

**Engineering Evaluation Report  
Verint  
Application #26515; Plant # 22586**

**1. BACKGROUND**

This application is for a Permit to Operate a 2014, 755 Bhp diesel engine that is used as a driver for an emergency generator. The source description is as follows.

**S-1 Emergency Stand-by Diesel Generator 755 Bhp, Cummins 2014 Model QSX15-G9, EPA Certification Number ECXL015.AAJ(J103)**

The following school is within 1000' of the source S-1. Thus a public notice is required prior to issuing the permit.

Bracher Elementary School  
2700 Chromite Drive  
Santa Clara, CA 95051

**2. EMISSION CALCULATIONS**

**A. Calculations Basis:**

Hours of Operation, Annual:	50 (For maintenance and testing)
Engine Horsepower:	755
Fuel Usage Rate:	30.1 gallons per hour
Heating value	138,500 Btu/gallon or 19,487 Btu/lb
Density	7.008 lb/gallon
Sulfur Content (weight %)	0.0015%

Table 1, Emission Factors & Emissions

The following emission factors are manufacturer's performance test data (Cummins) that was done in accordance with EPA 40 CFR Part 89 Subpart D and ISO 8178 for measuring NMHC, CO, PM and NO<sub>x</sub>. These factors are used to calculate the emissions.

**Table 1: S-1 Emission Factors and Emissions**

<b>FACTORS</b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>NMHC</b>	<b>PM10</b>	<b>SO<sub>2</sub>**</b>
Emission Factors (g/bhp-hr)	0.4	3.7	0.2	0.08	0.004
Emissions (lb/year)	33.1	307.7	18.6	6.7	0.3
Emission (ton/year).	0.017	0.154	0.01	0.003	Negligible
Emissions (lb/day max.}***	16.0	147.7	8.0	3.2	0.1

\*\* SO<sub>2</sub> emission factor calculated based on 0.0015 weight % Sulfur in the fuel

\*\*\* Pound per day maximum is based on 24 hour continuous operation in case of a major power outage.

**B. Cumulative Increase**

Table 2 summarizes the cumulative increase in criteria pollutant emissions that will result from the operation of S-1 for 50 hours annually for testing and maintenance.

**Table 2: S-1 Cumulative Increase**

<b>Pollutant</b>	<b>Current Emissions (since April 5, 1991) (TPY)</b>	<b>Increase with this application (TPY)</b>	<b>Cumulative Emissions (Current + Increase) (TPY)</b>
CO	0.000	0.017	0.017
NO <sub>x</sub>	0.000	0.154	0.154
POC	0.000	0.010	0.010
PM <sub>10</sub>	0.000	0.003	0.003
SO <sub>2</sub>	0.000	Negligible	0

### **3. COMPLIANCE STATEMENT**

#### **TOXIC RISK SCREENING ANALYSIS**

This application required a Toxics Risk Screen because diesel particulate emissions are greater than the toxic trigger level as presented in Table 3.

**Table 3: PM Emission and Trigger Level**

<b><u>Toxic Pollutant</u></b>	<b><u>Emission Rate (lb/yr)</u></b>	<b><u>Risk Screening Trigger (lb/yr)</u></b>
Diesel Particulate	6.7 (50 hours/y operation)	0.34

Source S-1 meets Best Available Control Technology for toxics (TBACT) since the diesel particulate emission is 0.08 g/bhp-hr, less than the required 0.15 g/bhp-hr. For an engine that meets the TBACT requirement, it must also pass the toxic risk screening level of less than ten in a million. Estimates of residential risk assume exposure to annual average toxic air contaminant concentrations occur 24 hours per day, 350 days per year, for a 70-year lifetime. Risk estimates for offsite workers assume exposure occurs 8 hours per day, 245 days per year, for 40 years. Risk estimates for students assume a higher breathing rate, and exposure is assumed to occur 10 hours per day, 36 weeks per year, for 9 years.

Based on 50 hours per year of operation, the emergency generator passes the Health Risk Screening Analysis (HRSA) conducted on October 2, 2014 by the District's Toxic Evaluation Section. The risks to the maximally exposed residential and industrial receptors are 1.7 and 8.5 chances in a million respectively. Further, the hazard indices to the residential and industrial receptors are 0.00061 and 0.0061 respectively. Thus the yearly allowable hours are 50 hours of operation for testing and maintenance activities. In accordance with the District's Regulation 2, Rule 5, this risk level is considered acceptable, as it has been determined that S-1 meets the current TBACT standards. Thus the risk screen passes for 50 hours operation per year.

