Facility Name:

**Equipment Type:** 

**Application #:** 

ID#:

**Equipment/Facility Address:** 

**Facility Contact:** 

US Border Protection Air & Marine

34H – Emergency Diesel Engine

APCD2023-APP-007687

APCD1987-SITE-07196

1802 Saturn Blvd San Diego, CA 92154

Patrick Tam, Consultant (714) 893-7900 tam@proehs.com

Recoverable Signature

John Lee Air Pollution Control Engineer Signed by: 188adb1f-5406-42f1-954c-0fac70705fb3

**Permit Engineer:** 

Recoverable Signature

Jim Swanev

Jim Swaney Senior Air Pollution Control Engineer Signed by: 4f6a3c69-5263-42b7-937d-4b3b524063e0

**Senior Engineer Signature:** 

# 1.0 Background

1.1 Type of Application: New installation of emergency diesel engine

# 1.2 Permit History: This facility has one active permit for gas dispensing station.

- APCD1987-SITE-07196 --> [LUEG-APCD,Administrative,Site,NA]; Status: Active
   APCD2011-APP-001576 --> [LUEG-APCD,Permit App,Internal Combustion Engines,NA]; Status: Void
   APCD2011-CER-000265 --> [LUEG-APCD,Certificate App,IC Engine Status,NA]; Status: Approved
   APCD2011-PTO-000836 --> [LUEG-APCD,Administrative,Permit To Operate,NA]; Status: Retired
   APCD2023-APP-007687 --> [LUEG-APCD,Permit App,Internal Combustion Engines,NA]; Status: Open
   APCD1987-APP-870337 --> [LUEG-APCD,Permit App,Internal Combustion Engines,NA]; Status: Approved
   APCD1987-APP-870337 --> [LUEG-APCD,Permit App,Vapor Recovery,EVR Phase II OTC]; Status: Approved
   APCD1996-APP-950987 --> [LUEG-APCD,Permit App,Degreasers,Cold Solvent LSA < 5 sq fl]; Status: Approved</li>
   APCD1998-APP-972325 --> [LUEG-APCD,Permit App,Vapor Recovery,EVR Phase II OTC]; Status: Approved
   APCD1998-APP-972325 --> [LUEG-APCD,Permit App,Vapor Recovery,EVR Phase II OTC]; Status: Approved
   APCD1998-APP-972325 --> [LUEG-APCD,Permit App,Vapor Recovery,EVR Phase II OTC]; Status: Approved
   APCD1998-APP-972325 --> [LUEG-APCD,Permit App,Vapor Recovery,EVR Phase II OTC]; Status: Approved
- **1.3 Facility Description:** Office building.
- **1.4 Other Background Info:** No hearing board actions, permit denials, legal settlements, NOV, or nuisance complaints. Not a Title V facility.

# **2.0 Process Description**

# 2.1 Equipment Description.

Emergency Diesel Engine: Manufacturer: John Deere, Model 6135HFG75A, S/N TBD, Maximum Rated Horsepower: 755 bhp, Model Year 2023, EPA Certification: Tier 2, Engine Family PJDXL13.5132, driving a 500-kW emergency electrical generator. Vertical exhaust with flapper-type raincap, 9.2 feet above ground.

# 2.2 Process Description.

This is a diesel powered generator to be used in situations of emergency and for limited operations for maintenance and testing purposes.

# 2.3 Emissions Controls.

This is a Tier 2 certified diesel engine.

# 2.4 Attachments.

Generator specification sheet

# **3.0 Emissions**

**3.1 Emissions estimate summary.** Estimated emissions from the process are shown below.

	Emission Factor	Hourly Emissions	Daily Emissions	Annual Em	issions
Compound	g/bhp-hr	lbs/hr	lbs/day	tons/year	lbs/yr
NOx	4.18	7.0	167	0.2	348
СО	0.45	0.7	18	0.02	37
NMHC	0.09	0.1	3.6	0.004	7.5
PM	0.03	0.05	1.2	0.001	2.5
SOx	_	0.008	0.18	0.0002	0.4

Table 1: Estimated Post Project PTE for criteria pollutants

# 3.2 Estimated Emissions Assumptions.

- Emission factors were EPA certified emission factors
- Calculations assume full load operation, one hour per day and total of 50 hours per year
- 15 ppmw sulfur fuel
- Standard toxics emission factors for diesel engines (see method E15).
- Other standard assumptions as stated in calculation sheets
- Expected actual emissions same as PTE

# **3.3 Emissions Calculations.**

Calculations were performed using the attached spreadsheets using standard calculation methods.

