

**ENGINEERING EVALUATION**  
**Sequoia Union High School District**  
**Plant No. 23017**  
**Application No. 27119**

**BACKGROUND**

Sequoia Union High School District has applied to obtain an Authority to Construct (AC) and/or a Permit to Operate (PO) for the following equipment:

**S-1      Emergency Standby Diesel Generator Set**  
**2014 Iveco/FPT, Model F4GE9685A\*J**  
**198 bhp, 1.38 MMBtu/hr**

The Emergency Standby Diesel Engine Set (S-1) will be located at 1090 Mills Way, Redwood City, CA 94063 and is equipped with the Best Available Control Technology (BACT) for minimizing the release of air borne criteria pollutants and harmful air toxins due to fuel combustion. The criteria pollutants are NO<sub>x</sub>, CO, POC from unburned diesel fuel, SO<sub>2</sub> and PM<sub>10</sub>. All of these pollutants are briefly discussed on the District's web site at [www.baaqmd.gov](http://www.baaqmd.gov).

S-1 meets the Environmental Protection Agency and California Air Resources Board (EPA/CARB) Tier 3 Off-road standard. The engine will burn commercially available California low sulfur diesel fuel. The sulfur content of the diesel fuel will not exceed 0.0015% by weight. The operation of the engine should not pose any health threat to the surrounding community or the public at large.

**EMISSIONS**

Basis:

- 198 hp output rating.
- 50 hr/yr operation for testing and maintenance.
- 10.04 gallons/hr max fuel use rate.
- NMHC + NO<sub>x</sub>, CO, and PM<sub>10</sub> emission factors are EPA-certified emission levels (for EPA engine family name of EFPXL06.7DGB), per manufacturer's performance data sheet issued by Generac Industrial Power.
- POC is assumed to be 5% of NMHC + NO<sub>x</sub>
- NO<sub>x</sub> is assumed to be 95% of NMHC + NO<sub>x</sub>
- SO<sub>2</sub> emissions are quantified based on the full conversion of 0.0015 wt% (~ 15 ppm) sulfur in the ULS diesel fuel. The SO<sub>2</sub> emission factor was derived from EPA AP-42, Table 3.4-1.

**Annual Average Emissions:**

Annual emissions are calculated based on the number of hours per year of operation for testing and maintenance. See Table 1.

**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 of operation will be assumed since no daily limits are imposed on intermittent and unexpected operations. See Table 1.

**Table 1. Annual and Daily Emissions from CARB/EPA Certified Data**

Source	Operating Hours (hr/yr)	Max Rated Output (bhp)	Fuel Use Rate (gal/hr)	Calculated MMBtu/hr	Pollutant	E.F. (g/bhp-hr)	Max Daily Emissions (lb/day)	Annual Emissions (lb/yr)	Annual Emissions (TPY)
S-1	50	198	10.04	1.38	NO <sub>x</sub>	2.66	27.8	58.0	0.029
					POC	0.14	1.5	3.1	0.002
					CO	0.70	7.3	15.3	0.008
					PM <sub>10</sub>	0.12	1.3	2.6	0.001
					SO <sub>2</sub> <sup>1</sup>	0.001515	0.1	0.1	0.000

<sup>1</sup>Notes: SO<sub>2</sub> emission factor from AP-42 Table 3.4-1, SO<sub>2</sub> (15 ppm) E.F. is 0.001515 lb SO<sub>2</sub>/MMBtu.

**PLANT CUMULATIVE INCREASE**

Sequoia Union High School District (Plant No. 23017) is a new facility. Therefore, the District's database assumes zero existing emissions at the plant. Table 2 summarizes the cumulative increase in criteria pollutant emissions that will result at Plant 23017 from the operation S-1.

**Table 2. Plant Cumulative Emissions Increase, Post 4/5/91**

Pollutant	Existing Emissions, Post 4/5/91 (TPY)	New Increase with This Application (TPY)	Cumulative Emissions (TPY)
NO <sub>x</sub>	0.000	0.029	0.029
POC	0.000	0.002	0.002
CO	0.000	0.008	0.008
PM <sub>10</sub>	0.000	0.001	0.001
SO <sub>2</sub>	0.000	0.000	0.000

**TOXIC RISK SCREENING ANALYSIS**

This application required a Toxics Risk Screening Analysis because the diesel particulate emissions from the operation of S-1 are greater than the toxic trigger level, as shown in Table 3. Regulation 2-5 requires that the cumulative impacts from all related projects permitted within the last two years be included in the risk screening analysis. Since Plant 23017 is a new facility, no related project existed within the last two years.