**The project is within 1000 feet from the following school and therefore is subject to the public notification requirements of Reg. 2-1-412.**

**Bracher Elementary School  
2700 Chromite Drive  
Santa Clara, CA 95051**

Thus the risk screen included the risk to the school students and workers due to exposure to TACs emitted due to the operation of the diesel engine. The risk to the students at the school is 0.018 chances in a million and the hazard index is 0.000015. A public notice is required in

accordance with Regulation 2-1-412 prior to issuing the permit.

Since the school is within 1000 feet of the source S-1 a condition will be imposed to not operate the engine for testing and maintenance when the school is in session and when children are present. Thus the risk to children due to source S-1 operation is minimized. Further a public notice will be issued to the parents of the school children and to residents living within 1000 feet of the source S-1.

**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 or more per day of POC, NPOC, NO<sub>x</sub>, CO, SO<sub>2</sub> or PM<sub>10</sub>.

For S-1 BACT is triggered for NO<sub>x</sub> and CO since the maximum daily emission of this pollutant exceeds 10 lb/day. BACT is presented in the current BAAQMD BACT/TBACT Workbook for IC Engine – Compression Ignition: Stationary Emergency, non-Agricultural, non-direct drive fire pump, Document # 96.1.3, Revision 7 dated 12/22/2010 as presented in Table 4: Bact for Ic Engine-Compression Ignition. Also Table 5 presents BACT 2 Emission Limits Based on CARB ATCM which is considered BACT 2.

TABLE 4: BACT for IC Engine – Compression Ignition

<b>Source:</b>	<b>IC Engine – Compression Ignition: Stationary Emergency, non- Agricultural, non-direct drive fire pump</b>	<b>Revision:</b>	<b>7</b>
		<b>Document #:</b>	<b>96.1.3</b>
<b>Class:</b>	<b>&gt; 50 BHP Output</b>	<b>Date:</b>	<b>12/22/2010</b>
<b>POLLUTANT</b>	<b>BACT 1. Technologically Feasible/ Cost Effective 2. Achieved in Practice 3. TBACT</b>	<b>TYPICAL TECHNOLOGY</b>	
<b>POC</b>	1. n/s <sup>c</sup> 2. CARB ATCM standard <sup>a</sup> for POC at applicable horsepower rating (see attached Table).	1. n/s <sup>c</sup> 2. Any engine certified or verified to achieve the applicable standard. <sup>a</sup>	
<b>NO<sub>x</sub></b>	1. n/s <sup>c</sup> 2. CARB ATCM standard <sup>a</sup> for NO <sub>x</sub> at applicable horsepower rating (see attached Table ).	1. n/s <sup>c</sup> 2. Any engine certified or verified to achieve the applicable standard. <sup>a</sup>	
<b>SO<sub>2</sub></b>	1. n/s <sup>c</sup> 2. Fuel sulfur content not to exceed 0.0015% (wt) or 15 ppm (wt).	1. n/s <sup>c</sup> 2. CARB Diesel Fuel (Ultra Low Sulfur Diesel)	
<b>CO</b>	1. n/s <sup>c</sup> 2. CARB ATCM standard <sup>a</sup> for CO at applicable horsepower rating (see attached Table).	1. n/s <sup>c</sup> 2. Any engine certified or verified to achieve the applicable standard. <sup>a</sup>	
<b>PM<sub>10</sub></b>	1. n/s <sup>c</sup> 2. 0.15 g/bhp-hr  3. 0.15 g/bhp-hr	1. n/s <sup>c</sup> 2. Any engine or technology demonstrated, certified or verified to achieve the applicable standard. 3. Any engine or technology demonstrated, certified or verified to achieve the applicable standard.	
<b>NPOC</b>	1. n/s <sup>c</sup> 2. n/s <sup>c</sup>	1. n/s <sup>c</sup> 2. n/s <sup>c</sup>	

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**Reference:**

a. ATCM standard (listed below): Where NMHC + NO<sub>x</sub> is listed (with no individual standards for NO<sub>x</sub> or NMHC) as the standard, the portions may be considered 95% NO<sub>x</sub> and 5% NMHC. For the purposes of determining BACT NMHC = POC. Any engine which has been certified or demonstrated to meet the current year tier standard may be considered compliant with the certified emission standard for that pollutant.

b. Deleted (no longer applies).

c. Cost effectiveness analysis must be based on lesser of 50 hr/yr or non-emergency operation as limited by District health risk screen analysis.

