

**DRAFT**  
**Engineering Evaluation**  
**County of Marin, Cardinal Road Pump Station**  
**Application No. 16814**  
**Plant No. 18732**

**BACKGROUND**

County of Marin, Cardinal Road Pump Station has applied for a Permit to Operate (PO) for the following equipment:

**S-1 Emergency Standby Generator Set: Natural Gas Engine  
 General Motors, Model: Vortec 8.1 L, Model Year: 2001  
 196 BHP, 1.39 MMBtu/hr**

Abated by

**A-1 Non-Selective Catalytic Converter (Nett Technologies T-G Series) with an air/fuel controller**

The equipment will be located at 228 Cardinal Road, Mill Valley, CA 94941.

The natural gas fired emergency standby generator set (S-1) will provide emergency standby power in the event of a disruption to power service. The natural gas fired engine is equipped with an air fuel ratio controller and a Catalytic Converter to reduce exhaust emissions of nitrogen oxides (NOx) and carbon monoxide (CO). These criteria pollutants are briefly discussed on the District's web site at [www.baaqmd.gov](http://www.baaqmd.gov).

The engine is subject to attached condition no. 23108.

**EMISSIONS CALCULATIONS**

The emission factors used to estimate criteria pollutant emissions from the natural gas fired engine generator set described above are based on engine manufacturer abated and unabated emissions data. Total Hydrocarbon emission rates were assumed to be equal to Precursor Organic Compound (POC) emission rates. The engine will operate during emergency use and for a maximum of 100 hours per year for maintenance and testing. See Table 1.

**Table 1**

<b>Pollutant</b>	<b>Unabated Emission Factor (g/BHP-hr)</b>	<b>Abated Efficiency (%)</b>	<b>Abated Emission Factor (g/BHP-hr)</b>	<b>Abated Emission (lb/day)</b>	<b>Abated Emission (lb/yr)</b>	<b>Abated Emission (TPY)</b>
NOx	5.40	97.8	0.130	1.3	5.6	0.003
POC	0.63	96.8	0.020	0.2	0.9	0.000
CO	32.00	98.0	0.460	4.8	19.9	0.010

**TOXIC RISK SCREENING ANALYSIS**

The emission factors used to estimate Hazardous Air Pollutants (HAPs) emissions from the engine described above are from: AP-42 for natural gas fired 4-cycle rich burn engine Table 3.2-3, or the California Air Toxics Emission Factor Database (maintained by the California Air Resources Board) for natural gas fired 4-cycle rich burn engines with less than 650 hp. The engine being permitted has a maximum firing rate of 1.539 MM Btu/hr and a maximum rating of 196 hp. The CATEF Emission Factors maintained by the ARB were used to estimate emissions for all compounds that have AP-42 emission factors and CATEF emission factors.

The HAP emission estimates are based on uncontrolled emission factors for natural gas engines and an assumed abatement efficiency of 50% removal of organic HAP compounds. The abatement efficiency is based on the fact that the engine is being permitted with a Catalytic Converter and an air fuel ratio controller.

As shown in Table 2 and Table 3 below, no toxic air contaminants exceed the District Risk Screening Triggers and a Risk Screening Analysis is not required.

(Note: According to the “Proposed BAAQMD Air Toxics NSR Program HRSA Guidelines”, an HRSA for the emissions of Acrolein will not be conducted.)

