ENGINEERING EVALUATION
United Airlines, Inc.
800 S Airport Boulevard, San Francisco, CA 94128
Facility ID No. 51
Application No. 742728

BACKGROUND

United Airlines has applied for an Authority to Construct/Permit to operate for the following new source:

S-432 Emergency Standby Diesel-Fired Generator
Make: Caterpillar; Model: C9; Model Year: 2025
EPA Tier 3 Certified; EPA Family Name: SCPXL08.8NZS
398 brake horsepower (bhp), 2.63 Million British Thermal Units per hour (MMBtu/hr);

Abated by:

A-423 Diesel Particulate Filter
Make: Johnson Matthey; Model: CRT(+)-3-CS-EIEO-10/10-LP

A-424 Selective Catalytic Reduction System
Make: Johnson Matthey; Model: S4x2x2+1-EIEO-10/10

S-432 will replace an existing emergency standby diesel-fired generator engine, S-300, and will provide backup electrical power to Facility 51 in the event of a power outage. S-432 will only operate during emergencies or for reliability related and testing purposes. S-432 is certified to meet the Environmental Protection Agency and California Air Resources Board (EPA/CARB) Tier 3 Off-road standards for compression ignited engines. United Airlines will install S-432 with add-on abatement devices A-423 and A-424. 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 with all applicable rules and regulations for the proposed project.

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, and CO emissions are based on data provided by the engine manufacturer and guarantees from the abatement device manufacturer; the unabated PM_{10} emission rate is sourced from EPA's Annual Certification database for Non-road Compression Ignition Engines and $PM_{2.5}$ emissions are assumed to be equal to PM_{10} emissions; Per internal policy, A-423 is conservatively assumed to abate 70% by weight of the $PM_{10/2.5}$ emissions from the exhaust of S-432; and the SO_2 emissions were estimated as follows:

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

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-432

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	398	19.1	2.63	NO_x	0.22	4.63	9.65	0.005
				CO	0.14	2.95	6.14	0.003
				POC	0.05	1.05	2.19	0.001
				$PM_{2.5}$	0.03	0.63	1.32	0.001
				PM_{10}	0.03	0.63	1.32	0.001
				SO_2	-	0.10	0.20	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 A-424, the 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

Source	Flowrate (acfm)	Flowrate (scfm)	Exhaust Temperature (F°)	NH_3 Emissions	
				(lbs/hour)	(lbs/year)
S-432	2,246	901.5	860	0.073	3.7

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TAC emissions from S-432 and its abatement devices are summarized in Table 3 and compared to the respective TAC trigger levels in Regulation 2, Rule 5:

Table 3 Project TAC Emissions						
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	2.6E-02	None	N	1.3E+00	2.6E-01	Y
Ammonia	7.3E-02	1.4E+00	N	3.7E+00	7.7E+03	N

Cumulative Increase

Because Facility 51 and Facility 12197 constitute a single facility as defined in Regulation 2-1-213, the combined cumulative increase for Facility 51 and 12197 are tracked together and presented in Table 4.

Table 4 Plant Cumulative Emissions Increase				
Pollutant	**Existing Cumulative Increase for Facility# 51[A]** (ton/year)	**Existing Cumulative Increase for Facility# 12197** (ton/year)	**Project Increase** (ton/year)	**New Cumulative** (ton/year)
NO_x	44.945	0.033	0.005	44.983
CO	2.183	0.013	0.003	2.199
POC	8.941	2.462	0.001	11.404
PM_{10}	1.927	0.002	0.001	1.930
$PM_{2.5}$	0.023	0.002	0.001	0.026
SO_2	0.470	0.000	0.000	0.470

[A] Cumulative increase for Facility 51 in Table 4 accounts for 4 Applications 30964, 31710, 704781, and 728746 not currently shown in New Production System. Cumulative increase from applications 30964 (S-285), 31710 (S-335), and 704781 (S-423 through S-427) is summarized in Attachment I.

