

DRAFT
Engineering Evaluation
Pacific Bell Telephone Company DBA AT&T California
Application # 16865
Plant # 13485

BACKGROUND

Pacific Bell Telephone Company DBA AT&T California has applied for an Authority to Construct (AC) and/or a Permit to Operate (PO) for the following equipment:

**S-2 Standby Diesel Generator Set, Engine Manufacturer: Caterpillar, Model C32 DI
ATAAC, Rated at 1502 Bhp, 7.34 MM Btu/hr input**

The generator set will be used to provide emergency power at 2388 Second St., Livermore in the event of a blackout.

EMISSIONS CALCULATIONS

Annual Average Emissions:

- Basis:
- 1502 bhp output rating for full-load, standby operation
 - 50 hr/yr operation for testing and maintenance
 - NO_x, VOC, CO and PM₁₀ emission factors from CARB certification data (Executive Order U-R-001-0314):

NO_x: 5.4 g/hp-hr
POC: 0.3 g/hp-hr
CO: 1.6 g/hp-hr
PM₁₀: 0.13 g/hp-hr

- SO₂ emission factor is from EPA AP-42, Table 3.4-1 ("Large Stationary Diesel and Dual-Fuel Engines"), which is based on full conversion of fuel sulfur to SO₂ and which will therefore be considered applicable to any diesel engine (sulfur content will be assumed to be the California limit of 0.05 wt% sulfur):

SO₂: 8.09E-3(0.05) lb/hp-hr (454 g/lb) = 0.18 g/hp-hr

NO_x: (50 hr/yr)(1502 hp)(5.4 g/hp-hr)(lb/454 g)/(365 day/yr) = 2.45 lb/day

POC: (50 hr/yr)(1502 hp)(0.3 g/hp-hr)(lb/454 g)/(365 day/yr) = 0.14 lb/day

CO: (50 hr/yr)(1502 hp)(1.6 g/hp-hr)(lb/454 g)/(365 day/yr) = 0.73 lb/day

PM₁₀: (50 hr/yr)(1502 hp)(0.13 g/hp-hr)(lb/454 g)/(365 day/yr) = 0.06 lb/day

SO₂: (50 hr/yr)(1502 hp)(0.18 g/hp-hr)(lb/454 g)/(365 day/yr) = 0.08 lb/day

Daily Emissions:

Daily emissions are calculated to establish whether a source triggers the requirement for BACT (10 lb/highest day total source emissions for any class of pollutants). 24-hr/day operation will be assumed.

NO_x: (24 hr/day)(1502 hp)(5.4 g/hp-hr)(lb/454 g) = **428.8 lb/day**

POC: (24 hr/day)(1502 hp)(0.3 g/hp-hr)(lb/454 g) = **23.8 lb/day**

CO: (24 hr/day)(1502 hp)(1.6 g/hp-hr)(lb/454 g) = **127.0 lb/day**

PM₁₀: (24 hr/day)(1502 hp)(0.13 g/hp-hr)(lb/454 g) = **10.3 lb/day**

SO₂: (24 hr/day)(1502 hp)(0.18 g/hp-hr)(lb/454 g) = **14.3 lb/day**

PLANT CUMULATIVE EMISSIONS

Emissions for S-2

	current (ton/yr)	proposed (ton/yr)	new total (ton/yr)
NO _x :	0	0.447	0.447
POC:	0	0.026	0.026
CO:	0	0.133	0.133
PM ₁₀ :	0	0.011	0.011
SO ₂ :	0	0.015	0.015

TOXICS RISK SCREENING ANALYSIS

A Toxics Risk Screening Analysis was required for diesel engine exhaust. A risk screening analysis was performed for estimated emissions from 50 hours of operation per year. The maximum cancer risk was estimated at 7.8 in a million. In accordance with the District's Regulation 2-5, this risk level is considered acceptable as the engine meets current TBACT requirements.