**Table 2**  
**HAP EMISSIONS ESTIMATES BASED ON AP-42 TABLE 3.2-3 (FOR COMPOUNDS WITH NO CATEF E.F.)**

Compound		E.F.	Unit	Assumed Abatement Efficiency %	Abated Emissions (lb/hr)	Acute Trigger Level (lb/hr)	HRSA Triggered? (Y/N)	Abated Emissions (lb/yr)	Chronic Trigger Level (lb/yr)	HRSA Triggered? (Y/N)
1,1,2,2-Tetrachloroethane		2.53E-05	lb/MMBtu	50	1.76E-05	None	NO	1.76E-03	3.20E+00	NO
1,1,2-Trichloroethane	<	1.53E-05	lb/MMBtu	50	1.07E-05	None	NO	1.07E-03	1.10E+01	NO
1,1-Dichloroethane	<	1.13E-05	lb/MMBtu	50	7.88E-06	None	NO	7.88E-04	1.10E+02	NO
1,2-Dichloroethane	<	1.13E-05	lb/MMBtu	50	7.88E-06	None	NO	7.88E-04	None	NO
1,2-Dichloropropane	<	1.30E-05	lb/MMBtu	50	9.06E-06	None	NO	9.06E-04	None	NO
1,3-Butadiene		6.63E-04	lb/MMBtu	50	CATEF	None	NO	CATEF	1.10E+00	NO
1,3-Dichloropropene	<	1.27E-05	lb/MMBtu	50	8.85E-06	None	NO	8.85E-04	None	NO
Acetaldehyde		2.79E-03	lb/MMBtu	50	CATEF	None	NO	CATEF	6.40E+01	NO
Acrolein		2.63E-03	lb/MMBtu	50	CATEF	4.2E-04	NO	CATEF	2.30E+00	NO
Benzene		1.58E-03	lb/MMBtu	50	CATEF	2.9E+00	NO	CATEF	6.40E+00	NO
Butyr/isobutyraldehyde		4.86E-05	lb/MMBtu	50	3.39E-05	None	NO	3.39E-03	None	NO
Carbon Tetrachloride	<	1.77E-05	lb/MMBtu	50	1.23E-05	4.2E+00	NO	1.23E-03	4.30E+00	NO
Chlorobenzene	<	1.29E-05	lb/MMBtu	50	8.99E-06	None	NO	8.99E-04	3.90E+04	NO
Chloroform	<	1.37E-05	lb/MMBtu	50	9.55E-06	3.3E-01	NO	9.55E-04	3.40E+01	NO
Ethane		7.04E-02	lb/MMBtu	50	4.91E-02	None	NO	4.91E+00	None	NO
Ethylbenzene	<	2.48E-05	lb/MMBtu	50	CATEF	None	NO	CATEF	7.70E+04	NO
Ethylene Dibromide	<	2.13E-05	lb/MMBtu	50	1.48E-05	None	NO	1.48E-03	2.60E+00	NO
Formaldehyde		2.05E-02	lb/MMBtu	50	CATEF	2.1E-01	NO	CATEF	3.00E+01	NO
Methanol		3.06E-03	lb/MMBtu	50	2.13E-03	6.2E+01	NO	2.13E-01	1.50E+05	NO
Methylene Chloride		4.12E-05	lb/MMBtu	50	2.87E-05	3.1E+01	NO	2.87E-03	1.80E+02	NO
Naphthalene	<	9.71E-05	lb/MMBtu	50	CATEF	None	NO	CATEF	None	NO
PAH		1.41E-04	lb/MMBtu	50	CATEF	None	NO	CATEF	None	NO
Styrene	<	1.19E-05	lb/MMBtu	50	8.29E-06	4.6E+01	NO	8.29E-04	3.50E+04	NO
Toluene		5.58E-04	lb/MMBtu	50	3.89E-04	8.2E+01	NO	3.89E-02	1.20E+04	NO
Vinyl Chloride	<	7.18E-06	lb/MMBtu	50	5.00E-06	4.0E+02	NO	5.00E-04	2.40E+00	NO
Xylene		1.95E-04	lb/MMBtu	50	1.36E-04	4.9E+01	NO	1.36E-02	2.70E+04	NO

