ENGINEERING EVALUATION
Alexandria Real Estate EQ, Inc.
259 E Grand Avenue, South San Francisco, CA 94080
Facility ID No. 21170
Application No. 736707

BACKGROUND

Alexandria Real Estate EQ, Inc. (Alexandria) has applied for an Authority to Construct/Permit to Operate the following new sources:

S-8 Emergency Standby Diesel-Fired Generator w/ Integral Selective Catalytic Reduction System (SCR), Diesel Oxidation Catalyst (DOC), and Diesel Particulate Filter (DPF)
Make: Perkins; Model: 2806F-E18TAG1; Model Year: 2025
778 bhp, 5.02 MMBtu/hr
EPA Engine Family: SCPXL18.1HTH; EPA Tier 4 Final Certified
CARB Certified under Executive Order U-R-001-0699

S-9 Emergency Standby Diesel-Fired Generator w/ Integral Selective Catalytic Reduction System (SCR), Diesel Oxidation Catalyst (DOC), and Diesel Particulate Filter (DPF)
Make: Perkins; Model: 2806F-E18TAG1; Model Year: 2025
778 bhp, 5.02 MMBtu/hr
EPA Engine Family: SCPXL18.1HTH; EPA Tier 4 Final Certified
CARB Certified under Executive Order U-R-001-0699

S-10 Emergency Standby Diesel-Fired Generator w/ Integral Selective Catalytic Reduction System (SCR), Diesel Oxidation Catalyst (DOC), and Diesel Particulate Filter (DPF)
Make: Perkins; Model: 2806F-E18TAG1; Model Year: 2025
778 bhp, 5.02 MMBtu/hr
EPA Engine Family: SCPXL18.1HTH; EPA Tier 4 Final Certified
CARB Certified under Executive Order U-R-001-0699

S-8, S-9, and S-10 will provide emergency backup electrical power to Facility 21170, an existing commercial building, in the event of a power outage. S-8, S-9, S-10 will only operate during emergencies or for reliability related and testing purposes. S-8, S-9, and S-10 are certified to meet the Environmental Protection Agency and California Air Resources Board (EPA/CARB) Tier 4 Final Off-road emission standards for compression ignited engines. The engines 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 the proposed project's compliance with all applicable rules and regulations.

EMISSIONS

Criteria Air Pollutants

The criteria pollutants expected from the combustion of diesel fuel are Oxides of Nitrogen (NO_x), Precursor Organic Compounds (POC), carbon monoxide (CO), particulate matter with an aerodynamic diameter of 10 microns (PM_{10}), particulate matter with an aerodynamic diameter of 2.5 microns ($PM_{2.5}$), and sulfur dioxide (SO_2). NO_x, POC, CO and PM_{10} emissions are sourced from CARB Executive Order U-R-001-0699; $PM_{2.5}$ emissions are assumed to be equal to PM_{10} emissions; and the SO_2 emission were estimated as follows:

$$SO_2\ Emissions = \frac{0.000015\ lb-S}{lb-diesel} \times \frac{7.1\ lb-diesel}{gal} \times \frac{2\ lb-SO_2}{1\ lb-S} \times Fuel\ Consumption\ (gal/hr)$$

Maximum daily emissions are estimated assuming 24 hours of operation per day and annual emissions are estimated for 50 hours per year (hr/year) of reliability related and testing operation. Fuel usage is expressed in gallons per hour (gal/hr), emission factors are provided in grams per bhp-hour (g/bhp-hr), and emission rates are expressed as pounds per day (lb/day), pounds per year (lb/year), or tons per year (ton/year).

Table 1
Criteria Air Pollutant Emissions from S-8, S-9, or S-10

Operating Hours (hr/year)	Max Rated Output (bhp)	Fuel Use Rate (gal/hr)	Fuel Use Rate (MMBtu/hr)	Pollutant	Emission Factors (g/bhp-hr)	Max Daily Emissions (lb/day)	Annual Emissions (lb/year)	Annual Emissions (ton/year)
50	778	36.5	5.02	NO_x	0.5	20.58	42.9	0.021
				CO	2.6	107.03	223.0	0.112
				POC	0.14	5.76	12.0	0.006
				$PM_{2.5}$	0.02	0.82	1.7	0.001
				PM_{10}	0.02	0.82	1.7	0.001
				SO_2	-	0.19	0.39	0.000

