

**DRAFT Engineering Evaluation  
Marin Community Clinics  
Application No. 30982 / Plant No. 24898  
6090 Redwood Boulevard  
Novato, CA 94945**

**BACKGROUND**

Marin Community Clinics has applied for an Authority to Construct (AC) for the following equipment:

- S-1 Emergency Standby Natural Gas (NG) Engine  
PSI, Model: Industrial 8.8LT, Model Year: 2020  
259 BHP, 2.00 MMBtu/hr, Equipped with Integral Three-way Catalyst (TWC)**

**EMISSIONS CALCULATIONS**

Manufacturer emission factors (tested with equipped TWC) will be used for NO<sub>x</sub>, POC, and CO emissions. PM<sub>10</sub> and SO<sub>2</sub> emission factors are based on AP 42, Fifth Edition, Volume I, Chapter 3: Stationary Internal Combustion Sources; Section 2.4.1 Control Techniques for 4-Cycle Rich-burn Engines.<sup>1</sup> The engine will operate during emergency use and for a maximum of 50 hours per year for maintenance and testing.

**Table 1-Estimated Emissions From S-1**

<b>Pollutant</b>	<b>Emission Factor (g/BHP-hr)</b>	<b>Emission (lb/hr)</b>	<b>Emission (lb/yr)</b>	<b>Emission (TPY)</b>	<b>Maximum Daily Emissions (lb/day)</b>
NO <sub>x</sub>	0.075	0.043	2.15	0.001	1.03
POC	0.001	0.000	0.02	0.000	0.01
CO	0.216	0.123	6.15	0.003	2.95
PM <sub>10</sub>	0.033	0.020	0.95	0.000	0.46
SO <sub>2</sub>	0.002	0.001	0.06	0.000	0.03

Basis:

259 bhp Max Rated Output

1965 cf/hr Max fuel use Rate = 2.00 MMBTU/hr

NO<sub>x</sub>, POC and CO emission factors are from the engine manufacturer.

The PM and SO<sub>2</sub> emission factors are from EPA AP-42, Table 3.2-3 for 4 stroke Rich-burn Engines

Annual Emissions are based on the Annual Limit (50 hr/yr) of operation for testing and maintenance

Max daily emissions are based on 24 hr/day since no daily limits are imposed on emergency operations

NO<sub>x</sub> emission factor is assumed to be 99% of NO<sub>x</sub>+POC emission factor (0.076 g/bhp-hr)

<sup>1</sup> SO<sub>2</sub> Emission Factor = 5.88 E-04 Lb./MMBTu; calculations assume 100% of fuel sulfur conversion with the content in natural gas = 2000 gr/10<sup>6</sup>scf. PM<sub>10</sub> Fuel input Emission Factor = 9.50E-03 Lb./MMBTu; aerodynamic particle diameter = < 1 μm, for the purposes of filterable emissions PM<sub>10</sub>= PM<sub>2.5</sub>. These emissions are expected to be negligible but included for completeness.

## 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 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, except for the pollutants which have abated emission factors in CATEF. The abatement efficiency is based on the fact that the engine is being permitted with a Catalytic Converter and an air fuel ratio controller. The actual abatement efficiency of the engine is expected to be much higher but using a more conservative estimate of 50% which is the default factors used for other natural gas engines was selected as a worst-case scenario.

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.