Per Regulation 2-2-607.2, United Airlines has submitted information necessary to evaluate the contemporaneous onsite emission reduction credits (CERCs) for NO_x and POC emissions from shutting down S-300. This application (742728) was deemed complete on December 11, 2025 which was used to establish the baseline period end date per Regulation 2-2-603.1.3. Therefore, the baseline period for S-300 is from December 12, 2022 to December 11, 2025. United Airlines reported a total throughput of 27.6 hours of operation of S-300 for reliability-related and testing purposes during the baseline period. Therefore, the baseline throughput, per Regulation 2-2-603.3, is 9.2 hours per year.

S-300 was evaluated as a loss of exemption (LOE) source under Application 4772 in 2002 and has operated at Facility 51 since 1989. Because LOE sources are neither new nor modified sources, PTE from S-300 was not quantified under Application 4772. Had emissions from S-300 been quantified in 2002, the Air District would have estimated the PTE using emission factors provided in Table 3.3-1 of EPA's AP-42. The applicable NO_x and POC emission factors are 0.031 lb/hp-hr and 0.00247 lb/hp-hr, respectively, and would be used to calculate the baseline emission rate per

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Regulation 2-2-603.5. Per Regulation 2-2-603.6, the adjusted baseline emission rate is determined using the NO_x and POC emission factors for 2008 and newer model year engines from Table 1 of the Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines (Title 17 of the California Code of Regulations, Section 93115) which are similar to the Tier 3 standards for the applicable horsepower range (≥300 HP to < 600 HP).

Per Table 1 of the Stationary ATCM, the applicable emissions standard for NO_x + non-methane hydrocarbons (NMHC) is 3.0 g/bhp-hr. Therefore, the NO_x and POC emission factors are 2.85 g/bhp-hr and 0.15 g/bhp-hr, respectively (apportioning the standard from Table 1 of the ATCM as 95% NO_x and 5% POC). The baseline throughput and calculation of the CERCs from shutting down S-300 are summarized in Table 5 below:

Table 5
CERCs from Shutting Down S-300

Source	Baseline Throughput (hr/year)	Emission Factors (g/bhp-hr)		Horsepower Rating (bhp)	CERCs (ton/year)	
		NO_x	POC		NO_x	POC
S-300	9.2	2.85	0.15	400	0.012	0.001

HEALTH RISK ASSESSMENT (HRA)

As seen in Table 3, the Diesel Exhaust Particulate Matter emissions of 1.3 lb/year from S-432 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 December 11, 2025. There were no other related sources permitted at Facility 51 in the past five years preceding the above completeness date.

HRA Results:
The HRA Report dated April 20, 2026 concluded…
"This analysis estimates the incremental health risk resulting from toxic air contaminant (TAC) emissions from non-emergency operation of a new standby generator diesel engine (S-432) at this facility. Results from this HRA indicate that the project cancer risk is estimated at **0.013 in a million,** the project chronic hazard index (HI) is estimated at **0.000011**, and the project acute HI is estimated at **0.00058**."

T-BACT:
In accordance with the District's Regulation 2-5-301, S-432 does not require TBACT because 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.

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

BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

Per Section 2-2-301, 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, POC, NPOC, CO, PM_{10}, $PM_{2.5}$, and SO_2) on any day.

As seen in Table 1, the post-abatement potential to emit from S-432 is less than 10.0 pounds in a day for each BACT pollutant. Therefore, BACT is not triggered for any BACT pollutant emitted from S-432.

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 policy titled "Calculating Potential to Emit for Emergency Backup Power Generators" dated June 3, 2019, the potential to emit from S-432 is calculated assuming 150 hours of operation per year only for the purpose of determining applicability of offsets. The current PTE in Table 6 is based on the facility PTE calculation in Attachment I.

Table 6
NO_x and POC Offsets

Pollutant	Current PTE (ton/year)	Increase In PTE (A# 748728) (ton/year)	PTE Post-Application (ton/year)	Offset Threshold (ton/year)	Offsets Required?
NO_x	124.307	0.014	124.321	10	No
POC	>100	0.003	>100		No

As seen in Table 6, the facility's PTE exceeds 10 tons per year for both NO_x and POC emissions. Per Table 4, the NO_x and POC cumulative increase from S-432 are 0.005 tons per year and 0.001 tons per year, respectively. Per Table 5, the NO_x and POC CERCs from shutting down S-300 are 0.012 tons per year and 0.001 tons per year. Because the NO_x and POC CERCs from shutting down S-300 are greater than or equal to the NO_x and POC cumulative increase from S-432, United Airlines does not need banked Emission Reduction Credits (ERCs) to offset the cumulative increase from S-432.

