

**Draft Engineering Evaluation  
Atria Foster Square  
707 Thayer Lane, Foster City, CA 94404  
Plant No. 23350  
Application No. 27630**

**Project Description: New Stationary Emergency Diesel Engine-Generator Set**

**BACKGROUND**

Atria Foster Square has applied to obtain an Authority to Construct (ATC) and/or Permit to Operate (PTO) for the following equipment:

**S-1 Stationary Emergency Diesel Engine-Generator Set  
Make: Cummins; Model: QSL9-G7 NR3; Model Year: 2015  
464 BHp, 5.4 MMBtu/Hr**

The stationary emergency diesel engine-generator set (engine) will be situated at the bottom floor of the facility located on 707 Thayer Lane in Foster City, CA 94404 and operated by Atria Foster Square, a senior assisted living facility. The engine will provide support to facility operations during emergencies as defined by Regulation 9-8-23. The engine will be able to operate unrestricted during emergency use events. However, the engine’s annual maintenance and testing hours will be limited in accordance with the California Air Resources Board (CARB) “*Air Toxic Control Measure for Stationary Compression Ignition Engines*” (ATCM) or other District regulation. The criteria pollutants associated with the source are nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), precursor organic compounds (POC), sulfur dioxide (SO<sub>2</sub>), and particulate matter (PM).

The engine meets the Environmental Protection Agency (EPA) Tier 3 emission standards. The engine will burn commercially available CARB low sulfur diesel fuel. The sulfur content of the diesel shall 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 CALCULATIONS**

The applicant has submitted supporting documents, which includes manufacturer specifications. The following table provides a summary of the information provided by the applicant.

<b>Table 1. Engine Specifications and Certified Emission Factors</b>	
<b>Engine Manufacturer</b>	Cummins
<b>Model</b>	QSL9-G7 NR3
<b>Model Year</b>	2015
<b>Family Name</b>	FCEXL0540AAB
<b>Engine Power Rating, hp</b>	464
<b>Fuel Consumption, gal/hr</b>	38.9
<b>Displacement, L</b>	8.9
<b>NO<sub>x</sub> + Non-Methane Hydrocarbons (NMHC), g/kW-hr (g/hp-hr)*</b>	3.5 (2.6)
<b>CO, g/kW-hr (g/hp-hr)*</b>	2.3 (1.7)
<b>PM, g/kW-hr (g/hp-hr)*</b>	0.09 (0.07)

\*Manufacturer emission rates converted assuming 1 kW = 1.341 hp.

Table 2. Daily and Annual Potential to Emit (PTE) Emission Calculations							
Pollutant	Emission Rate (g/hp-hr)	Maximum Power Rating (hp)	PTE Daily Operating Hours <sup>1</sup> (hr/day)	PTE Daily Emissions (lb/day)	PTE Annual Operation <sup>2</sup> (hr/yr)	PTE Annual Emissions (lb/yr)	PTE Annual Emissions (ton/yr)
POC <sup>3,4</sup>	0.13	464	24	3.19	50	6.64	0.003
NO <sub>x</sub> <sup>4</sup>	2.47	464	24	60.59	50	126.22	0.063
CO	1.7	464	24	41.70	50	86.87	0.043
PM <sup>5</sup>	0.07	464	24	1.65	50	3.43	0.002
SO <sub>2</sub> <sup>6</sup>	-	-	-	0.20	-	0.41	0.000

<sup>1</sup>Maximum daily operation assumed to be 24 hours.

<sup>2</sup>Maximum annual operation will only include reliability-related activities as defined in Regulation 9-8-232.

<sup>3</sup>NMHC is assumed to be in the form of POC.

<sup>4</sup>Pursuant to the District *“Permit Handbook – Section 2.3.1 Stationary Diesel Engines”* (Permit Handbook), the emission factor for NO<sub>x</sub> + NMHC is assumed to be 5% NMHC and 95% NO<sub>x</sub>.

