

ENGINEERING EVALUATION-draft

Facility ID No. 24280
John Freund
86 Alejandra Ave., Atherton, CA 94027
Application No. 29590

Background

Bayside Equipment Company has applied to obtain an Authority to Construct and/or a Permit to Operate on behalf of John Freund for the following equipment:

S-1 Emergency Standby Generator Set: Natural Gas Engine
Make: Kohler, Model: 60RCL, Model Year: 2018
105 bhp, 0.83 MMBtu/hr
Permit Condition No. 23107
Abated by

A-1 Nett Technologies Inc. TG-Series Catalytic Converter

The engine will be located at 86 Alejandra Avenue, Atherton, CA 94027. The primary emissions from S-1 include nitrogen oxides (NO_x), carbon monoxide (CO), precursor organic compounds (POC) from combustion of natural gas. Toxic air contaminants (TAC) including benzene, formaldehyde, and toluene are also emitted during combustion of natural gas. S-1 is abated by a 3-way catalytic converter A-1, which reduces NO_x, CO, and POC emissions through nonselective catalytic reduction.

Emissions

Basis:

- 105 hp output rating
- Operating 50 hours per year
- Operating 24 hours maximum per day
- Maximum fuel usage of 0.83 MMBtu/hr
- Natural Gas energy content of 1050 btu/scf was assumed.
- The manufacturer states the abatement efficiency for the catalytic convertor is 97% for NO_x, 94% for CO and 97% for POC. These abatement efficiencies were applied to the emission factors.

The emission factors used to estimate NO_x, POC, and CO emissions from the natural gas engine generator set described above are provided by the engine manufacturer. PM₁₀ and SO₂ emission factors are based on AP-42, Fifth Edition, Volume I Chapter 3: Stationary Internal Combustion Sources; Section 3.2 Natural Gas Fired Reciprocating Engines; Table 3.2-3 Uncontrolled Emission Factors for 4-Stroke Rich Burn Engines. The daily maximum emissions were calculated assuming 24-hr/day of operation. The emissions from S-1 are summarized in Table 1.

Table 1 - Annual and Daily Emissions for S-1

Pollutant	Abated E.F.	E.F. Unit	Abatement Efficiency (%)	Max Daily Emissions -Abated (lbs/day)	Abated Annual Emissions (lbs/yr)	Abated Annual Emissions (TPY)
NO _x	1.70E-01 ^{a,b}	g/bhp-hr	97%	0.95	1.97	0.001
POC	2.00E-03 ^{a,b}	g/bhp-hr	97%	0.01	0.03	0.000
CO	1.20E+00 ^a	g/bhp-hr	94%	6.64	13.84	0.007
PM ₁₀	1.94E-02 ^c	lb/MMBtu	N/A	0.39	0.80	0.000
PM _{2.5}	1.94E-02 ^c	lb/MMBtu	N/A	0.39	0.80	0.000
SO ₂	5.88E-04 ^c	lb/MMBtu	N/A	0.01	0.02	0.000

^a The emission factors for NO_x, CO, and POC were provided by the manufacturer.

^b Since the manufacturer provided a combined emission factor as HC+NO_x, approximate breakdown of 1.32% and 98.68% was assumed for POC and NO_x, respectively, based on POC and NO_x emission factor from AP-42 Chapter 3.2 Natural Gas-fired Reciprocating Engines, Table 3.2-3.

^c The emission factors for PM and SO₂ was retrieved from AP-42 Chapter 3.2 Natural Gas-fired Reciprocating Engines, Table 3.2-3. PM_{2.5} was assumed to equal PM₁₀.

Cumulative Increase

Table 2 summarizes the cumulative increase in criteria pollutant emissions that will result from this application.

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

Pollutant	Existing Emissions Post 4/5/91 (tons/yr)	Application Emissions (tons/yr)	Cumulative Emissions (tons/yr)
NO _x	0.000	0.001	0.001
POC	0.000	0.000	0.000
CO	0.000	0.007	0.007
PM ₁₀	0.000	0.000	0.000
PM _{2.5}	0.000	0.000	0.000
SO ₂	0.000	0.000	0.000

Health Risk Assessment (HRA)

The Toxic Air Contaminants (TACs) emission factors used to estimate emissions are from either AP-42, Table 3.2-3 “Uncontrolled Emission Factors for 4-Stroke Rich-Burn Engines” or the California Air Toxics Emission Factor Database (maintained by the California Air Resources Board) for natural gas fired 4-cycle rich burn engines.

The TAC emission estimates are based on uncontrolled emission factors for natural gas engines and an assumed abatement efficiency of 50% removal of organic TAC

compounds, except for the pollutants which have abated emission factors in CATEF (benzene and formaldehyde).

As shown in Table 3, no TACs exceed the District's Risk Screening trigger levels set forth in Table 1 of Reg. 2-5 (New Source Review for Toxic Air Contaminants). Therefore, a Health Risk Assessment (HRA) is not required.