Although BACT is not triggered for NO_x or POC emissions, United Airlines will be required to demonstrate through source testing that the NO_x and POC emissions of S-432, after abatement by A-423 and A-424, can comply with the abatement device vendor-proposed emission rates of 0.22 g-NO_x/bhp-hr and 0.05 g-POC/bhp-hr to ensure that offsets are not required for Application 742728. Source testing for CO will be required because NO_x and CO emissions are inversely related for combustion sources. To provide United Airlines with a compliance margin, the Tier 4

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Final standard of 2.6 g-CO/bhp-hr is used as the CO emission standard for source testing purposes because offsets cannot be triggered for CO emissions.[1]

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 policy titled "Calculating Potential to Emit for Emergency Backup Power Generators" dated June 3, 2019, the potential to emit from S-432 is calculated assuming 150 hours of operation per year only for the purpose of determining applicability of offsets. As seen in Table 7, 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 742728 does not need to be offset per Regulation 2-2-302.

Table 7
$PM_{2.5}$, PM_{10}, and SO_2 Offsets

Pollutant	Current PTE (ton/year)	Increase in PTE (A# 748728) (ton/year)	PTE Post-Application (ton/year)	Offset Threshold (ton/year)	Offsets Required?
$PM_{2.5}$	32.231	0.002	32.233	100	No
PM_{10}	32.232	0.002	32.234		No
SO_2	10.576	0.000	10.576		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 engine 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

S-432 will not be located within 1,000 feet of the outer boundary of a K-12 school but S-432 will operate within an OBC. Per Table 3, an HRA is required for this application. Therefore, a 30-day OBC public notice is required prior to issuance of an Authority to Construct for Application 742728.

Prevention of Significant Deterioration (PSD)

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

[1] The Engineering Division's Backup Generator group typically requires source testing for engines with add-on abatement devices to demonstrate compliance with Tier 4 Final standards for pollutants because applications handled by the Backup Generator group are typically for facilities that do not exceed the offset threshold.

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District Rules

6-1-303 – Ringelmann No. 02 Limitation and 6-1-305 – Visible Particles

S-432 is subject to Regulation 6, Rule 1. Opacity and visible emissions from S-432 are limited by Regulation 6-1-303.1 (internal combustion engines of less than 25 liters (1,500 cubic inches (in^3)) displacement). S-432 has a displacement of 8.8 liters (538 in^3) and is 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-432 is 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-432 is not expected to produce visible emissions or fallout in violation of this regulation and is expected to comply 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-432 will comply with 6-1-310.1 as shown below:

PM_{10} emission rate = 0.026 lb-PM_{10}/hr

Outlet flow rate = 901.5 dscfm (2,246 acfm @ 860 °F with 12.5% water vapor)

Outlet Grain Loading Rate = 0.0034 gr/dscf (0.026 × 7,000 ÷ 901.5 ÷ 60)

Regulations 6-1-310.2 and 6-1-311.2 do not apply since the PTE of Total Suspended Particulate (TSP) from S-432 is significantly lower than 1,000 kg/hr. Also, the above sections apply to processes that handle or process materials, not internal combustion engines.

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-432 is 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 S-432 are negligible (0.20 lb/year), United Airlines 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

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0.5% by wt. requirement in Section 9-1-304. The requirement to ensure S-432 exclusively burns CARB diesel (~ULSD) is memorialized in proposed permit condition #100456.

9-8-110 – Exemptions
S-432 will be operated as an emergency standby engine. Therefore, S-432 is not subject to the emission rate limits in Regulation 9, Rule 8 and is exempt from the requirements of Sections 9-8-301 through 9-8-305, 9-8-501, and 9-8-503. S-432 is subject to and expected to comply with Section 9-8-330.3 because the non-emergency hours of operation will be limited in the proposed permit condition #100468 to 50 hours per year. S-432 is 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 Ignited 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-432

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).