<sup>5</sup>PM is assumed to be in the form of PM with a diameter of less than 10 μm (PM<sub>10</sub>).

<sup>6</sup>SO<sub>2</sub> emissions are based upon the Permit Handbook. The Permit Handbook suggests the use of EPA AP-42, Table 3.4-1. Assuming a sulfur content of 15 ppm, pursuant to the fuel requirements of CARB, the emission factor equates to 0.001515 lbs SO<sub>2</sub>/MMBtu. The following provides the calculations for the daily and annual emission rates of SO<sub>2</sub>.

$$\frac{0.001515 \text{ lbs } SO_2}{\text{MMBtu}} \times \frac{38.9 \text{ gal diesel}}{\text{hr}} \times \frac{140 \text{ MMBtu}}{1,000 \text{ gal diesel}} \times \frac{24 \text{ hr}}{\text{day}} = 0.20 \text{ lbs } SO_2/\text{day}$$

$$\frac{0.001515 \text{ lbs } SO_2}{\text{MMBtu}} \times \frac{38.9 \text{ gal diesel}}{\text{hr}} \times \frac{140 \text{ MMBtu}}{1,000 \text{ gal diesel}} \times \frac{50 \text{ hr}}{\text{yr}} = 0.41 \text{ lbs } SO_2/\text{yr}$$

The following table provides the PTE for the facility.

Table 3. Facility Source PTE Emission Review			
Pollutant	Existing (ton/yr)	New (ton/yr)	Total (ton/yr)
POC	0.000	0.003	0.003
NO <sub>x</sub>	0.000	0.063	0.063
SO <sub>2</sub>	0.000	0.000	0.000
PM <sub>10</sub>	0.000	0.002	0.002
CO	0.000	0.043	0.043

**TOXIC RISK SCREENING ANALYSIS**

The engine is certified to the Tier 3 standards with a manufacturer's certified PM emission factor of 0.09 g/kW-hr. Using the manufacturer's certified PM emission factor for the engine, a 50 hour per year limit for reliability-related activities, and assuming PM is in the form of diesel exhaust PM, the following annual emission rate for diesel exhaust PM was calculated.

$$\frac{0.09 \text{ g PM}}{\text{kW-hr}} \times \frac{\text{kW}}{1.341 \text{ hp}} \times 464 \text{ hr} \times \frac{\text{lb}}{454 \text{ g}} \times \frac{50 \text{ hr}}{\text{yr}} = 3.43 \text{ lb PM/yr}$$

Pursuant to Regulation 2-5-110, the application is subject to the provisions of this rule since the increase in diesel exhaust PM emissions from the project is above the trigger level listed in Table 2-5-1 of this regulation.

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. The facility is new and has not submitted another application within the last two years, for which risk screening requirements were triggered.

The Health Risk Screening Analysis (HRSA) estimates residential risk assuming exposure to annual average toxic air contaminant concentrations occurring 24 hours per day, 350 days per year, for a 70-year lifetime. Risk estimate for offsite workers assumes an exposure that occurs 8 hours per day, 245 days per year, for 40 years. Risk estimate for students assumes higher breathing rates for children at exposures that occur 10 hours per day, 180 days per year, for 9 years.

Based on 50 operating hours per year of S-1, the project passed the HRSA conducted on February 24, 2016 by the District's Project Processing Section. The project poses no significant toxic risk, since the increased cancer risk to the maximally exposed receptor (residents) is 2.5 in a million. The hazard index for a resident is 0.00089. In addition, the increased cancer risk to workers and students of Ronald C. Wornick Jewish Day School are both 0.3 in a million. Furthermore, the hazard index to workers and students of Ronald C. Wornick Jewish Day School are 0.00024 and 0.00023, respectively.

The engine meets Best Available Control Technology for Toxics (TBACT), since the diesel particulate emissions are less than 0.15 g/bhp-hr. In addition, the project meets the risk requirements of Regulation 2-5-302, which are screening levels of less than ten in a million and a hazard index of less than 1.0.