STATEMENT OF COMPLIANCE

S-2 will be operated as an emergency standby engine and, therefore, is not subject to the emission rate limits in Regulation 9, Rule 8 (NO_x and CO from Stationary Internal Combustion Engines). S-2 is subject to the monitoring and record keeping requirements of Regulation 9-8-530 and the SO₂ limitations of Reg. 9-1-301 (ground level concentration) and Reg. 9-1-304 (0.5% by weight in fuel). Regulation 9-8-530 requirements are incorporated into the proposed permit conditions. Compliance with Regulation 9-1 is expected since diesel fuel with a 0.05% by weight sulfur is mandated for use in California. Like all sources, S-2 is subject to Regulation 6 (Particulate and Visible Emissions). This engine is not expected to produce visible emissions or fallout in violation of this regulation and is assumed to be in compliance with Regulation 6 pending regular inspection.

The project is considered to be ministerial under District's CEQA Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors (MOP Chapter 2.3) and therefore is not discretionary as defined by CEQA.

OFFSETS

Offset credits must be provided for any new or modified source of POC or NO_x emissions at facilities that emit more than 10 tons per year of these pollutants. The District may provide offsets for facilities with POC or NO_x emissions between 10 and 35 tons per year as long as the facility has no available offset credits and all existing sources of POC and/or NO_x are equipped with Best Available Retrofit Control Technology (BARCT). Total facility emissions, including this project, will be less than 10 tons per year of POC or NO_x. Therefore, offsets are not required.

BACT

In accordance with Regulation 2, Rule 2, Section 301, BACT is triggered for any new or modified source with the potential to emit 10 pounds per highest day of POC, NO_x, CO, SO₂, or PM₁₀. Based on the above emission calculations, the owner/operator of S-2 is subject to BACT for POC, NO_x, CO, SO₂, and PM₁₀ emissions. BACT for this source is presented in the current BAAQMD BACT/TBACT Workbook for this source category as shown below:

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guideline**

Source Category

Source:	<i>IC Engine - Compression Ignition</i>	Revision:	<i>5</i>
		Document #:	<i>96.1.2</i>
Class:	<i>> or = 175 horsepower output rating</i>	Date:	<i>01/11/02</i>

Determination

POLLUTANT	BACT 1. Technologically Feasible/ Cost Effective 2. Achieved in Practice 3. TBACT	TYPICAL TECHNOLOGY
POC	1. <i>0.30 g/bhp-hr [62 ppmvd @ 15% O₂]^{a,b}</i> 2. <i>1.5 g/bhp-hr [309 ppmvd @ 15% O₂]^{b,c}</i>	1. <i>Catalytic Oxidation and CARB or EPA (or equivalent) low-total hydrocarbon emitting certified engine^{a,b}</i> 2. <i>CARB or EPA (or equivalent) low-total hydrocarbon emitting certified engine^{b,c}</i>
NO _x	1. <i>1.5 g/bhp-hr [107 ppmvd @ 15% O₂]^{a,b}</i> 2. <i>6.9 g/bhp-hr [490 ppmvd @ 15% O₂]^{a,b,c}</i> 3. <i>6.9 g/bhp-hr [490 ppmvd @ 15% O₂]²</i>	1. <i>Selective Catalytic Reduction (SCR) + Timing Retard + Turbocharger w/ Intercooler^{a,b}</i> 2. <i>Timing Retard ≤ 4° + Turbocharger w/ Intercooler^{a,b,c}</i> 3. <i>Timing Retard ≤ 4° + Turbocharger w/ Intercooler</i>
SO ₂	1. <i>n/d</i> 2. <i>fuel oil < 0.05% sulfur^{a,b}</i>	1. <i>n/d</i> 2. <i>Fuel Selection^{a,b}</i>
CO	1. <i>n/s</i> 2. <i>2.75 g/bhp-hr [319 ppmvd @ 15% O₂]^{b,c}</i>	1. <i>Catalytic Oxidation^b</i> 2. <i>CARB or EPA (or equivalent) low-CO emitting certified engine^{b,c}</i>
PM ₁₀	1. <i>n/d</i> 2. <i>If practical, gas-fueled engine or electric motor. If not, "California Diesel Fuel" (fuel oil w/ < 0.05% by weight sulfur and < 20% by volume aromatic)</i>	1. <i>Catalyst Guard Bed^{a,b}</i> 2. <i>Fuel Selection^{b,d}</i> 3. <i>CARB or EPA (or equivalent) low-</i>

	hydrocarbons) ^b 3. 0.1 grams/bhp-hr	particulate matter emitting certified engine, or particulate filter
NPOC	1. n/a 2. n/a	1. n/a 2. n/a