Toxic Air Contaminants

Diesel Exhaust Particulate Matter (DEPM) is the primary Toxic Air Contaminant (TAC) of concern from diesel combustion sources. DEPM emissions are calculated using the same PM emission factor used to estimate $PM_{10}/PM_{2.5}$ emissions. Ammonia slip emissions are expected from S-8, S-9, and S-10 because each engine is equipped with an integral Selective Catalytic Reduction System. Ammonia slip emissions are calculated as follows:

- Ammonia slip is assumed to have a concentration of 10 ppmv at 15% O_2 in the exhaust
- The moisture content in the exhaust is assumed to be 12.5%
- The exhaust flow rate and temperature are sourced from the statement provided by the abatement device manufacturer

Ammonia emissions are calculated using the following formulas:

$$Emissions_{Hourly} = flowrate\left(\frac{ft^3-exh}{min}\right) \times \frac{60\ min}{hr} \times \frac{10\ ft^3-NH_3}{10^6\ ft^3-exh} \times (1-0.125)_{H2O} \times \frac{20.95\%}{20.95\%-15\%} \times \frac{459.67\ R+70\ R}{459.67\ R+T_{exhaust}} \times \frac{17\frac{lb}{lb-mol}}{386.9\frac{ft^3}{lb-mol}}$$

$$Emissions_{Annual} = Emissions_{Hourly} \times 50\frac{hour}{year}$$

Table 2 Ammonia Slip Emissions from S-8, S-9, and S-10					
Source	**Flowrate** (acfm)	**Flowrate** (scfm)	**Exhaust Temperature** (F^o)	**NH_3 Emissions**	
				(lbs/hour)	(lbs/year)
S-8	935	361.3	911	0.03	1.5
S-9	935	361.3	911	0.03	1.5
S-10	935	361.3	911	0.03	1.5

TAC emissions from S-8, S-9, and S-10 are summarized in Table 3 and compared to their respective TAC trigger levels in Regulation 2, Rule 5:

Table 3 Project TAC Emissions from S-8, S-9, and S-10						
TAC	**Hourly Emissions (lb/hr)**	**Acute Trigger (lb/hr)**	**Exceeds Acute trigger? Y/N**	**Annual Emissions (lb/year)**	**Chronic Trigger (lb/year)**	**Exceeds Chronic Trigger Y/N**
DEPM	1.0E-01	None	N	5.1E+00	2.6E-01	Y
Ammonia	8.8E-02	1.4E+00	N	4.4E+00	7.7E+03	N

Cumulative Increase

The existing cumulative increase for Facility 21170 is sum of the cumulative increase from sources S-2, S-3, and S-7 and sourced from applications 28797, 28972, and 29490, respectively. For each source the cumulative increase, in tons per year (tpy), is summarized as follows:

Application 28797

S-2: 0.154 tpy NO_x, 0.017 tpy CO, 0.008 tpy POC, 0.003 tpy PM_{10}, and 0.000 tpy SO_2

Application 28972

S-3: 0.063 tpy NO_x, 0.043 tpy CO, 0.003 tpy POC, 0.002 tpy PM_{10}, and 0.000 tpy SO_2

Application 29490

S-7: 0.175 tpy NO_x, 0.019 tpy CO, 0.003 tpy POC, 0.004 tpy PM_{10}, and 0.000 tpy SO_2

Table 4 below summarizes the cumulative increase in emissions for Facility 21170.

Table 4 Plant Cumulative Emissions Increase			
Pollutant	**Existing Cumulative Increase for Facility# 21170** (ton/year)	**Cumulative Increase from Application 736707** (ton/year)	**New Cumulative** (ton/year)
NOx	0.392	0.063	0.455
CO	0.079	0.336	0.415
POC	0.014	0.018	0.032
PM_{10}	0.009	0.003	0.012
$PM_{2.5}$	0.000	0.003	0.003
SO_2	0.000	0.000	0.000

HEALTH RISK ASSESSMENT (HRA)

As seen in Table 3, the combined Diesel Exhaust Particulate Matter emissions of 5.1 lb/year from S-8, S-9, and S-10 exceeds the chronic TAC trigger level of 0.26 lb/year for DEPM. Therefore, this application is subject to Regulation 2, Rule 5 and requires an HRA.