**Table 3  
HAP EMISSION ESTIMATES BASED ON CATEF EMISSION FACTORS**

SUBSTANCE	E.F. MEAN	UNIT	Assumed Abatement Efficiency %	Abated Emissions (lb/hr)	Acute Trigger Level (lb/hr)	HRSA Triggered? (Y/N)	Abated Emissions (lb/yr)	Chronic Trigger Level (lb/yr)	HRSA Triggered? (Y/N)
1,3-Butadiene	1.04E-01	lbs/MMcf	50	8.05E-05	None	NO	8.05E-03	1.10E+00	NO
Acenaphthene	1.94E-03	lbs/MMcf	50	1.50E-06	None	NO	1.50E-04	None	NO
Acenaphthylene	1.45E-02	lbs/MMcf	50	1.12E-05	None	NO	1.12E-03	None	NO
Acetaldehyde	8.83E-01	lbs/MMcf	50	6.84E-04	None	NO	6.84E-02	6.40E+01	NO
Acrolein	5.47E-01	lbs/MMcf	50	4.24E-04	4.20E-04	YES	4.24E-02	2.30E+00	NO
Anthracene	1.84E-03	lbs/MMcf	50	1.43E-06	None	NO	1.43E-04	None	NO
Benzene	1.91E+00	lbs/MMcf	50	1.48E-03	2.90E+00	NO	1.48E-01	6.40E+00	NO
Benzo(a)anthracene	2.94E-04	lbs/MMcf	50	2.28E-07	None	NO	2.28E-05	None	NO
Benzo(a)pyrene	1.15E-04	lbs/MMcf	50	8.91E-08	None	NO	8.91E-06	1.10E-02	NO
Benzo(b)fluoranthene	2.37E-04	lbs/MMcf	50	1.84E-07	None	NO	1.84E-05	None	NO
Benzo(g,h,i)perylene	1.95E-04	lbs/MMcf	50	1.51E-07	None	NO	1.51E-05	None	NO
Benzo(k)fluoranthene	1.03E-04	lbs/MMcf	50	7.98E-08	None	NO	7.98E-06	None	NO
Chrysene	3.10E-04	lbs/MMcf	50	2.40E-07	None	NO	2.40E-05	None	NO
Dibenz(a,h)anthracene	1.25E-05	lbs/MMcf	50	9.68E-09	None	NO	9.68E-07	None	NO
Ethylbenzene	1.16E-02	lbs/MMcf	50	8.98E-06	None	NO	8.98E-04	7.70E+04	NO
Fluoranthene	9.95E-04	lbs/MMcf	50	7.71E-07	None	NO	7.71E-05	None	NO
Fluorene	6.91E-03	lbs/MMcf	50	5.35E-06	5.30E-01	NO	5.35E-04	5.00E+02	NO
Formaldehyde	2.35E+00	lbs/MMcf	50	1.82E-03	2.1E-01	NO	1.82E-01	3.00E+01	NO
Indeno(1,2,3-cd)pyrene	1.69E-04	lbs/MMcf	50	1.31E-07	None	NO	1.31E-05	None	NO
Naphthalene	7.65E-02	lbs/MMcf	50	5.92E-05	None	NO	5.92E-03	None	NO
Phenanthrene	7.07E-03	lbs/MMcf	50	5.48E-06	None	NO	5.48E-04	None	NO
Propylene	1.60E+01	lbs/MMcf	50	1.24E-02	None	NO	1.24E+00	1.20E+05	NO
Pyrene	1.79E-03	lbs/MMcf	50	1.39E-06	None	NO	1.39E-04	None	NO
Toluene	1.07E+00	lbs/MMcf	50	8.29E-04	8.2E+01	NO	8.29E-02	1.20E+04	NO
Xylene (m,p)	4.41E-01	lbs/MMcf	50	3.42E-04	4.9E+01	NO	3.42E-02	2.70E+04	NO
Xylene (o)	2.17E-01	lbs/MMcf	50	1.68E-04	4.9E+01	NO	1.68E-02	2.70E+04	NO
Xylene (Total)	6.02E-02	lbs/MMcf	50	4.66E-05	4.9E+01	NO	4.66E-03	2.70E+04	NO
PAH Equivalents as Benzo(a)pyrene								1.10E-02	NO

### PLANT CUMULATIVE EMISSIONS

County of Marin, Cardinal Road Pump Station at “228 Cardinal Road., Mill Valley, CA 94941” is a new facility. Therefore, the District’s database does not contain information on existing emissions at the plant. Table 4 summarizes the cumulative increase in criteria pollutant emissions that will result at Plant 18732 from the operation of S-1.