**PLANT CUMULATIVE EMISSIONS**

707 Thayer Lane, Foster City, CA 94404 is a new facility. Table 4 summarizes the cumulative increase in criteria pollutant emissions that will result from the operation of S-1.

<b>Table 4. Facility Cumulative Increase Review</b>			
<b>Pollutant</b>	<b>Existing (ton/yr)</b>	<b>New (ton/yr)</b>	<b>Total (ton/yr)</b>
POC	0.000	0.003	0.003
NO <sub>x</sub>	0.000	0.063	0.063
SO <sub>2</sub>	0.000	0.000	0.000
PM <sub>10</sub>	0.000	0.002	0.002
CO	0.000	0.043	0.043

**BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

The engine has a NO<sub>x</sub> and CO PTE daily emission rate that exceeds 10 lbs. Pursuant to Regulation 2-2-301, the engine is required to apply BACT.

BACT for the engine is presented in the *“BAAQMD BACT Guideline – IC Engine-Compression Ignition: Stationary Emergency, Non-Agricultural, Non-Direct Drive Fire Pump”* (Workbook). The following table provides an analysis of the BACT requirements.

<b>Table 5. Analysis of BACT Requirements</b>			
<b>Pollutant</b>	<b>BACT Requirement</b>	<b>Engine Data</b>	<b>Compliance With Requirement</b>
NO <sub>x</sub>	CARB ATCM Standard for NO <sub>x</sub> at the applicable power rating, which is 2.85 g NO <sub>x</sub> /hp-hr for engines rated in between 300 hp to 600 hp.	2.47 g NO <sub>x</sub> /hp-hr	Yes
CO	CARB ATCM Standard for CO at the applicable power rating, which is 2.6 g CO/hp-hr for engines rated in between 300 hp to 600 hp.	1.7 g CO/hp-hr	Yes

According to the Workbook, BACT is the CARB ATCM standard for NO<sub>x</sub> and CO at the applicable horsepower rating. The Workbook mentions that if NO<sub>x</sub> and NMHC do not have individual standards, and are listed together, the portions may be considered 95% NO<sub>x</sub> and 5% NMHC. Applying the aforementioned methodology, the engine is expected to satisfy the BACT requirements for NO<sub>x</sub> and CO.

**OFFSETS**

Pursuant to Regulation 2-2-302, offsets must be provided for any new or modified source at a facility that emits, or is permitted to emit, more than 10 tons per year of POC or NO<sub>x</sub>.

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Furthermore, pursuant to Regulation 2-2-303 offsets must be provided for any new or modified source at a major facility with a cumulative increase that exceeds 1.0 ton per year of PM<sub>10</sub> or SO<sub>2</sub>. Pursuant to the definition of a “Major Facility” as defined in Regulation 2-6-212 and based upon Table 3, the facility is not defined as a major source. According to Table 3, Offsets are not required at this time.

**NEW SOURCES PERFORMANCE STANDARDS (NSPS)**

According to §60.4200(a)(1)(i), the engine is subject to the requirements of 40 CFR Part 60 Subpart III, “Standards of Performance of Stationary Compression Ignition Internal Combustion Engines.”

Pursuant to §60.4205(b), owners or operators of 2007 model year and later stationary emergency diesel engine-generator sets with a displacement of less than 30 liters must comply with §60.4202. In accordance with §60.4202(a)(2), the emission standards must meet those established in 40 CFR 89.112 and 40 CFR 89.113.

Pursuant to 40 CFR 89.112, engines with a rated power in between 225 kW to 450 kW must meet the following emission standards.

<b>Table 6. Standards/Review For Engines Rated At 225 kW To Less Than 450 kW</b>				
<b>Pollutant</b>	<b>NSPS Emission Standard (g/kW-hr)</b>	<b>NSPS Emission Standard (g/hp-hr)</b>	<b>Manufacturer’s Emission Rate (g/kW-hr)</b>	<b>Manufacturer’s Emission Rate (g/hp-hr)</b>
NO <sub>x</sub> + NMHC	4.0	3.0	3.5	2.6
CO	3.5	2.6	2.3	1.7
PM	0.20	0.15	0.09	0.07

The aforementioned analysis demonstrates that the engine will meet the emission standards of 40 CFR 89.112. In addition, the engine is expected to meet the following opacity standards identified in 40 CFR 89.113.