This application was deemed complete on November 3, 2025. There were no other related sources permitted at Facility 21170 in the past five years preceding the above completeness date.

HRA Results:
The HRA Report dated March 26, 2026 concluded…
"The HRA estimates the health risk resulting from toxic air contaminant (TAC) emissions from non-emergency operation of three standby generator diesel engines (S-8, S-9 and S-10) at this facility. Results from this HRA indicate that the project cancer risk is estimated at **1.2 in a million,** the project chronic hazard index (HI) is estimated at **0.00095**, and the project acute HI is estimated at **0.0023**."

T-BACT:
In accordance with the District's Regulation 2-5-301, none of the sources requires TBACT because each estimated source risk does not exceed a cancer risk of 1.0 in a million, and/or chronic hazard index of 0.20.

Project Risk Limits:
Since the estimated project cancer risk does not exceed 6.0 in a million and the hazard indices do not exceed 1.0, this proposed project complies with the project risk requirements of Regulation 2-5-302 for projects located in an Overburdened Community (OBC), as defined in Regulation 2-1-243.

Because an HRA was triggered, an OBC public notice is required per Regulation 2-1-412.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

BACT is triggered when a new or modified source has the potential to emit (PTE) 10.0 or more pounds of a BACT pollutant (NO_x, CO, POC, NPOC, PM_{10}, $PM_{2.5}$, and SO_2) on any day.

As seen in Table 1, NO_x and CO emissions exceed 10.0 pounds per day for each engine S-8, S-9, and S-10. Therefore, BACT is triggered for NO_x and CO emissions from S-8, S-9, and S-10.

Per Section 2-2-202, BACT is defined as an emission limitation, control device, or control technique applied at a source that is the most stringent of:

- the most effective device or technique successfully utilized,
- the most stringent emission limitation achieved by an emission control device or technique applicable for the source category
- the most effective emission control limitation for the source category that is contained in an approved State Implementation Plan, or
- the most effective control device or technique or most stringent emission limitation that is technologically feasible, taking into consideration cost-effectiveness, any ancillary health and environmental impacts, and energy requirements.

These requirements are generally categorized as either technologically feasible and cost-effective (BACT 1) or achieved-in-practice (BACT 2).

Because achieved-in-practice is required regardless of cost and BACT 1 is more stringent than BACT 2, an evaluation for what has been achieved-in-practice is conducted first.

Achieved-in Practice
Because this application was received on August 22, 2025, Achieved-in-practice BACT for S-8, S-9, and S-10 is presented in the BAAQMD BACT/TBACT Workbook for IC Engine – Compression Ignition: Stationary Emergency, non-Agricultural, non-direct drive fire pump > 50 BHP and < 1000 BHP Output, Document #96.1.3, Revision 9. dated 12/02/2024.

For NO_x and CO, achieved-in-practice BACT is the US EPA Tier 4 Final Standard for the applicable horsepower range.

Technologically Feasible and Cost-Effective
The following control technologies and mitigation measures have been found to be technologically feasible for abating NO_x emissions from internal combustion engines[1]:

- Engine Ignition Timing Retard (achievable NO_x reduction 20 to 30 percent), and
- Selective Catalytic Reduction (achievable NO_x reduction of 90 percent)

The following techniques have been identified for mitigating CO emissions from internal combustion engines:

- Catalytic Oxidation

[1] United States Environmental Protection Agency. Control Techniques Guidelines for Alternative Control Techniques Document – NO_X Emissions from Stationary Reciprocating Internal Combustion Engines. EPA-453/R-93-032. July 1993. Updated September 2000.

- Good combustion practices (e.g. preventative maintenance, change oil and filter every 500 hours of operation, inspect all hoses and belts every hours of operation, minimize idling time)

Although Regulation 2, Rule 2 does not include a definition for cost-effective, Regulation 2-2-214 requires the Air District to publish and periodically update a BACT workbook and that BACT will be determined using the workbook as a guidance document.