**Table 4**

<b>Plant Cumulative Increase: (tons/year)</b>			
<b>Pollutant</b>	<b>Existing</b>	<b>New</b>	<b>Total</b>
POC	0.000	0.000	0.000
NO <sub>x</sub>	0.000	0.003	0.003
CO	0.000	0.010	0.010
PM <sub>10</sub>	0.000	0.000	0.000

**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>.

Based on the emission calculations above, BACT is not triggered for any pollutant since the maximum daily emission of the each pollutant does not exceed 10 lb/day. Since the low emissions level is dependent on usage of the abatement device, a condition has been added requiring its use.

**OFFSETS**

Per Regulation 2-2-302, 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>. Based on the emission calculations above, offsets are not required for this application.

**STATEMENT OF COMPLIANCE**

The owner/operator of S-1 shall comply with Regulation 6 (*Particulate Matter and Visible Emissions Standards*) and Regulation 9-1-301 (*Inorganic Gaseous Pollutants: Sulfur Dioxide for Limitations on Ground Level Concentrations*). 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.

S-1 is an emergency standby generator; from Regulation 9, Rule 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*).

Allowable operating hours and the corresponding record keeping in Regulations 9-8-330 (*Emergency Standby Engines, Hours of Operation*) and 530 (*Emergency Standby Engines, Monitoring and Recordkeeping*) will be included in the Permit Conditions below.

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)

This facility is located less than 1,000 feet from the nearest school and therefore is subject to the public notification requirements of Regulation 2-1-412. A public notice was prepared and sent to all addresses within 1000 feet of the diesel generator set and parents and guardians of students of the following schools:

Tamalpais Valley Elementary School

350 Bell Lane  
Mill Valley, CA 94941

Real School LLC

205 Tennessee Valley Road  
Mill Valley, CA 94941

**PSD, NSPS, and NESHAPS do not apply.**

**PERMIT CONDITIONS**

COND# 23108 -----

1. The owner or operator shall operate the stationary emergency standby engine, only to mitigate emergency conditions or for reliability-related activities (maintenance and testing). Operating while mitigating emergency conditions and while emission testing to show compliance with this part is unlimited. Operating for reliability-related activities are limited to 100 hours per year.  
(Basis: Emergency Standby Engines, Hours of Operation Regulation 9-8-330)
2. The Owner/Operator shall equip the emergency standby engine(s) with: a non-resettable totalizing meter that measures hours of operation or fuel usage.  
(Basis: Emergency Standby Engines, Monitoring and Recordkeeping 9-8-530)
3. The Owner/Operator shall not operate unless the natural gas fired engine is abated with a Catalytic Converter/Silencer Unit
4. Records: The Owner/Operator shall maintain the following monthly records in a District- approved log for at least 24 months from the date of entry. 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 (maintenance and testing).
  - b. Hours of operation for emission testing.
  - c. Hours of operation (emergency).
  - d. For each emergency, the nature of the emergency condition.
  - e. Fuel usage for engine.
  - f. CARB Certification Executive Order for the engine.  
(Basis: Emergency Standby Engines, Monitoring and RECORDKEEPING 9-8-530)

**RECOMMENDATION**

Issue a Permit to Operate (PO) to County of Marin, Cardinal Road Pump Station for:

**S-1 Emergency Standby Generator Set: Natural Gas Engine  
General Motors, Model: Vortec 8.1 L, Model Year: 2001  
196 BHP, 1.39 MMBtu/hr**

Abated by

**A-1 Non-Selective Catalytic Converter (Nett Technologies T-G Series) with an air/fuel controller**

By: \_\_\_\_\_

Lucy Croy  
Air Quality Engineering Intern  
DATE: 8/21/09