<b>Table 7. 40 CFR 89.113 Opacity Standards</b>	
<b>Mode</b>	<b>Opacity (%)</b>
Acceleration	20
Lugging	15
Peak (During acceleration or lugging modes)	50

§60.4206 and §60.4211(a) require the owner or operator to maintain and operate the engine according to the manufacturer’s written instructions or owner/operator developed procedures approved by the manufacturer for the entire life of the engine. The engine is expected to be maintained and operated in accordance with the requirements of §60.4206 and §60.4211(a).

§60.4207(b) requires diesel fuel consumed after October 1, 2010 to meet the requirements of 40 CFR 80.510(b), which is a maximum sulfur content of 15 parts per million (ppm). The fuel consumed is expected to meet this requirement.

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§60.4209(a) requires the installation of a non-resettable hour meter. This will be included as a permit requirement.

The engine is certified to the requirements of 40 CFR Part 89 and is expected to comply with §60.4211(c).

According to §60.4211(f), the engine will be allowed to operate unrestricted during emergencies. In addition, the engine will be limited to less than 100 hours per calendar year for maintenance and testing. However, the requirements of the CARB ATCM may further limit the maintenance and testing hours.

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

Pursuant to §63.6585, engines located at an area source are subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, *“National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.”* However, according to §63.6590(a)(1)(iii) & §63.6590(c)(1), diesel engines that commenced construction on June 12, 2006 or later and that operate at a facility that emits or has the potential to emit any single hazardous air pollutant (HAP) at a rate of less than 10 tons per year or any combination of HAPs at a rate of less than 25 tons per year, must comply instead with 40 CFR Part 60 Subpart III, *“Standards of Performance of Stationary Compression Ignition Internal Combustion Engines.”* The engine is expected to meet the requirements of this subpart by meeting the standards of 40 CFR Part 60 Subpart III, *“Standards of Performance of Stationary Compression Ignition Internal Combustion Engines.”*

**CARB AIRBORNE TOXIC CONTROL MEASURE FOR STATIONARY COMPRESSION IGNITION ENGINES**

§93115.2 requires any person who purchases a stationary compression ignition engine to meet the requirements of the ATCM.

As of January 1, 2006, owners and operators of new engines are required to consume CARB diesel fuel in accordance with §93115.5.

According to §93115.6(a)(1), an engine located within 500 feet of school grounds shall not operate for non-emergency use between 7:30 A.M. and 3:30 P.M. on days when school is in session. However, using the Universal Transverse Mercator (UTM) coordinates provided, it was determined that the engine is located greater than 500 feet from the school grounds of Ronald Wornick Jewish Day School.

Pursuant to §93115.6(a)(3), a new engine must meet the following requirements as of January 1, 2005.

- ATCM *“Table 1 Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines”* for same model year and maximum engine power, which is shown below;

<b>Table 8. ATCM “Table 1 Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines”</b>				
<b>Maximum Engine Power</b>	<b>Model Year</b>	<b>PM (g/bhp-hr)</b>	<b>NMHC+NO<sub>x</sub> (g/bhp-hr)</b>	<b>CO (g/bhp-hr)</b>
300 ≤ hp ≤ 600	2008+	0.15	3.0	2.6

- After December 31, 2008, be certified to the new non-road compression-ignition engine emission standard for all pollutants for 2007 and later model year engines as specified in 40 CFR, Part 60, Subpart III; and,
- Not operate more than 50 hours per year for maintenance and testing purposes, except as provided in §93115.6(a)(3)(A)(2). This regulation does not limit engine operation for emergency use and for emission testing to show compliance with §93115.6(a)(3).