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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-432

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 #100073 for S-432

The owner/operator shall not exceed the following limits per year per engine for reliability-related activities:
50 hours of Diesel fuel (Diesel fuel)
[Basis: Cumulative Increase; Regulation 2-5; Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

Permit Condition #100902 for S-432

1. The owner/operator shall ensure S-432 is abated at all times of operation by, A-423, Diesel Particulate Filter (DPF), and A-424, Selective Catalytic Reduction (SCR) System, equipped with a backpressure monitor or other approved Diesel Exhaust Particulate Matter Abatement System. S-432, A-424, and A-423 with backpressure monitor or other approved system shall be installed, maintained, and operated in accordance with the manufacturer specifications and/or best modern practices.

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[Basis: Cumulative Increase, Title 17 CCR Section 93115.6(a)(3), 40 CFR 1039.101, TBACT]

2. The owner/operator shall take all corrective actions recommended by the manufacturer of A-23 and A-424 in response to backpressure monitor notifications.
[Basis: Cumulative Increase, Title 17 CCR Section 93115.6(a)(3), 40 CFR 1039.101, TBACT]

3. The owner/operator shall ensure urea injection commences 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, TBACT]

4. The owner/operator shall ensure S-432 emissions do not exceed an ammonia (NH3) slip of 10 ppmv, dry @ 15% O2 from A-424. 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]

5. The owner/operator shall ensure engine emissions do not exceed the following limits:
NOx: 0.22 g/bhp-hour
CO: 2.6 g/bhp-hour
POC: 0.05 g/bhp-hour
[Basis: Cumulative Increase]

6. To demonstrate compliance with Part 5, the owner/operator shall conduct an initial Air District-approved source test on S-432 within 60 days of startup and once every three years thereafter at the normal or expected load during emergency operation using Air District approved source test methods. The owner/operator shall document urea usage (gallon per minute) and average kW during all tests, preferable as digital records. The owner/operator shall submit the source test results to the Air District's Source Test Section no later than 60 days after source test completion.
[Basis: Cumulative Increase]

7. The owner/operator shall comply with all applicable testing, sampling port location and safe access requirements as specified in Volume IV of the Air District's Manual of Procedures. The owner/operator shall notify the Air District's Source Test Section, in writing, of the source test protocols, sampling port locations, layout, access and projected test dates at least 30 days prior to testing. The following test methods shall be used for each pollutant:
NOx EPA Method 7E or Air District-approved equivalent
CO EPA Method 10 or Air District-approved equivalent
POC EPA Method 25A and EPA Method 18 or Air District-approved equivalent
[Basis: Regulation 2-1-403]

8. To determine compliance with the above condition, the owner/operator shall maintain the following records in an Air District-approved log and shall make these records available to

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Air District staff upon request. All records shall be retained for at least 36 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. Source Test Notifications
b. All source test reports
c. Engine serial number and source number for each source test
d. Engine load percentage
e. Engine, SCR, and DPF maintenance records
f. SCR system owner's manual or manufacturer's specifications
g. DPF owner's manual or manufacturer's specifications
h. All backpressure monitor notifications and corrective actions
i. SCR urea injection rate (gpm)

[Basis: BACT, Cumulative Increase, and Recordkeeping]

End of Conditions

Recommendation

I recommend the Air District issue an Authority to Construct for the following source:

S-432 Emergency Standby Diesel-Fired Generator
Make: Caterpillar; Model: C9; Model Year: 2025
EPA Tier 3 Certified; EPA Family Name: SCPXL08.8NZS
398 bhp, 2.63 MMBtu/hr

Abated by:

A-423 Diesel Particulate Filter
Make: Johnson Matthey; Model: CRT(+)-3-CS-EIEO-10/10-LP

A-424 Selective Catalytic Reduction System
Make: Johnson Matthey; Model: S4x2x2+1-EIEO-10/10