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Table 3: TAC Emission Estimates Based on CATEF or AP-42 Table 3.2-3

	Emission Factor	Assumed Abatement Efficiency	Abated Emissions	Acute Trigger Level	HRA Triggered?	Abated Emissions	Chronic Trigger Level	HRA Triggered?
	lbs/MMscf	%	lb/hr	lb/hr	YES/ -	lb/yr	lb/yr	YES/ -
1,1,2,2-Tetrachloroethane	2.66E-02	50	1.05E-05	-	-	5.25E-04	1.40E+00	-
1,1,2-Trichloroethane	1.61E-02	50	6.35E-06	-	-	3.17E-04	5.00E+00	-
1,1-Dichloroethane	1.19E-02	50	4.69E-06	-	-	2.34E-04	5.00E+01	-
1,2-Dichloroethane	1.19E-02	50	4.69E-06	-	-	2.34E-04	4.00E+00	-
1,2-Dichloropropane	1.37E-02	50	5.39E-06	-	-	2.70E-04	-	-
1,3-Butadiene	1.05E-01	50	4.13E-05	1.50E+00	-	2.07E-03	4.80E-01	-
1,3-Dichloropropene	1.33E-02	50	5.27E-06	-	-	2.63E-04	-	-
Acenaphthene	3.39E-03	50	1.34E-06	-	-	6.69E-05	-	-
Acenaphthylene	1.62E-02	50	6.39E-06	-	-	3.20E-04	-	-
Acetaldehyde	1.82E+00	50	7.20E-04	1.00E+00	-	3.60E-02	2.90E+01	-
Acrolein	1.37E+00	50	5.42E-04	5.50E-03	-	2.71E-02	1.40E+01	-
Anthracene	2.26E-03	50	8.92E-07	-	-	4.46E-05	-	-
Benzene	1.02E+01	0	8.07E-03	6.00E-02	-	4.04E-01	2.90E+00	-
Benzo(g,h,i)perylene	2.45E-04	50	9.67E-08	-	-	4.83E-06	-	-
Butyr/isobutyraldehyde	5.10E-02	50	2.02E-05	-	-	1.01E-03	-	-
Carbon Tetrachloride	1.86E-02	50	7.34E-06	4.20E+00	-	3.67E-04	1.90E+00	-
Chlorobenzene	1.35E-02	50	5.35E-06	-	-	2.68E-04	3.90E+04	-
Chloroform	1.44E-02	50	5.68E-06	3.30E-01	-	2.84E-04	1.50E+01	-
Ethane	7.39E+01	50	2.92E-02	-	-	1.46E+00	-	-
Ethylbenzene	1.44E-02	50	5.67E-06	-	-	2.84E-04	2.90E+00	-
Ethylene Dibromide	2.24E-02	50	8.83E-06	-	-	4.42E-04	1.10E+00	-
Fluoranthene	1.20E-03	50	4.76E-07	-	-	2.38E-05	-	-
Fluorene	9.04E-03	50	3.57E-06	-	-	1.78E-04	-	-
Formaldehyde	1.14E+01	0	9.01E-03	1.20E-01	-	4.50E-01	1.40E+01	-
Methanol	3.21E+00	50	1.27E-03	6.20E+01	-	6.35E-02	1.50E+05	-
Methylene Chloride	4.33E-02	50	1.71E-05	3.10E+01	-	8.54E-04	8.20E+01	-
Naphthalene	8.66E-02	50	3.42E-05	-	-	1.71E-03	2.40E+00	-
PAH (CATEF)	2.66E-04	50	1.05E-07	-	-	5.26E-06	3.30E-03	-
Phenanthrene	8.85E-03	50	3.49E-06	-	-	1.75E-04	-	-
Propylene	4.20E+01	50	1.66E-02	-	-	8.30E-01	1.20E+05	-
Pyrene	2.64E-03	50	1.04E-06	-	-	5.21E-05	-	-
Styrene	1.25E-02	50	4.94E-06	4.60E+01	-	2.47E-04	3.50E+04	-
Toluene	2.62E+00	50	1.04E-03	8.20E+01	-	5.18E-02	1.20E+04	-
Vinyl Chloride	7.54E-03	50	2.98E-06	4.00E+02	-	1.49E-04	1.10E+00	-
Xylene	7.38E-02	50	2.92E-05	4.90E+01	-	1.46E-03	2.70E+04	-
Xylene (m,p)	4.54E-01	50	1.79E-04	4.90E+01	-	8.96E-03	2.70E+04	-
Xylene (o)	2.22E-01	50	8.76E-05	4.90E+01	-	4.38E-03	2.70E+04	-

Best Available Control Technology (BACT)

Per Regulation 2-2-301, any new source is required to use Best Available Control Technology (BACT) to control emissions of any District BACT pollutants [precursor organic compounds (POC), non-precursor organic compounds (NPOC), oxides of nitrogen (NO_x), sulfur dioxide (SO₂), PM₁₀, PM_{2.5}, and/or carbon monoxide (CO)] that have the potential to emit 10 or more pounds on any day.

Based on the emission calculations above, BACT is not triggered.

Offsets

Offsets must be provided for any new or modified source at a facility that emits more than 10 tons per year of POC or NO_x as specified in Regulation 2-2-302; and more than 100 tons per year of PM₂₅, PM₁₀, and SO₂ as specified in Regulation 2-2-303. Based on the emission calculations in Table 1, offsets are not required for this application

Statement of Compliance

The owner/operator of S-1 shall comply with Regulation 6-1 (Particulate Matter and Visible Emissions Standards), Regulation 9-1-301 (Inorganic Gaseous Pollutants: Sulfur Dioxide), and Regulation 9-8 (Inorganic Gaseous Pollutants: Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines).

The owner/operator is subject to Regulation 6-1-303 since S-1 has a displacement of 350 in³. Thus, for any period aggregating more than three minutes in any hour, there should be no visible emission as dark or darker than No. 2 on the Ringelmann Chart and no visible emission to exceed 40% opacity. The engine is expected to meet this requirement with regular maintenance and inspection. S-1 will emit a very small amount of PM₁₀, it is not expected to produce visible emissions and will be assumed to be in compliance with Regulation 6-1-305. The emission rate from S-1 is 0.07 grams/bhp-hr of Total Suspended Particulate (TSP), which results in an outlet grain loading of 0.015 grains/dscf at 0% O₂. The emission rate is less than the limit 0.15 grains/dscf and is in compliance with Regulation 6-1-310.

Regulation 9-1-301 (Limitations on Ground Level Concentrations) prohibits emissions from any sources other than ships, SO₂ in quantities which result in ground level concentrations in excess of 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. Natural Gas will be used to meet the sulfur limitation of 0.5 wt% in Regulation 9-1-304 (Fuel Burning) as well as to minimize SO₂ emissions to comply with Regulation 9-1-301. Thus, S-1 is expected to comply with Regulation 9-1.

Based on Regulation 9-8-110.5 (Exemptions for Emergency Standby Engines), S-1 is exempt from the requirements of Sections 9-8-301 through 305, 501 and 503. However,

S-1 is subject to the monitoring and record keeping procedures described in Regulation 9-8-530 (Emergency Standby and Low Usage Engines, Monitoring and Recordkeeping) and Regulation 9-8-502 (Recordkeeping). The requirements of this Regulation are included in the permit conditions. 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 calendar year.

Thus, S-1 is expected to comply with Regulation 9-8.

California Environmental Quality Act (CEQA)

This project is considered to be ministerial under the District Regulation 2-1-311 (Permit Handbook Chapter 2.3.2) and is therefore not subject to CEQA review.

New Source Performance Standards (NSPS)

40 CFR 60, Subpart JJJJ (*Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*)

S-1 is subject to 40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICEs), Section 60.4230(a)(4)(iv) because the engine is an emergency engine which is manufactured on or after January 1, 2009 and has a maximum engine power greater than 19 kW (25 hp).

Section 60.4233(e) requires that owners and operators of stationary spark ignition internal combustion engines with a maximum engine power greater than or equal to 75 kW (100 hp) (except gasoline and rich burn engines that use LPG) must comply with following emission standards:

NO_x+HC: 10 g/bhp-hr
CO: 387 g/bhp-hr
VOC: N/A

Based on the exhaust emissions provided by the engine manufacturer, S-1 complies with the emission standards set forth in 40 CFR 60, Subpart JJJJ.

National Emissions Standards for Hazardous Air Pollutants (NESHAP)

S-1 is subject to 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). 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 JJJJ, for spark ignition engines. As stated above in the NSPS section, S-1 is in compliance with the requirements of 40 CFR part 60 subpart JJJJ,

Prevention of Significant Deterioration (PSD)

Regulation 2-2-224 defines a PSD project as one at a facility that has the potential to emit 100 tons or more per year of any PSD pollutant. This facility will not have the potential to emit 100 tons or more of any PSD pollutant therefore, this project is not a PSD project.

School Notification (Regulation 2-1-412)

This facility is within 1,000 feet from the nearest school and therefore is subject to the public notification requirements of Regulation 2-1-412.

Permit Conditions

Permit Condition 23107 for S-1

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 50 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 Record keeping 9-8-530)

3. The Owner/Operator shall not operate unless the natural gas fired engine is abated with a Catalytic Converter.

(Basis: Cumulative Increase)

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 or operating hours for engine.

(Basis: Emergency Standby Engines, Monitoring and Recordkeeping 9-8-530)

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 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:

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Make: Kohler, Model: 60RCL, Model Year: 2018
105 bhp, 0.83 MMBtu/hr
Permit Condition No. 23107
Abated by

A-1 Nett Technologies Inc, TG-Series Catalytic Converter

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