The engine is expected to meet the aforementioned emission requirements and will be limited, through permit condition, to operate unrestricted only for emergencies and a maximum of 50 hours per year for maintenance and testing purposes. In addition, the permit will include near-school operating provisions that meet the requirements of §93115.6(a)(1).

Pursuant to §93115.10(d) (1) a non-resettable hour meter with a minimum display capability of 9,999 hours shall be installed upon engine installation. The owner/operator of the engine shall keep monthly records of the following for 36 months, with the prior 24 months readily accessible at the site and the prior 25 to 36 months available to the District within 5 working days from the request.

- Emergency use hours of operation;
- Maintenance and testing hours of operation;
- Hours of operation for emission testing to show compliance with §93115.6(a)(3) and §93115.6(b)(3);
- Initial start-up testing hours;
- If applicable, hours of operation to comply with the requirements of NFPA 25;
- Hours of operation for all uses other than those specified in §93115.10(g)(1)(A) through (D);
- If applicable, DRP engine hours of operation; and,
- The fuel used.

**STATEMENT OF COMPLIANCE**

**Regulation 1**

The engine is subject to and expected to be in compliance with the requirements of Regulation 1-301 (Public Nuisance).

**Regulation 2, Rule 1**

Pursuant to Regulation 2-1-114.2.1, internal combustion engines greater than 50 hp are subject to the requirements of Regulation 2-1. According to Regulation 2-1-301, prior to the installation of the equipment, an ATC must be obtained. The facility has submitted an application and is expected to be in compliance with Regulation 2-1.

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Furthermore, the facility has certified that the source will be located within 1,000 feet of the outer boundary of any K-12 school site. Therefore, the requirements of the California Health & Safety Code §42301.6 are applicable at this time. The facility will have to perform a public notification in accordance with California Health & Safety Code §42301.6.

**Regulation 2, Rule 2**

Pursuant to Regulation 2-2-301, BACT is required for a new source with PTE emission increases that equal 10.0 lbs or greater of POC, NPOC, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, or CO. The engine is expected to exceed the BACT thresholds for NO<sub>x</sub> and CO. However, the engine meets the BACT requirements for NO<sub>x</sub> and CO in accordance with the Workbook.

Furthermore, pursuant to Regulation 2-2-302, a facility that emits more than 10 tons of POC or NO<sub>x</sub> per year is subject to offsets. The facility is not expected to emit more than 10 tons of POC or NO<sub>x</sub> per year and will not require the provision of offsets.

Lastly, the facility is not expected to emit greater than 100 tons per year or more of any air pollutant subject to regulation under the Clean Air Act or 10 tons of a single hazardous air pollutant (HAP) or 25 tons of a combination of HAPs per year. The facility is not a major facility and is not required to meet the requirements of Regulation 2-2-303 (Offsets for PM<sub>10</sub> and SO<sub>x</sub>), 2-2-304 (Prevention of Significant Deterioration (PSD)), and 2-2-405 (Publication and Public Comment).

**Regulation 2, Rule 5**

Pursuant to Regulation 2-5-110, the provisions of this rule are not subject to sources with an increase in emissions less than the trigger levels listed in Table 2-5-1. The engine is expected to exceed the diesel exhaust PM trigger level of 0.34 lbs per year at an emission rate of 3.43 lbs per year. The provisions of this rule apply to the engine.

Based on 50 hours per year of operation, the project passed the HRSA conducted on February 24, 2016 by the District's Toxics Evaluation Section.

The engine meets TBACT since the diesel particulate emissions are less than 0.15 g/bhp-hr. In addition, the project meets the risk requirements of Regulation 2-5-302, which are screening levels of less than ten in a million and a hazard index of less than 1.0.

**Regulation 6, Rule 1**

Pursuant to Regulation 6-1-303 a person shall not emit, from an internal combustion engine with less than a 25-liter displacement, 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. The engine is expected to meet the requirements of Regulation 6-1-303.



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**Regulation 9, Rule 1**

The engine is 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).