Prepared By: Kevin Perez, Senior Air Quality Engineer
Date: May 11, 2026

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Attachment I

Pre-Project Potential to Emit (PTE) Calculation

Table A Pre-Project Facility PTE (ton/year)						
Source	**NO_x**	**CO**	**POC**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**
1	0.000	0.000	104.160	0.000	0.000	0.000
9						
10						
57						
64						
78						
80						
112						
128						
16	0.000	0.000	0.000	0.000	0.000	0.000
17						
18						
19						
20						
21						
22						
23						
56	0.000	0.000	9.545	0.000	0.000	0.000
61*†	0.000	0.000		0.026	0.026	0.000
87	2.841	5.022	2.379	2.775	2.775	0.958
88	2.841	5.022	2.379	2.775	2.775	0.958
89	13.137	23.218	10.998	12.831	12.831	4.430
90	90.900	6.956	0.748	6.540	6.540	1.574
92*†	0.000	0.000		0.000	0.000	0.000
95	4.625	34.479	2.271	3.154	3.154	1.261
96	4.625	34.479	2.271	3.154	3.154	1.261
106*†	0.000	0.000		0.006	0.006	0.000
114*†	0.000	0.000		0.006	0.006	0.000
123*†	0.000	0.000		0.083	0.083	0.000
126*†	0.000	0.000		0.136	0.136	0.000
146*†	0.000	0.000		0.327	0.327	0.000
150*†	0.000	0.000		0.000	0.000	0.000
152*†	0.000	0.000		0.008	0.008	0.000
155*†	0.000	0.000		0.072	0.072	0.000
156*†	0.000	0.000		0.044	0.044	0.000
157*†	0.000	0.000		0.062	0.062	0.000
198*†	0.000	0.000		0.000	0.000	0.000
240*†	0.000	0.000		0.000	0.000	0.000
244	0.000	0.000	3.200	0.000	0.000	0.000
258*†	0.000	0.000		0.000	0.000	0.000
262*†	0.000	0.000		0.000	0.000	0.000
284*†	0.000	0.000		0.000	0.000	0.000
285	0.000	0.000	0.161	0.000	0.000	0.000
286	0.000	0.000	0.020	0.000	0.000	0.000
287*†	0.000	0.000		0.000	0.000	0.000

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Table A Pre-Project Facility PTE (ton/year)						
Source	**NO_x**	**CO**	**POC**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**
288	0.000	0.000	0.098	0.000	0.000	0.000
289	0.000	0.000	0.098	0.000	0.000	0.000
290	0.000	0.000	0.098	0.000	0.000	0.000
295	0.279	0.060	0.022	0.020	0.020	0.018
296	0.279	0.060	0.022	0.020	0.020	0.018
297	0.428	0.092	0.034	0.030	0.030	0.028
300	0.744	0.160	0.059	0.053	0.053	0.049
313	0.158	0.034	0.013	0.011	0.011	0.010
314	0.027	0.006	0.002	0.002	0.002	0.002
316 317 318 319 320 321 322 323	0.000	0.000	0.000	0.008	0.008	0.000
326	0.843	0.095	0.058	0.015	0.015	0.001
330*†	0.000	0.000		0.000	0.000	0.000
331*†	0.000	0.000		0.000	0.000	0.000
333	0.789	0.106	0.058	0.011	0.011	0.001
335*†	0.000	0.000		0.000	0.000	0.000
400*†	0.000	0.000		0.000	0.000	0.000
423	0.230	0.250	0.008	0.009	0.009	0.001
424	0.230	0.250	0.008	0.009	0.009	0.001
425	0.230	0.250	0.008	0.009	0.009	0.001
426	0.230	0.250	0.008	0.009	0.009	0.001
427	0.230	0.250	0.008	0.009	0.009	0.001
32000*	0.541	0.135	0.022	0.012	0.012	0.002
277††	0.000	0.000	2.460	0.000	0.000	0.000
300††	0.100	0.038	0.005	0.005	0.005	0.000
Total	124.307	111.212	>100	32.231	32.231	10.576

*Exempt Source

†POC emissions not calculated because facility PTE > 100

††Source is under Facility 12197

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