Section 1 of the BACT Workbook includes a maximum cost guideline for NO_x emissions of $17,500 per ton of emissions reduced. The BACT Workbook does not have a maximum cost-effectiveness value for CO. However, the South Coast Air Quality Management District lists a maximum cost-effectiveness value of $876 per ton of emissions reduced (Q4 of 2025).

Using the maximum cost-effectiveness value and assuming 90% by weight of the NO_x emissions from each source is abated, the maximum annualized cost for NO_x controls cannot exceed $331 per year (= 0.021*0.90*17,500) in order to be cost-effective. Similarly, assuming 90% by weight of the CO emissions in Table 1 from each source is abated, the maximum annualized cost for CO controls cannot exceed $88 per year (= 0.112*0.9*876) in order to be cost-effective.

NO_x and CO controls are expected to exceed the maximized annualized costs of $331/year/source and $88/year/source, respectively. Therefore, requiring NO_x and CO controls that are more stringent than achieved-in-practice will not be cost-effective.

S-8, S-9, and S-10 are required to comply with the current achieved-in-practice standards below:

Pollutant	**Emission Factor**	**BACT(2) Standard**
NO_x	0.5 g/bhp-hr	0.5 g/bhp-hr
CO	2.6 g/bhp-hr	2.6 g/bhp-hr

OFFSETS

Offsets are required for new and modified sources when the potential to emit NO_x or POC at a facility exceeds 10 tons per year per pollutant. Per the Air District policy titled "Calculating Potential to Emit for Emergency Backup Power Generators" dated June 3, 2019, the potential to emit for S-8, S-9, and S-10 was calculated assuming 150 hours of operation per year per engine only for the purpose of determining if offsets are required for the above pollutants. Per Table 5, the facility's PTE does not exceed 10 tons per year for either NO_x or POC. Therefore, the increase in NO_x or POC emissions from Application 736707 does not need to be offset per Regulation 2-2-302.

Table 5 NO_x and POC Offsets					
Pollutant	**Current PTE** (ton/year)	**Increase In PTE (A# 736707)** (ton/year)	**PTE Post-Application** (ton/year)	**Offset Threshold** (ton/year)	**Offsets Required?**
NO_x	7.614	0.189	7.803	10	No
POC	0.399	0.054	0.453		No

Per Regulation 2-2-303, offsets are required for a new or modified source at a facility that will have a potential to emit more than 100 tons or more per year per pollutant of $PM_{2.5}$, PM_{10}, or sulfur dioxide after the new or modified source is constructed. Per the Air District's policy titled "Calculating Potential to Emit for Emergency Backup Power Generators" dated June 3, 2019, the potential to emit from S-8, S-9, and S-10 was calculated assuming 150 hours of operation per year only for the purpose of determining applicability of offsets. As seen in Table 6, the facility's PTE does not equal or exceed 100 tons per year for the above three pollutants. Therefore, the increase in $PM_{2.5}$, PM_{10}, and SO_2 emissions from Application 736707 does not need to be offset per Regulation 2-2-303.

Table 6 $PM_{2.5}$, PM_{10}, and SO_2 Offsets					
Pollutant	**Current PTE** (ton/year)	**Increase in PTE (A# 736707)** (ton/year)	**PTE Post-Application** (ton/year)	**Offset Threshold** (ton/year)	**Offsets Required?**
$PM_{2.5}$	0.522	0.009	0.531	100	No
PM_{10}	0.522	0.009	0.531		No
SO_2	0.194	0.003	0.197		No

STATEMENT OF COMPLIANCE

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

California Environmental Quality Act (CEQA)

This permit application is categorically exempt from CEQA. CEQA Guidelines Section 15301 exempts projects that involve negligible or no expansion of existing use. The emergency standby engines will not expand the facility's normal operation and will result in no increase or only a negligible increase in use of the facility. Further, based on the review of the permit application materials, including Appendix H, environmental information form, the project will not have any significant environmental impacts, and cumulative impacts from successive projects of the same type in the same place will not result in significant environmental impacts.

Public Notice, Schools & Overburdened Communities

Public notification is required for the following:

(a) New or modified sources that result in an increase in hazardous air emissions located within 1,000 feet of the outer boundary of a K-12 school site.