**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	2.54E-05	None	No	1.27E-03	1.40E+00	No
1,1,2-Trichloroethane	< 1.53E-05	lb/MMBtu	50	1.53E-05	None	No	7.67E-04	5.00E+00	No
1,1-Dichloroethane	< 1.13E-05	lb/MMBtu	50	1.13E-05	None	No	5.66E-04	5.00E+01	No
1,2-Dichloroethane	< 1.13E-05	lb/MMBtu	50	1.13E-05	None	No	5.66E-04	None	No
1,2-Dichloropropane	< 1.30E-05	lb/MMBtu	50	1.30E-05	None	No	6.51E-04	None	No
1,3-Butadiene	6.63E-04	lb/MMBtu	50	CATEF	None	No	CATEF	4.80E-01	No
1,3-Dichloropropene	< 1.27E-05	lb/MMBtu	50	1.27E-05	None	No	6.36E-04	None	No
Acetaldehyde	2.79E-03	lb/MMBtu	50	CATEF	1.00E+00	No	CATEF	2.90E+01	No
Acrolein	2.63E-03	lb/MMBtu	50	CATEF	5.50E-03	No	CATEF	1.40E+01	No
Benzene	1.58E-03	lb/MMBtu	50	CATEF	6.00E-02	No	CATEF	2.90E+00	No
Butyr/isobutyraldehyde	4.86E-05	lb/MMBtu	50	4.87E-05	None	No	2.44E-03	None	No
Carbon Tetrachloride	< 1.77E-05	lb/MMBtu	50	1.77E-05	4.20E+00	No	8.87E-04	1.90E+00	No
Chlorobenzene	< 1.29E-05	lb/MMBtu	50	1.29E-05	None	No	6.46E-04	3.90E+04	No
Chloroform	< 1.37E-05	lb/MMBtu	50	1.37E-05	3.30E-01	No	6.86E-04	1.50E+01	No
Ethylbenzene	< 2.48E-05	lb/MMBtu	50	CATEF	None	No	CATEF	3.30E+01	No
Ethylene Dibromide	< 2.13E-05	lb/MMBtu	50	2.13E-05	None	No	1.07E-03	1.10E+00	No
Formaldehyde	2.05E-02	lb/MMBtu	50	CATEF	1.20E-01	No	CATEF	1.40E+01	No
Methanol	3.06E-03	lb/MMBtu	50	3.07E-03	6.20E+01	No	1.53E-01	1.50E+05	No
Methylene Chloride	4.12E-05	lb/MMBtu	50	4.13E-05	3.10E+01	No	2.06E-03	8.20E+01	No
Naphthalene	< 9.71E-05	lb/MMBtu	50	CATEF	None	No	CATEF	2.40E+00	No
PAH	1.41E-04	lb/MMBtu	50	CATEF	None	No	CATEF	None	No
Styrene	< 1.19E-05	lb/MMBtu	50	1.19E-05	4.60E+01	No	5.96E-04	3.50E+04	No
Toluene	5.58E-04	lb/MMBtu	50	5.59E-04	8.20E+01	No	2.80E-02	1.20E+04	No
Vinyl Chloride	< 7.18E-06	lb/MMBtu	50	7.20E-06	4.00E+02	No	3.60E-04	1.10E+00	No
Xylene	1.95E-04	lb/MMBtu	50	1.95E-04	4.90E+01	No	9.77E-03	2.70E+04	No

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

<b>SUBSTANCE</b>	<b>E.F. MEAN</b>	<b>UNIT</b>	<b>Assumed Abatement Efficiency %*</b>	<b>Abated Emissions (lb/hr)</b>	<b>Acute Trigger Level (lb/hr)</b>	<b>HRSA Triggered? (Y/N)</b>	<b>Abated Emissions (lb/yr)</b>	<b>Chronic Trigger Level (lb/yr)</b>	<b>HRSA Triggered? (Y/N)</b>
1,3-Butadiene	1.04E-01	lbs/MMcf	50%	1.02E-04	1.50E+00	No	5.11E-03	4.80E-01	No
Acenaphthene	1.94E-03	lbs/MMcf	50%	1.91E-06	None	No	9.53E-05	None	No
Acenaphthylene	1.45E-02	lbs/MMcf	50%	1.42E-05	None	No	7.12E-04	None	No
Acetaldehyde	8.83E-01	lbs/MMcf	50%	8.68E-04	1.00E+00	No	4.34E-02	2.90E+01	No
Acrolein	5.47E-01	lbs/MMcf	50%	5.37E-04	5.50E-03	No	2.69E-02	1.40E+01	No
Anthracene	1.84E-03	lbs/MMcf	50%	1.81E-06	None	No	9.04E-05	None	No
Benzene	7.39E-02	lbs/MMcf	0%	1.45E-04	6.00E-02	No	7.26E-03	2.90E+00	No
Benzo(a)anthracene	3.39E-04	lbs/MMcf	50%	3.33E-07	None	No	1.67E-05	None	No
Benzo(a)pyrene	1.15E-04	lbs/MMcf	50%	1.13E-07	None	No	5.65E-06	None	No
Benzo(b)fluoranthene	2.37E-04	lbs/MMcf	50%	2.33E-07	None	No	1.16E-05	None	No
Benzo(g,h,i)perylene	1.95E-04	lbs/MMcf	50%	1.92E-07	None	No	9.58E-06	None	No
Benzo(k)fluoranthene	1.03E-04	lbs/MMcf	50%	1.01E-07	None	No	5.06E-06	None	No
Chrysene	3.10E-04	lbs/MMcf	50%	3.05E-07	None	No	1.52E-05	None	No
Dibenz(a,h)anthracene	1.25E-05	lbs/MMcf	50%	1.23E-08	None	No	6.14E-07	None	No
Ethylbenzene	1.16E-02	lbs/MMcf	50%	1.14E-05	None	No	5.70E-04	4.30E+01	No
Fluoranthene	9.95E-04	lbs/MMcf	50%	9.78E-07	None	No	4.89E-05	None	No
Fluorene	6.91E-03	lbs/MMcf	50%	6.79E-06	None	No	3.39E-04	None	No
Formaldehyde	4.99E-02	lbs/MMcf	0%	9.81E-05	2.10E-01	No	4.90E-03	1.80E+01	No
Indeno(1,2,3-cd)pyrene	1.69E-04	lbs/MMcf	50%	1.66E-07	None	No	8.30E-06	None	No
Naphthalene	7.65E-02	lbs/MMcf	50%	7.52E-05	None	No	3.76E-03	2.40E+00	No
Phenanthrene	7.07E-03	lbs/MMcf	50%	6.95E-06	None	No	3.47E-04	None	No
Propylene	1.60E+01	lbs/MMcf	50%	1.57E-02	None	No	7.86E-01	1.20E+05	No
Pyrene	1.79E-03	lbs/MMcf	50%	1.76E-06	None	No	8.79E-05	None	No
Toluene	1.07E+00	lbs/MMcf	50%	1.05E-03	8.20E+01	No	5.26E-02	1.20E+04	No
Xylene (m,p)	4.41E-01	lbs/MMcf	50%	4.33E-04	4.90E+01	No	2.17E-02	2.70E+04	No
Xylene (o)	2.17E-01	lbs/MMcf	50%	2.13E-04	4.90E+01	No	1.07E-02	2.70E+04	No
Xylene (Total)	6.02E-02	lbs/MMcf	50%	5.91E-05	4.90E+01	No	2.96E-03	2.70E+04	No
PAH Equivalents as Benzo(a)pyrene	2.66E-06	lbs/MMcf	50%	2.61E-09	5.00E+01	No	1.31E-07	3.30E-03	No

