

Draft

**ENGINEERING EVALUATION
Comcast Cable
PLANT NO. 15957
APPLICATION NO. 18010**

BACKGROUND

Comcast Cable of Santa Rosa, California is applying for an Authority to Construct and/or Permit to Operate a Standby Emergency Generator.

S-2 Stationary Standby Generator Set: Diesel Engine; Make: John Deere; Model: 3029TF270; Model Year: 2007; Rated Horsepower: 54 HP;

The standby generator will be located at 3242 Airway Drive, Santa Rosa, California 95403.

EMISSIONS SUMMARY

Annual Emissions:

The CARB certified emission factors and the ISO 8178-4 D2 Cycle (five mode index) emission factors for S-2 (54 HP- diesel engine) are listed below.

Pollutant	Emission Factors (g/bhp-hr)
NOx	4.60
CO	1.04
POC	0.24
PM10	0.12
SO2	0.000055

**The emission factor for SO2 is from Chapter 3, Table 3.4-1 of the EPA Document AP-42, Compilation of Air Pollutant Emission Factors.*

$$SO_2 \quad 8.09E-3 \text{ (\% S in fuel oil) lb/hp-hr} = 8.09E-3 \text{ (0.0015\% S) (454 g/lb)} = 0.000055 \text{ g/hp-hr}$$

S-2

$$\begin{aligned} \text{NOx} &= (4.60 \text{ g/hp-hr}) (54 \text{ hp}) (50 \text{ hr/yr}) (1\text{b}/454\text{g}) = 27.3 \text{ lb/yr} = 0.013 \text{ TPY} \\ \text{CO} &= (1.04 \text{ g/hp-hr}) (54 \text{ hp}) (50 \text{ hr/yr}) (1\text{b}/454\text{g}) = 6.1 \text{ lb/yr} = 0.003 \text{ TPY} \\ \text{POC} &= (0.24 \text{ g/hp-hr}) (54 \text{ hp}) (50 \text{ hr/yr}) (1\text{b}/454\text{g}) = 1.42 \text{ lb/yr} = 0.000 \text{ TPY} \\ \text{PM10} &= (0.12 \text{ g/hp-hr}) (54 \text{ hp}) (50 \text{ hr/yr}) (1\text{b}/454\text{g}) = 0.71 \text{ lb/yr} = 0.000 \text{ TPY} \\ \text{SO2} &= 0.000055\text{g/hp-hr} (54 \text{ hp}) (50 \text{ hr/yr}) (1\text{b}/454\text{g}) = 000 \text{ lb/yr} = 0.000 \text{ TPY} \end{aligned}$$

Maximum Daily Emissions:

A full 24-hour day will be assumed since no daily limits are imposed on intermittent and unexpected operations.

For S-2:

NOx	=	(4.60 g/hp-hr)	(54 hp)	(24 hr/day)	(lb/454g)	=	13.1 lb/day
CO	=	(1.04 g/hp-hr)	(54 hp)	(24 hr/day)	(lb/454g)	=	2.96 lb/day
POC	=	(0.24/hp-hr)	(54 hp)	(24 hr/day)	(lb/454g)	=	0.68 lb/day
PM10	=	(0.12 g/hp-hr)	(54 hp)	(24 hr/day)	(lb/454g)	=	0.34 lb/day
SO2	=	(0.000055 g/hp-hr)	(54 hp)	(24 hr/day)	(lb/454g)	=	0.00 lb/day

Plant Cumulative Increase: (tons/year)

Pollutant	Existing	New S-2	Total
NOx	0	0.013	0.013
CO	0	0.003	0.003
POC	0	0.000	0.000
PM10	0	0.000	0.000
SO2	0	0.000	0.000

This facility has one existing LOE natural gas engine permitted in application number 9199 in 2004.

Toxic Risk Screening:

The toxic emission of diesel particulate does exceed the District Risk Screening Trigger, as shown in Table (1) below, and a Risk Screening Analysis is necessary.

Table 1. Calculated incremental increase in diesel exhaust particulate matter for S-2

Source:	PM ₁₀ Emission Factor (g/HP-hr)	HP	Annual Usage (Hours/year) ¹	Diesel Exhaust Particulate Emissions (lb/year):	Trigger Level (lb/yr)	Risk Screen Required? (Yes/No)
2	0.12	54	50	0.71	0.58	Yes

Per the attached 6/12/2008 memo from Ted Hull, results from the health risk screening analysis, the maximally exposed industrial receptor is 0.4 in a million for 50 hours of operation per year. In accordance with the District's Regulation 2-5, this risk level is considered acceptable.

STATEMENT OF COMPLIANCE

The owner/operator of S-2 shall comply with Reg. 6 (Particulate Matter and Visible Emissions Standards) and Reg. 9-1-301 (Inorganic Gaseous Pollutants: Sulfur Dioxide for Limitations on Ground Level Concentrations). Since this engine meets TBACT for PM10 (<0.15 g/hp-hr), it is expected to comply with Reg. 6. Ultra-low sulfur diesel (15 PPM sulfur) will be used to meet the sulfur limitation of 0.5wt% in Reg. 9-1-304 as well as to minimize PM10 emissions. Because S-2 is an emergency standby generator, Reg. 9-8-110

(Inorganic Gaseous Pollutants: Nitrogen Oxides from Stationary Internal Combustion Engines) exempts the requirements for emission limits of Sections 9-8-301, 302, and 502. Allowable operating hours and the corresponding record keeping in Reg. 9-8-330 and 530 will be included in the Permit Conditions below.

This diesel engine is subject to the Stationary Diesel Airborne Toxics Control Measure (ATCM) and is considered a new stationary emergency standby diesel engine since it will be installed after January 1, 2005 and is larger than 50 HP. The requirements of the ATCM will be included in the permit conditions.

The project is considered to be ministerial under the 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 emissions factors and therefore is not discretionary as defined by CEQA. (Permit Handbook Chapter 2.3)

The project is over 1000 feet from the nearest school and therefore not subject to the public notification requirements of Reg. 2-1-412.

Best Available Control Technology:

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 or more per highest day of POC, NPOC, NO_x, CO, SO₂ or PM₁₀.

Based on the emission calculations above, the owner/operator of S-2 is subject to BACT for the following pollutants: NO_x. BACT 1 levels do not apply for 'engines used exclusively for emergency use during involuntary loss of power' as per Reference b, Document 96.1.2 of the BAAQMD BACT Guidelines for IC Engines. Hence, the owner/operator has to meet BACT 2 limits presented below.

POLLUTANT	BACT 1. Technologically Feasible/ Cost Effective 2. Achieved in Practice 3. TBACT	TYPICAL TECHNOLOGY
NO _x	1. 1.5 g/bhp-hr [107 ppmvd @ 15% O ₂] ^{a,b} 2. 6.9 g/bhp-hr [490 ppmvd @ 15% O ₂] ^{a,b,c} 3. 6.9 g/bhp-hr [490 ppmvd @ 15% O ₂] ²	1. Selective Catalytic Reduction (SCR) + Timing Retard + Turbocharger w/ Intercooler ^{a,b} 2. Timing Retard ≤ 4° + Turbocharger w/ Intercooler ^{a,b,c} 3. Timing Retard ≤ 4° + Turbocharger w/ Intercooler

The NOx emission limits set by BACT 2 are met, as shown in Table (2).

Table (2)

Pollutant	Engine Emission Factors (g/hp-hr)	Emission Factor Limits as set by BACT 2 (g/hp-hr)	Have the limits been met?
NOx	4.60	6.9	YES

Therefore, S-2 is determined to be in compliance with the BACT 2 limits for NOx.

Offsets: Offsets must be provided for any new or modified source at a facility that emits more than 10 tons/yr of POC or NOx. Based on the emission calculations above, offsets are not required for this application.

NSPS: The engine is subject to 40 CFR 60, Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines because it was manufactured after April 1, 2006, as required by Section 60.4200(a)(2)(i).

The engine has a total displacement of 2.9 liters. Each cylinder has a volume of less than 10 liters. The engine is a 2007 engine and is not a fire pump. Section 60.4205(b) requires these engines to comply with the standard in Section 60.4202 for all pollutants for the same model year and maximum engine power. Section 60.4202(a)(ii) requires that engines over 50 hp must meet the EPA standards in 40 CFR 89.112 and 40 CFR 89.113. For engines between 50 and 175 hp, these standards are:

HC: none
 NOX: 6.9 g/HP-hr
 CO: none
 PM: none

According to CARB Executive Order U-R-004-0276, the engine will comply with the NOx standard.

Sections 60.4206 and 60.4211(a) require that the owner/operator operate and maintain the engine according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine. .

Section 60.4207(a) requires that by October 1, 2007, the owner/operator must use fuel that complies with 40 CFR 80.510(a). This means that the fuel must have a sulfur content of 500 parts per million (ppm) maximum, a cetane index of 40 or a maximum aromatic content of 35 volume percent. .

Section 60.4207(b) requires that by October 1, 2010, the owner/operator must use fuel that complies with 40 CFR 80.510(b). This means that the fuel must have a sulfur content of 15 parts per million (ppm) maximum, and the same cetane index or aromatic content. .

Section 60.4209(a) requires a non-resettable hour meter. This requirement is already in the standard permit conditions.

The engine will comply with the requirements of Section 60.4211(b)(1) because it has been certified in accordance with 40 CFR Part 89.

The engine will comply with the requirement in Section 60.4211(e) to run for less than 100 hours per year for maintenance checks and readiness testing, and the prohibition of running for any reason other than emergency operation, maintenance, and testing because they are limited by permit condition to 50 hours per year for reliability testing and otherwise may only operate for emergencies.

The owner/operator is not required to perform tests in accordance with Section 60.4212 or 60.4213.

Section 60.4214 states that owner/operators do not have to submit an initial notification to EPA for emergency engines.

Because the engine does not have a diesel particulate filter, it is not subject to Section 60.4214(c).

The owner/operator is required to comply with certain sections of 40 CFR 60, Subpart A, General Provisions. .

NESHAP: This engine is not subject to 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, because it is not located at a major facility for hazardous air pollutants.

PSD, does not apply

PERMIT CONDITIONS

Application 18010: Comcast Cable: Plant 18010:
Conditions for S-2

PC 22850

- 1. Operating for reliability-related activities is limited to 50 hours per year per engine.**

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(2)(B)(3) or Regulation 2-5]

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

- f. Whenever there is a school-sponsored activity (if the engine is located on school grounds).
- g. 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 an Authority to Construct to Comcast Cable for:

S-2 Stationary Standby Generator Set: Diesel Engine; Make: John Deere; Model: 309TF270; Model Year; 2007; Rated Horsepower: 54 HP;

EXEMPTIONS

None.

By: _____ Date: 6/4/08

Sheryl Wallace
Air Quality Permit Technician