References

- a. CARB/CAPCOA Clearinghouse
- b. BAAQMD NOTE: IC Engine BACT and TBACT is a low emitting, spark-ignited, gas-fueled engine with lean burn combustion or rich burn with non-selective catalytic reduction, or electric motor. A diesel engine will be permitted only if a gas-fueled engine, or electric motor, is not practical (e.g., a remote location without natural gas availability or electric power, or only a diesel engine will meet the portability and/or power/torque/rpm requirements of the application under review, or the engine is used exclusively for emergency use during involuntary loss of power).
- c. Timing retard, etc. controls alone may be acceptable only in very limited situations for temporary sources.

The more restrictive BACT 1 levels do not apply for engines used exclusively for emergency use during involuntary loss of power per the BACT workbook, document 96.1.2 of the BAAQMD BACT Guidelines for IC engines. The engine will meet BACT 2 limits.

This source is within 1,000 feet of a K-12 school and therefore triggers the public notice provisions of Regulation 2-1-412.

PSD, NSPS, NESHAPs do not apply to this application.

PERMIT CONDITIONS

Conditions for S-2, Emergency Diesel Generator Set
Application #16865, Plant #13485

COND# 22850

1. The owner/operator shall not exceed 50 hours per year per engine for reliability-related testing.
[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(2)(A)(3) or (e)(2)(B)(3)]
2. The owner/operator shall operate each emergency standby engine only for the following purposes: to mitigate emergency conditions, for emission testing to demonstrate compliance with a District, State or Federal emission limit, or for reliability-related activities (maintenance and other testing, but excluding emission testing). Operating while mitigating emergency conditions or while emission testing to show compliance with District, State or Federal emission limits is not limited.
[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection

(e)(2)(A)(3) or (e)(2)(B)(3)]

3. The owner/operator shall operate each emergency standby engine only when a non-resettable totalizing meter (with a minimum display capability of 9,999 hours) that measures the hours of operation for the engine is installed, operated and properly maintained.

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection(e)(4)(G)(1)]

4. Records: The owner/operator shall maintain the following monthly records in a District-approved log for at least 36 months from the date of entry (60 months if the facility has been issued a Title V Major Facility Review Permit or a Synthetic Minor Operating Permit). Log entries shall be retained on-site, either at a central location or at the engine's location, and made immediately available to the District staff upon request.
 - a. Hours of operation for reliability-related activities (maintenance and testing).
 - b. Hours of operation for emission testing to show compliance with emission limits.
 - c. Hours of operation (emergency).
 - d. For each emergency, the nature of the emergency condition.
 - e. Fuel usage for each engine(s).

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(4)(I), (or, Regulation 2-6-501)]

5. At School and Near-School Operation:

If the emergency standby engine is located on school grounds or within 500 feet of any school grounds, the following requirements shall apply:

The owner/operator shall not operate each stationary emergency standby diesel-fueled engine for non-emergency use, including maintenance and testing, during the following periods:

- a. Whenever there is a school sponsored activity (if the engine is located on school grounds)
- b. Between 7:30 a.m. and 3:30 p.m. on days when school is in session. "School" or "School Grounds" means any public or private school used for the purposes of the education of more than 12 children in kindergarten or any of grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in a private home(s). "School" or "School Grounds" includes any building or structure, playground, athletic field, or other areas of school property but does not include unimproved school property.

[Basis: "Stationary Diesel Engine ATCM" section 93115,

title 17, CA Code of Regulations, subsection
(e)(2)(A)(1)] or (e)(2)(B)(2)]

RECOMMENDATION

Issue Authority to Construct to Pacific Bell Telephone Company DBA AT&T California for:

**S-2 Standby Diesel Generator Set, Engine Manufacturer: Caterpillar, Model C32 DI
ATAAC, Rated at 1502 Bhp (EPA Engine Family Name: 7 CPXL32 0ESK).**

by: _____ Date: 2/11/08 _____

Faye Bruno
Air Quality Engineer I