(b) New or modified sources located within an Overburdened Community for which a Health Risk Assessment is required

S-8, S-9, and S-10 will not be located within 1,000 feet of the outer boundary of a K-12 school site but the engines will be located within an Overburdened Community, as defined in 2-1-243. As seen in the HRA section of this evaluation, an HRA was required for this application. Therefore, public noticing per Regulation 2-1-412 will be required prior to taking final action on this application.

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

District Rules
6-1-303 – Ringelmann No. 02 Limitation and 6-1-305 – Visible Particles
S-8, S-9, and S-10 are subject to Regulation 6, Rule 1. Opacity and visible emissions from S-8, S-9, and S-10 are limited by Regulation 6-1-303.1 (internal combustion engines of less than 25 liters (1,500 cubic inches (in^3)) displacement). S-8, S-9, and S-10 each have a displacement of 18.1 liters (1,105 in^3) and are expected to comply with Regulation 6-1-303.1.

Section 6-1-303.2 prohibits engines used solely as a standby source of motive power to emit for more than 3 minutes per hour visible emissions as dark or darker than Ringelmann No. 2 or equivalent opacity. S-8, S-9, and S-10 are expected to comply with Regulation 6-1-303.2.

Regulation 6-1-305 prohibits emissions of particles from any operation in sufficient number to cause annoyance to any other person where the particles are large enough to be visible individually as particles at the emission point, or of such size and nature as to be visible individually as incandescent particles. S-8, S-9, and S-10 are not expected to produce visible emissions or fallout in violation of this regulation and are expected to be in compliance with Regulation 6-1-305.

6-1-310 – Total Suspended Particulate (TSP) Concentration Limits
Regulation 6-1-310.1 prohibits emissions of TSP in excess of 0.15 grains per dry standard cubic foot (dscf) of exhaust volume. S-8, S-9, and S-10 will comply with 6-1-310.1 as shown below:

PM_{10} emission rate = 0.0343 lb-PM_{10}/hr

Outlet flow rate = 316.1 dscfm (935 acfm @ 911 °F with 12.5% water vapor)

Outlet Grain Loading Rate = 0.013 gr/dscf (0.0343 × 7,000 ÷ 316.1 ÷ 60)

Regulations 6-1-310.2 and 6-1-311.2 do not apply since the potential to emit Total Suspended Particulate (TSP) for S-8, S-9, and S-10 is significantly lower than 1,000 kg/hr/source. Also, the above sections apply to processes that handle or process materials, and not internal combustion engines like S-8, S-9, and S-10.

Compliance with applicable standards in Regulation 6, Rule 1 will be confirmed by Air District Compliance and Enforcement staff during routine inspections of the facility.

9-1-301 – Limitation on Ground Level Concentration

S-8, S-9, and S-10 are subject to and expected to comply with the applicable SO_2 limitations in Regulation 9, Rule 1 ("Inorganic Gaseous Pollutants - Sulfur Dioxide"). Because SO_2 emissions from each engine are negligible (0.39 lb/year), the facility will not be required to conduct ground level monitoring of SO_2.

9-1-304 – Fuel Burning (Liquid and Solid Fuels)

This section requires that the sulfur content of any liquid fuel does not exceed 0.5% by weight. The California Air Resources Board (CARB) requires all diesel engines to burn Ultra Low Sulfur Diesel with a sulfur content of 15 ppm by weight or less (≤ 0.0015% by wt.), which is less than 0.5% by wt. requirement in Section 9-1-304. The requirement to ensure S-8, S-9, and S-10 exclusively burn CARB diesel (~ULSD) is memorialized in proposed permit condition #100456.

9-8-110 – Exemptions

S-8, S-9, and S-10 will be operated as emergency standby engines. Therefore, S-8, S-9, and S-10 are not subject to the emission rate limits in Regulation 9, Rule 8 and are exempt from the requirements of Sections 9-8-301 through 9-8-305, 9-8-501, and 9-8-503. S-8, S-9, and S-10 are subject to and are expected to comply with Section 9-8-330.3 because their non-emergency hours of operation will be limited in the proposed permit condition #100468 to 50 hours per year per engine. S-8, S-9, and S-10 are subject to and expected to comply with the monitoring and recordkeeping requirements of 9-8-502.1 and 9-8-530.

