103	25.8
VOC	6	1.5

Appendix E  
BACT Letter from Reddy Power Services

SJVAPCD,

Reddy Power Services has been notified that BACT requires the latest Tier be installed which happens to be a Tier 4. We have submitted a Tier 2 engine because it is critical that a standby generator runs in emergency situations. Tier 2 engines are better suited for use standby emergency situations due to their simplicity, reliability, and overall effectiveness. Tier 4 engines require use many different combinations of aftertreatment components. More components and functions make the engine less reliable in times of emergency. Tier 4 units used only in emergency situations can create problems within the aftertreatment system that will cause engine failure. Engine failure in an emergency can cause loss of life. Tier 2 engines are less complicated and are proven to be clean and reliable. We have found engines used for emergency standby are only used on average, 15-35 hours a year, far less than they are permitted to run. Overall, Tier 4 units are better suited for constant use in prime power situations where there is a dedicated load, and long run times to properly clean the aftertreatment systems.

Kind regards,

Reddy Power Services