**Table 3: Diesel Exhaust Particulate Matter Emissions**

Application No.	Source No.	A/C Issuance Date	P/O Issuance Date	Max. Rated Output (bhp)	PM10 EF (g/bhp-hr)	Annual Operating Hours (hrs/yr)	Diesel Exhaust Particulate Emissions (lb/yr)	TAC Trigger Level (lb/yr)
27119	1	(None)	(None)	198	0.12	50	2.6	0.34

S-1 meets Best Available Control Technology for Toxics (TBACT) since the diesel particulate emissions are less than 0.15 g/bhp-hr. S-1 will also result in health impacts of less than 10 in a million cancer risk and less than 1.0 chronic hazard index based on conservative HRSA screening procedures.

### **BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

In accordance with Regulation 2-2-301, 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<sub>x</sub>, CO, SO<sub>2</sub> or PM<sub>10</sub>.

BACT is triggered for NO<sub>x</sub>, since the maximum daily emission of this pollutant exceeds 10 lb/day per source. Please refer to the discussion on “Daily Emissions” on page 1 of this evaluation. BACT for this source 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. For NO<sub>x</sub> and CO, BACT(2) is the CARB ATCM standard for the respective pollutant at applicable horsepower rating. BACT(1) has not been determined.

S-1 satisfies the current BACT(2) standards for NO<sub>x</sub> (3.0 g/bhp-hr of POC+NO<sub>x</sub>). The more restrictive BACT(1) standards are not applicable to this engine because it will be limited to operation as an emergency standby engine.

### **OFFSETS**

Per Regulation 2-2-302, before an Authority to Construct or a Permit to Operate is issued for a new or modified source at a facility emitting 10 tons per year or more, on a pollutant specific basis, of POC or NO<sub>x</sub>, emission offsets shall be provided. Offsets are not required for this project because the facility-wide emission for POC and NO<sub>x</sub> are less than 10 tons per year.

### **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).

S-1 engine has a total displacement of 6.7 liters and has 6 cylinders. Therefore, each cylinder has a volume of less than 10 liters. 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 in Section 60.4202, which refers to 40CFR89.112 and 40CFR89.113 for all pollutants.

For engines that have a maximum output rating greater than or equal to 175 hp and less than 300 hp, these standards are:

NMHC+NO<sub>x</sub>: 3.0 g/hp-hr

CO: 2.6 g/hp-hr

PM: 0.15 g/hp-hr

According to EPA certification for engine family name of EFPXL06.7DGB, 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(b) requires that beginning 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(f) 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 it is 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.

#### **NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP)**

This engine is 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. Per 40 CFR 63.6590(c)(1), a new or reconstructed stationary RICE located at an area source must meet the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines. This engine is in compliance with the requirements of 40 CFR part 60 subpart IIII, as shown in the "NSPS" section of this evaluation.

#### **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 January 1, 2005, there is a prohibition on the operation of new diesel emergency standby engines greater than 50 bhp unless all of the following operating requirements and emission standards are met:

##### **"Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations.**

##### **Emissions Standards and Hours of Operating Requirements for New Stationary Emergency Standby Diesel-Fueled Engines (>50 bhp):**

- a. meet the applicable emission standards for all pollutants for the same model year and maximum horsepower rating as specified in Table 1 Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines, in effect on the date of acquisition or submittal, as defined in section 93115.4

<b>Table 1: Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines g/bhp-hr (g/kW-hr)</b>				
<b>Maximum Engine Power</b>	<b>Model year(s)</b>	<b>PM</b>	<b>NMHC+NOx</b>	<b>CO</b>
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+			

1. May be subject to additional emission limitations as specified in current applicable district rules, regulations or policies.

- b. after December 31, 2008, be certified to the new nonroad compression-ignition (CI) engine emission standards for all pollutants for 2007 and later model year engines as specified in 40 CFR, PART 60, Subpart IIII-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, except as provided in 93115.6(a)(3)(A)2. This subsection does not limit engine operation for emergency use and for emission testing to show compliance with 93115.6(a)(3).

Emergency standby diesel engine S-1 (1) meets the emission standards for all pollutants set in Table 1 Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines, (2) is subject to and in compliance with the EPA Tier 3 off-road CI engine standards, and (3) will operate for no more than 50 hours per year for maintenance and reliability testing per engine. Therefore, the diesel engine is in compliance with the above ATCM requirements.

**STATEMENT OF COMPLIANCE**

Source S-1 is subject to and expected to be in compliance with the requirements of District Regulation 1-301 (*Public Nuisance*), Regulation 6-1-303 (*Particulate Matter and Visible Emissions*), Regulation 9-1 (*Sulfur Dioxide*) and Regulation 9-8 (*NOx and CO from Stationary Internal Combustion Engines*). In order to ensure compliance with the requirements of these regulations, the facility will be conditionally permitted to meet the requirements.