### **PLANT CUMULATIVE EMISSIONS**

Table 4 summarizes the cumulative increase in criteria pollutant emissions that will result 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>
NO <sub>x</sub>	0	0.001	0.001
POC	0	0.000	0.000
CO	0	0.003	0.003
PM <sub>10</sub>	0	0.000	0.000
SO <sub>2</sub>	0	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 each pollutant does not exceed 10 lb/day.

**OFFSETS**

Per Regulation 2-2-302, offsets must be provided for any new or modified source at a facility that has the potential to emit more than 10 tons/yr of POC or NO<sub>x</sub>. Based on the emission calculations in Table 4, offsets are not required for this application. 150 operation hours were used in the PTE calculations

**Table 4. PTE of Facility #24898: 150 hours of Annual Operation for S-1**

<b>Pollutant</b>	<b>Existing Annual Emissions (TPY)</b>	<b>Application Annual Emission (TPY)</b>	<b>Facility Annual Emissions</b>	<b>Offset Requirement (TPY)</b>	<b>Offset Required?</b>
NO <sub>x</sub>	0.000	0.003	0.003	10	N
POC	0.000	0.000	0.000	10	N
CO	0.000	0.009	0.009	-	N
PM <sub>10</sub> /PM <sub>2.5</sub>	0.000	0.001	0.001	100	N
SO <sub>2</sub>	0.000	0.000	0.000	100	N

**New Source Performance Standards (NSPS)**

The New Source Performance Standard (NSPS) in 40 CFR 60, Subpart JJJJ does apply because the engine is to be installed after January 1, 2011. The engine will comply with the following limits in Table 1 for emergency spark-ignited engines greater than 130 hp:

<b>Pollutant</b>	<b>S-1 Emission Factor</b>	<b>NSPS Standard</b>
NO <sub>x</sub>	0.075 g/bhp-hr	2.0 g/bhp-hr
POC	0.001 g/bhp-hr	1.0 g/bhp-hr
CO	0.216 g/bhp-hr	4.0 g/bhp-hr

As the information above shows, S-1 is in compliance with these NSPS emission requirements.

**National Emission Standards for Hazardous Air Pollutants (NESHAP)**

This engine will be classified as a HAP area source therefore will be subject to the Reciprocating Internal Combustion Engine (RICE) NESHAP (40 CFR Part 63, Subpart ZZZZ) because it is a new source and installed after 2007. A new RICE at an area source that is subject to Part 60 Subpart JJJJ NSPS requirements has no further requirements under Subpart ZZZZ pursuant to 40 CFR Part 63.6590(c). Therefore, S-1 complies with NESHAP by meeting the requirements under 40CFR60 (NSPS).

**STATEMENT OF COMPLIANCE**

The owner/operator of S-1 shall comply with Regulation 6, Rule 1 (*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 9-8-530 (*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)

The proposed equipment is located within 1000 feet of the K-12 school North Bay Christian Academy located at 6965 Redwood Blvd., Novato, CA, 94945. Therefore, the facility is not subject to Regulation 2-1-412 requirements.

**PERMIT CONDITIONS**

Permit Condition # 27326

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 Recordkeeping 9-8-530)
3. The Owner/Operator shall not operate unless the natural gas fired engine is abated with an integral three-way catalyst.  
(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.
- Hours of operation (maintenance and testing).
  - Hours of operation for emission testing.
  - Hours of operation (emergency).
  - For each emergency, the nature of the emergency condition.
  - Fuel usage for engine.
- (Basis: Emergency Standby Engines, Monitoring and Recordkeeping 9-8-530)

### **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 Natural Gas (NG) Engine  
PSI, Model: Industrial 8.8LT, Model Year: 2020  
259 BHP, 2.00 MMBtu/hr, Equipped with Integral Three-way Catalyst (TWC)**

By Isis Virrueta, AQT 1