Airborne Toxic Control Measure for Stationary Compression Ignition Engines

ATCM, 5/19/2011, Section 93115, Title 17, CA Code of Regulations

New Source Performance Standards (NSPS)

40 CFR Part 60, Subpart IIII (*Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*)

National Emissions Standards for Hazardous Air Pollutants

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

PERMIT CONDITIONS

Permit Condition #100072 for S-8, S-9, and S-10

1. 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 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]

2. 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]

3. 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. Fuel usage for each engine(s).

    [Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

4. 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: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

Permit Condition #100456 for S-8, S-9, and S-10

1. The owner/operator shall fire each engine exclusively with CARB diesel fuel having a sulfur content no more than 15 parts per million by weight.
    [Basis: Cumulative Increase, Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

Permit Condition #100468 for S-8, S-9, and S-10

1. The owner/operator shall not exceed 50 hours of operation per year per engine for reliability-related activities.

[Basis: Cumulative Increase; Regulation 2-5; Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

Permit Condition #100883 for S-8, S-9, and S-10

1. The owner/operator shall abate each engine at all times of operation by an approved Selective Catalytic Reduction (SCR) System. Each engine and its associated SCR System shall be installed, maintained, and operated in accordance with the manufacturer specifications and/or best modern practices.
   [Basis: Cumulative Increase, Title 17 CCR Section 93115.6(a)(3), 40 CFR 1039.101]

2. The owner/operator shall commence urea injection as soon as the SCR catalyst bed reaches minimum operating temperature as specified by the manufacturer.
   [Basis: Cumulative Increase, Title 17 CCR Section 93115.6(a)(3), 40 CFR 1039.101]

3. The owner/operator shall not exceed an ammonia (NH3) slip of 10 ppmv, dry @ 15% O2 from each engine's respective SCR system. If deemed necessary to demonstrate compliance with Regulation 2, Rule 5, the Air District may require a source test to determine compliance with this emission limit.
   [Basis: Regulation 2, Rule 5]

4. To determine compliance with the above conditions, the owner/operator shall maintain the following records in an Air District-approved log and shall make these records available to Air District staff upon request. All records shall be retained for at least 60 months from the date of entry. These recordkeeping requirements shall not replace the recordkeeping requirements contained in any applicable Air District or state regulations.
   a. Engine and SCR maintenance records
   b. SCR system owner's manual or manufacturer's specifications
   [Basis: Cumulative Increase, Recordkeeping, Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

End of Conditions

Recommendation

The Air District has evaluated the permit application for the proposed project and has made a preliminary determination that the project is expected to comply with all applicable Air District, state, and federal air quality-related regulations, including the health risks resulting from toxic air contaminant emissions. The preliminary recommendation is to issue a permit for this project. After considering all comments received, the Air District will make a final determination.

I recommend that the Air District initiate the public comment period and consider any comments received prior to taking any final action on issuance of an Authority to Construct for the following sources:

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Prepared By: Kevin Perez, Senior Air Quality Engineer
Date: April 2, 2026

Attachment 1

Existing Potential to Emit (PTE)

PTE Table (ton/year)						
Source	**NO_x**	**CO**	**POC**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**
S-2	0.462	0.051	0.024	0.009	0.009	0.001
S-3	0.189	0.129	0.009	0.006	0.006	0.000
S-4†	2.146	1.796	0.119	0.165	0.165	0.064
S-5†	2.146	1.796	0.119	0.165	0.165	0.064
S-6†	2.146	1.796	0.119	0.165	0.165	0.064
S-7	0.525	0.057	0.009	0.012	0.012	0.001
Total	7.614	5.625	0.399	0.522	0.522	0.194

†Registered Boiler

S-2 PTE is based on the data in the evaluation report for Application 28797 and calculated assuming 150 hours of operation (50 non-Emergency and 100 Emergency)
S-3 PTE is based on the data in the evaluation report for Application 28972 and calculated assuming 150 hours of operation (50 non-Emergency and 100 Emergency)
S-4, S-5, and S-6 PTE are calculated using the heat input rate (5.0 MMBtu/hr each), emission factors from Tables 1.4-1 and 1.4-2 from AP-42, and assuming 8,760 hours of operation per year.
S-7 PTE is based on the data in the evaluation report for Application 29490 and calculated assuming 150 hours of operation (50 non-Emergency and 100 Emergency)