**Table 5: BACT 2 Emission Limits based on CARB ATCM**

Emissions Standards for Stationary Emergency Standby Diesel-Fueled CI Engines >50 BHP g/kW-hr (g/bhp-hr)			
Maximum Engine Power	PM	NMHC+NO <sub>x</sub>	CO
37 < KW < 56 (50 < HP < 75)	0.20 (0.15)	4.7 (3.5)	5.0 (3.7)
56 < KW < 75 (75 < HP < 100)	0.20 (0.15)	4.7 (3.5)	5.0 (3.7)
75 < KW < 130 (100 < HP < 175)	0.20 (0.15)	4.0 (3.0)	5.0 (3.7)
130 < KW < 225 (175 < HP < 300)	0.20 (0.15)	4.0 (3.0)	3.5 (2.6)
225 < KW < 450 (300 < HP < 600)	0.20 (0.15)	4.0 (3.0)	3.5 (2.6)
450 < KW < 560 (600 < HP < 750)	0.20 (0.15)	4.0 (3.0)	3.5 (2.6)
KW > 560 (HP > 750)	0.20 (0.15)	6.4 (4.8)	3.5 (2.6)

BACT(2) requires a particulate emission factor of 0.15 g/bhp-hr or less, NO<sub>x</sub> emission factor of 4.6 g/bhp-hr or less and a CO emission factor of 2.6 g/bhp-hr or less. BACT(1) has not been determined. S-1 meets the BACT II requirements based on the emission factors calculated using D2-cycle testing.

**OFFSETS**

Offsets must be provided for any new or modified source at a facility that emits more than 10 tons/yr of POC or NO<sub>x</sub> per Regulation 2-2-302. Table 2 summarizes increases in criteria pollutant emissions resulting from the operation of source S-1. Offsets are not triggered for the source.

**NSPS**

The engine is subject to 40 CFR 60, Subpart IIII, 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).

Source S-1 is a 6 cylinder and has a volume of less than 10 liters per cylinder. The engine is a 2014 model year engine and is not a fire pump. Section 60.4205(b) requires these engines to comply with the emission standards cited in Section 60.4202, which refers to 40CFR89.112 and 40CFR89.113 for all pollutants. For engines greater than 750 hp engines these standards are as follows:

NMHC+NO<sub>x</sub>: 4.8 g/hp-hr  
CO: 2.6 g/hp-hr  
PM: 0.15 g/hp-hr  
20% opacity during acceleration mode  
15% opacity during lugging mode  
50% opacity during peaks in acceleration or lugging mode

According to emissions factor calculated from the Exhaust Emission Data Sheet, the engine will comply with the standards.

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. The owner/operator is expected to comply with this requirement.

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. The owner/operator is expected to comply with this requirement because CARB diesel is required to be used in California.

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 as above. The owner/operator is expected to comply with this requirement because CARB diesel is required to be used in California.

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(c) 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, the owner/operator 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. The owner/operator is expected to comply with this requirement.

### **NESHAP**

This engine is not subject to the emission or operating limitations in 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, because they are emergency stationary reciprocating internal combustion engines (40 CFR 63.6600(c)).

### **CARB STATIONARY DIESEL ENGINE ATCM**

The State Office of Administrative Law approved the Airborne Toxic Control Measure (ATCM) on November 8, 2004. State law requires the local Air Districts to implement and enforce the requirements of the ATCM. Effective May 19<sup>th</sup>, 2011, there is a prohibition on the operation of new diesel emergency standby engines greater than 50 bhp unless the following operating requirements and emission standards are met:

“Stationary Diesel Engine ATCM” section 93115.6 (3)(A), title 17, CA Code of Regulations.

1. New stationary emergency standby diesel-fueled engines (>50 bhp) shall:
  - a. meet the applicable emission standards for all pollutants for the same model year and maximum horsepower rating as specified in the following meet the applicable emission standards for all pollutants for the same model year and maximum horsepower Table Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines, in effect on the date of acquisition or submittal, and
  - b. after December 31, 2008, be certified to the new non-road compression-ignition (CI) engine emission standards for all pollutants for 2007 and later model year engines as specified in 40 CFR, PART 60, Subpart III-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines(2006); and
  - c. not operate more than 50 hours per year for maintenance and testing purposes.
2. The District may allow a new stationary emergency standby diesel-fueled CI engine (> 50 hp) to operate up to 100 hours per year for maintenance and testing purposes on a site-specific basis, provided the diesel PM emission rate is less than or equal to 0.01 g/bhp-hr.