From Regulation 1-301, no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public; or which endangers the comfort, repose, health or safety of any such persons or the public, or which causes, or has a natural tendency to cause, injury or damage to business or property. For purposes of this section, three or more violation notices validly issued in a 30 day period to a facility for public nuisance shall give rise to a rebuttable presumption that the violations resulted from negligent conduct.

S-1 is subject to the limitations of Regulation 6-1-303 (*Particulate Matter*). Regulation 6-1-303 states that a person shall not emit for a period or periods aggregating more than three minutes in any hour, a visible emission that is as

dark or darker than No. 2 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree, nor shall said emission, as perceived by an opacity sensing device in good working order, where such device is required by District Regulations, be equal to or greater than 40% opacity. This low PM<sub>10</sub> emitting engine is not expected to produce visible emissions or fallout in violation of this regulation, and it will be assumed to be in compliance with Regulation 6 pending a regular inspection.

S-1 is also subject to the SO<sub>2</sub> limitations of Regulation 9-1-301 (*Limitations on Ground Level Concentrations of Sulfur Dioxide*), Regulation 9-1-302 (*Limitations Sulfur Dioxide Emissions*) and 9-1-304 (*Burning of Solid and Liquid Sulfur Dioxide Fuel*). From Regulation 9-1-301, the ground level concentrations of SO<sub>2</sub> will not exceed 0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours. Per Regulation 9-1-302, a person shall not emit from any source a gas stream containing sulfur dioxide in excess of 300 ppm (dry). And Regulation 9-1-304, states that a person shall not burn any liquid fuel having sulfur content in excess of 0.5% by weight. Compliance with Regulation 9-1 is very likely since diesel fuel with a 0.0015% by weight sulfur is mandated for use in California.

From Regulation 9-8 (*NO<sub>x</sub> and CO from Stationary Internal Combustion Engines*), Section 110.5 (*Emergency Standby Engines*), S-1 is exempt from the requirements of Regulations 9-8-301 (*Emission Limits on Fossil Derived Fuel Gas*), 9-8-302 (*Emission Limits on Waste Derived Fuel Gas*), 9-8-303 (*Emissions Limits – Delayed Compliance, Existing Spark-Ignited Engines, 51 to 250 bhp or Model Year 1996 or Later*), 9-8-304 (*Emission Limits – Compression-Ignited Engines*), 9-8-305 (*Emission Limits – Delayed Compliance, Existing Compression-Ignited Engines, Model Year 1996 or Later*), 9-8-501 (*Initial Demonstration of Compliance*) and 9-8-503 (*Quarterly Demonstration of Compliance*). However, it is subject to the monitoring and record keeping procedures described in Regulation 9-8-530 (*Emergency Standby Engines, Monitoring and Recordkeeping*). The requirements of this Regulation are included in the permit conditions below.

S-1 is also subject to and expected to comply with Regulation 9-8-330 (*Emergency Standby Engines, Hours of Operation*) since non-emergency hours of operation will be limited in the permit conditions to 50 hours per year.

As determined using the District's HRSA Streamline Policy Checklist for Stationary Emergency Standby and Fire Pump Diesel Engines, this application qualifies for the District's May 6, 2015 HRSA Streamline Policy for Stationary Diesel Fired IC Engines Used for Backup Power or Fire Pumps. Based on this policy, the District has determined that this project will comply with District TBACT requirements and will result in health impacts of less than 10 in a million cancer risk and less than 1.0 chronic hazard index based on conservative HRSA screening procedures. Therefore, this project will comply with Regulation 2, Rule 5, Section 301 and 302. A refined HRSA is not required for this application.

This application is considered to be ministerial under the District's 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 in accordance with Permit Handbook Chapter 2.3.

PSD is not triggered.

The facility is less than 1,000 feet from the nearest school and is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice was prepared and sent to all addresses within 1,000 feet of the emergency diesel generator set and parents and guardians of students of the following school(s):

Summit Preparatory Charter High School  
890 Broadway  
Redwood City, CA 94063

**PERMIT CONDITIONS**

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

- 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)]

*End of Conditions*

**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 sources will be located within 1,000 feet of at least one school, which triggers the public notification requirements of 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 and/or a Permit to Operate for the following source:

**S-1      Emergency Standby Diesel Generator Set  
2014 Iveco/FPT, Model F4GE9685A\*J  
198 bhp, 1.38 MMBtu/hr**

**Prepared by:** \_\_\_\_\_ **Date:** \_\_\_\_\_

*Ying Yu, Air Quality Technician*