Pursuant to Regulation 9-1-301, the ground level concentrations of SO<sub>2</sub> shall 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. Pursuant to Regulation 9-1-302, a person shall not emit from any source, a gas stream containing SO<sub>2</sub> in excess of 300 ppm (dry). Lastly, pursuant to Regulation 9-1-304, a person shall not burn any liquid fuel having a sulfur content in excess of 0.5% by weight. Compliance with Regulation 9-1 is expected due to the use of CARB low sulfur diesel fuel with a sulfur content of 0.0015% by weight.

**Regulation 9, Rule 8**

This rule limits the emissions of NO<sub>x</sub> and CO from stationary internal combustion engines with an output rated by the manufacturer at more than 50 brake horsepower. The engine is intended to operate at a specific site for more than one year and will be attached to a foundation at the site. Therefore the requirements of this rule apply. In addition, the engine will be used for emergency use and is defined as an emergency standby engine pursuant to Regulation 9-8-230.

According to Regulation 9-8-110.5, emergency standby engines are exempt from the requirements of Regulations 9-8-301 through 305, 9-8-501, and 9-8-503. However, emergency standby engines are subject to the requirements of Regulation 9-8-330. Pursuant to Regulation 9-8-330, the engine will be allowed to operate 50 hours per calendar year for reliability-related activities. The requirements of the CARB ATCM are equivalent to the allowed annual reliability-related activity hours of this rule.

In accordance with Regulation 9-8-530, the engine shall be equipped with a non-resettable totalizing meter that measures hours of operation or fuel usage. Monthly records for the following shall be kept for at least 2 years and be made available to District staff upon request.

- Total hours of operation;
- Emergency hours of operation; and,
- The nature of the emergency condition for each emergency.

The engine is expected to meet the aforementioned requirements.

**California Environmental Quality Act (CEQA) and Regulation 2-1**

Pursuant to Regulation 2-1-311, an application for a proposed new or modified source will be classified as ministerial and will accordingly be exempt from the CEQA requirement of Regulation 2-1-310 if the District's engineering evaluation and basis for approval or denial of the permit application for the project is limited to the criteria set forth in Regulation 2-1-428 and to the specific procedures, fixed standards, and objective measurements set forth in the District's Permit Handbook and BACT/TBACT Workbook. The application is considered to be ministerial and is not subject to CEQA review.

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**California Health & Safety Code §42301.6 and Regulation 2-1-412**

Pursuant to California Health & Safety Code §42301.6(a), prior to approving an application for a permit to construct or modification of a source, which is located within 1,000 feet from the outer boundary of a school site, the District shall prepare a public notice as detailed in §42301.6. §42301.9(a) defines a “school” as any public or private school used for the purposes of the education of more than 12 children in kindergarten or any grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in private homes.

The applicant has proposed to install the engine within 1,000 feet from the outer boundary of the following school site(s) identified in the following table.

<b>Table 9. School Sites Located Within 1,000 Feet of the Equipment</b>			
<b>School Name</b>	<b>School Location</b>	<b>Grades</b>	<b>Description</b>
Ronald C. Wornick Jewish Day School	800 Foster City Boulevard Foster City, CA 94404	K-8	Private
Bright Horizon Chinese School	650 Shell Boulevard Foster City, CA 94404	K-12	Heritage

The District will be required to prepare a public notice as detailed in §42301.6.

**PERMIT CONDITIONS**

**Permit Condition #22850**

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 CI Engines]
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: 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.

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- 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 CI 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 for Stationary CI Engines]

*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 source will be located within 1,000 feet of a school, which triggers the public notification requirement 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 the issuance of an Authority to Construct for the following source:

- S-1 Stationary Emergency Diesel Engine-Generator Set  
Make: Cummins; Model: QSL9-G7 NR3; Model Year: 2015  
464 BHp, 5.4 MMBtu/Hr**

By: \_\_\_\_\_  
Alfonso Borja  
Air Quality Engineer

Date: \_\_\_\_\_