**Table 6: Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines**

Maximum Engine Power	Model Year	PM g/bhp-hr (g/kW-hr)	NMHC+NO <sub>x</sub> g/bhp-hr (g/kW-hr)	CO g/bhp-hr (g/kW-hr)
50 = HP < 75 (37 = kW < 56)	2007	0.15 (0.20)	5.6 (7.5) 3.5 (4.7)	3.7 (5.0)
	2008+			
75 = HP < 100 (56 = kW < 75)	2007	0.15 (0.20)	5.6 (7.5) 3.5 (4.7)	3.7 (5.0)
	2008+			
100 = HP < 175 (75 = kW < 130)	2007	0.15 (0.20)	3.0 (4.0)	3.7 (5.0)
	2008+			
175 = HP < 300 (130 = kW < 225)	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
	2008+			
300 = HP < 600 (225 = kW < 450)	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
	2008+			
600 = HP < 750 (450 = kW < 560)	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
	2008+			
HP > 750 (kW > 560)	2007	0.15 (0.20)	4.8 (6.4)	2.6 (3.5)
	2008+			

This emergency standby diesel engine (S-1) is in compliance with the above ATCM requirements. The diesel engine will operate for no more than 50 hours per year for maintenance and reliability testing. This engine is subject to the Current off-road CI engine standards for PM<sub>10</sub>, NMHC+NO<sub>x</sub> and CO. As shown in the Table 7, the engine meets these requirements.

**Table 7: ATCM Compliance**

Pollutant	S-1 Emission Factors (g/bhp-hr)	ATCM Requirement (g/bhp-hr)
NMHC+NO <sub>x</sub>	3.9	4.8
CO	0.4	2.6
PM <sub>10</sub>	0.08	0.15



**CEQA**

This project is considered to be ministerial under the District's CEQA Regulation 2-1-311, Permit Handbook Chapter 2.3.1. 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.

**District Regulations**

Source S-1 complies with the following District Regulations:

**Permits – General Requirements, Regulation 2 Rule 1**

Source S-1 is located less than 1,000 feet from the following school and therefore it is subjected to the public notification requirements of Regulation 2-1-412.

Bracher Elementary School  
2700 Chromite Drive  
Santa Clara, CA 95051

**Regulation 9 Rule 8: Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines.**

Source S-1 is exempt from the requirements of Sections 9-8-301, 302, 303, 304 and 305 in accordance with Regulation 9-8-111.3 since it operates less than 100 hours in any consecutive 12-month period.

**Regulation 9-8-530: Emergency Standby and Low Usage Engines, Monitoring and Recordkeeping:**

Source S-1 is expected to comply with this Regulation requiring a non-resettable totalizing meter that measures hours of operation or fuel usage, and record keeping requirements by imposing the condition.

**Regulation 9-1-301: Limitation of Ground Level Concentration of SO<sub>2</sub>:**

Source S-1 is expected to comply with this regulation since 0.0015% ultra-low sulfur diesel will be used.

**Regulation 6-301: Particulate and Visible Emissions**

Source S-1 is expected to comply with Regulation 6-1-301 Ringelman limitation, 6-1-305 visible particulate limitation and 6-1-310 of 0.15 grains/dscf limitation, since S-1 is a 2007 model engine and the particulate emission is 0.1 g/bhp-hr which is less than the BACT threshold of 0.15 g/bhp-hr.

**4 CONDITION**

**Verint  
Application #26515; Plant # 22586  
Condition #22850**

The condition applies to the following source:

**S-1 Emergency Stand-by Diesel Generator 755 Bhp, Cummins 2014 Model QSX15-G9, EPA Certification Number ECXL015.AAJ(J103)**

- 1 The owner/operator shall not exceed 50 hours per year per engine for reliability-related testing. [Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary IC Engines]
- 2 The owner/operator shall operate each emergency standby engine only for the following

purpose: 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: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

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: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]
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: Title 17, California Code of Regulations, section 93115, ATCM for Stationary IC Engines]
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, athletic field, or other areas of school property but does not include unimproved school property
- [Basis: Title 17, California Code of Regulations, section 93115, ATCM]

## 5. RECOMMENDATION

The District has reviewed the material contained in the permit application for the proposed project and has made a preliminary determination that the project is expected to comply with all applicable requirements of District, state, and federal air quality-related regulations. The preliminary recommendation is to issue an Authority to Construct for the equipment listed below. However, the proposed source will be located within 1000 feet of a school, which triggers the public notification requirements of District Regulation 2-1-412. After the comments are received and reviewed, the District will make a final determination on the permit.

I recommend that the District initiate a public notice and consider any comments received prior to taking any final action on issuance of an Authority to Construct for the following source:

**S-1 Emergency Stand-by Diesel Generator 755 Bhp, Cummins 2014 Model QSX15-G9, EPA Certification Number ECXL015.AAJ(J103)**

**6. EXEMPTIONS**

None

By: \_\_\_\_\_  
Hari S Doss,  
Air Quality Engineer

Date: