

DRAFT ENGINEERING EVALUATION

Facility ID No. 24337
Vornado Realty Trust
345 Montgomery Street, San Francisco, CA 94104
Application No. 29753

Background

Vornado Realty Trust is applying for an Authority to Construct for the following equipment:

S-1 Emergency Standby Diesel Generator Set
Make: Cummins: Model: QSX15-G9, Model Year: 2018
755 bhp, 5.62 MMBtu/hr
Permit Condition No. 22850

Abated by

A-1 Johnson Matthey, CRT(+)-3-N-BISCO-CS-10-LP Diesel Particulate Filter

The criteria pollutants are nitrogen oxides (NO_x), carbon monoxide (CO), precursor organic compounds (POC) from unburned diesel fuel, sulfur dioxide (SO₂) and particulate matter (PM₁₀). All of these pollutants are briefly discussed on the District's web site at www.baaqmd.gov.

S-1 meets the Environmental Protection Agency and California Air Resources Board (EPA/CARB) Tier 2 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.

This evaluation report will discuss compliance of the proposed project with all applicable rules and regulations.

Emissions

Table 1. Annual and Daily Emissions from Manufacturer's Data from S-1

Pollutant	Emission Factor (g/bhp-hr)	Abatement Efficiency 85% Reduction	Max Daily Emissions (lb/day)	Annual Emissions (lb/yr)	Annual Emissions (tons/yr)
NO _x	3.70		147.50	307.29	0.154
POC	0.20		7.77	16.19	0.008
CO	0.40		15.95	33.22	0.017
PM ₁₀ /PM _{2.5} ¹	0.08	0.012 ³	0.48	1.00	0.000
SO ₂	N/A ²		0.22	0.46	0.000

Basis:

- Annual emissions: Reliability-related activity 50 hours for S-1
- Max daily emissions: 24-hour operation
- Emissions from Manufacturer's Emission Data for S-1
- ¹ Conservative Assumption: All PM emissions are PM2.5
- ² SO₂ emission factor from AP-42 Table 3.4-1, SO₂ (15 ppm) = 0.00809*0.0015 lb SO₂/bhp-hr
- ³Executive Order DE-08-009-09

Plant Cumulative Increase

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

Table 2. Plant 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	0.154	0.154
POC	0.000	0.008	0.008
CO	0.000	0.017	0.017
PM ₁₀ /PM _{2.5}	0.000	0.000	0.000
SO ₂	0.000	0.000	0.000

Health Risk Assessment (HRA)

HRA was required. The diesel particulate emissions from the project are greater than the toxic trigger level of 0.26 lb/year. The assessment estimates the incremental health risk resulting from toxic air contaminant (TAC) emissions from non-emergency operation of a standby generator diesel engine at this facility. Results from the HRA indicate the maximum project cancer risk is estimated at 0.15 in a million, and the maximum project chronic hazard index is estimated at 0.000047. In accordance with the District's Regulation 2, Rule 5, the source complies with the TBACT and project risk requirements.

All PM₁₀ emissions are considered diesel particulate emissions. The PM₁₀ emissions from this application are summarized in Table 1. There were no other related projects permitted in the last three years.

The project is in compliance with project risk requirements as recommended, limiting reliability-related activity hours by permit condition. See HRA report.

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, NOx, CO, SO2, or PM10.

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 NOx, CO, POC and PM10, BACT(2) is the CARB ATCM standard for the respective pollutant at the applicable horsepower rating. For SO2, BACT(2) is using fuel with sulfur content not to exceed 0.0015%, or 15 ppm. The more restrictive BACT(1) standards are not applicable to this engine because it will be limited to operation as an emergency standby engine.

S-1 satisfies the current BACT(2) standards for the following pollutants which exceed 10 lb/day in Table 1:

Pollutant	Emission Factor	BACT(2) Standard
NOx	3.70 g/bhp-hr	4.56 g/bhp-hr
CO	0.40 g/bhp-hr	2.60 g/bhp-hr

Offsets

Since the facility permitted levels are below the offset trigger levels specified in Regulation 2-2, offsets are not required.

Statement of Compliance

The owner/operator is expected to comply with all applicable requirements. Key requirements are listed below:

Airborne Toxic Control Measure for Stationary Compression Ignition Engines
ATCM, 5/19/2011, section 93115, title 17, CA Code of Regulations

District Rules

- Regulation 6-1-303 (*Ringelmann No. 2 Limitation*)
- Regulation 9-1-301 (*Limitations on Ground Level Concentrations of SO2*)
- Regulation 9-8 (*NOx and CO from Stationary Internal Combustion Engines*)
 - Section 9-8-110.5 – Limited exemption for emergency standby engines
 - Section 9-8-330 – Hours of operation for emergency standby engines
 - Section 9-8-502 – Recordkeeping

California Environmental Quality Act (CEQA)

This project is ministerial under the District Regulation 2-1-311 (Permit Handbook Chapter 2.3), and is therefore not subject to CEQA review.

New Source Performance Standards (NSPS)

40 CFR 60, Subpart IIII (*Stationary Compression Ignition Internal Combustion Engines*)

National Emissions Standards for Hazardous Air Pollutants (NESHAP)

40 CFR 63, Subpart ZZZZ (*Stationary Reciprocating Internal Combustion Engines (RICE)*)

Prevention of Significant Deterioration (PSD)

This application is not part of a PSD project as defined in Regulation 2-2.

School Notification (Regulation 2-1-412)

Because this equipment will be located within 1,000 feet of Edwin and Anita Lee Newcomer School, the project is subject to the public notification requirements of Regulation 2-1-412 due to the increase in emissions from the project. Ecole Norte Des Victoires and Stern School are also within ¼ mile of the equipment.

A public notice will be sent to all parents of students of the above mentioned school(s) and all residents within 1,000 feet of the facility. There will be a 30-day public comment period.

Permit Conditions

Permit Condition #22850 for S-1

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 hours 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)]

Permit Condition 26950 for S-1

1. The owner/operator shall abate the particulate emissions from the emergency diesel engine by the Diesel Oxidation Catalyst at all times the engine is in operation. [Basis: Toxics]
2. The owner/operator shall comply with requirement for CARB Executive Order DE- [Basis: CARB Executive Order DE-08-009-09]

End of Conditions

DRAFT

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/Permit to Operate for the equipment listed below. However, the proposed source will be located within 1,000 feet of at least one 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/Permit to Operate for the following source:

S-1 Emergency Standby Diesel Generator Set
Make: Cummins: Model: QSX15-G9, Model Year: 2018
755 bhp, 5.62 MMBtu/hr
Permit Condition No. 22850

Abated by

A-1 Johnson Matthey, CRT(+)-3-N-BISCO-CS-10-LP Diesel Particulate Filter

Prepared by: Sheryl Wallace, Air Quality Permit Technician