# **3.4 Attachments.**

Emission Calculations.

# 4.0 Applicable Rules

# **4.1 District Prohibitory Rules**

Emergency diesel engines at non-major sources are subject to the following District prohibitory rules: 50, 51, 53, 62 and 69.4.1. The proposed engine is expected to comply with all applicable requirements as shown in the table on the following page with standard permit conditions for this equipment type.

	Table 3: Prohibitory Rule Discussion					
Applicable Section	Requirement	Engine Complies?	Explanation	Condition		
	Visible Emissions not to exceed		Compliance with this requirement is achieved			
	20% opacity or Ringlemann 1 for more than 3 minutes in a 60		through the use of an EPA certified engine, and permit conditions will specify this			
Rule 50	minute period	Yes	requirement.	C28413		
Itule 00		105	Due to the intermittent operation of an	020113		
			emergency engine that meets all emission			
			requirements, it is anticipated that this will not			
			cause a public nuisance. Permit conditions			
	Cannot cause or contribute to a		will prohibit this engine from causing a public			
Rule 51	public nuisance	Yes	nuisance.	C28414		
	Emissions of sulfur compounds					
	calculated as SO2 on a dry basis		Permit conditions will require use of CARB			
	shall not exceed 0.05 % by volume		diesel fuel (15 ppm Sulfur by weight), which			
Rule 53	on a dry basis.	Yes	will ensure compliance with this requirement.	C28412		
			Permit conditions will require use of CARB			
	Sulfur content of liquid fuel shall		diesel fuel (15 ppm Sulfur by weight), which			
Rule 62	not exceed 0.5 % sulfur by weight.	Yes	will ensure compliance with this requirement.	C28412		
Rule 69.4.1						
	Emission standards for NOx and					
	CO emissions. For a new or					
	replacement certified diesel					
	engine, NOx emissions shall not					
	exceed: 3.5 g/bhp-hr if					
	50≤bhp<100; 3.0 g/bhp-hr if					
	100≤bhp<175; 3.0 g/bhp-hr if					
	175≤bhp<750; 4.8 g/bhp-hr if		Line of an EDA contified tion 2 and in a (tion 2 for			
	bhp≥750. For a new or		Use of an EPA certified tier 3 engine (tier 2 for			
	replacement certified diesel engine, CO emissions shall not		engines with a rated power in excess of 750 bhp) ensures that NOx emissions comply with			
69.4.1(d)(1)(ii)(E)	6	Yes	this requirement	NA		
07.7.1(u)(1)(l)(E)	1  CAUCUL $3.7  g/onp-m m$	105	uns requirement	ил		

50≤bhp<100; 3.7 g/bhp-hr if 100≤bhp<175; 2.6 g/bhp-hr if 175≤bhp<750; 2.6 g/bhp-hr if bhp≥750.			
Engines operated on diesel fuel shall use only California Diesel Fuel.	Yes	Permit conditions will require use of CARB diesel fuel (15 ppm Sulfur by weight), which will ensure compliance with this requirement.	C28412
All engines must be equipped with a non-resettable totalizing fuel or hour meter which shall be replaced in accordance with subsection (g)(7) of this rule.	Yes	Permit conditions will require installation of a non-resettable hour meter and specify the requirements for replacement.	C28419
The owner or operator must conduct specific maintenance on the engine and control equipment, including oil change/analysis, and checking hoses and belts. Maintenance is required according to engine/control equipment manufacturer's instructions or other written procedure, at least once each calendar year.	Yes	Annual maintenance of engine according to written procedure will be required by permit conditions.	C43433
Specifies engine information that must be maintained on-site.	Yes	Manufacturer and model number, brake horsepower rating, combustion method and fuel type are contained in the permit application. Documentation of CARB diesel fuel certification and manual of recommended maintenance will be specified in permit conditions.	C45251
Requires keeping an operating log containing dates and times and purpose of each period of engine operation, cumulative operation of engine for each calendar year and		Compliance with this provision is expected and this requirement is specified in permit	C45252
	100≤bĥp<175; 2.6 g/bĥp-hr if	100≤bhp<175; 2.6 g/bhp-hr if	100≤bhp<175; 2.6 g/bhp-hr if

	dates maintenance is performed.			
	Engines within 500 feet of schools			
	must record the time of day when			
	the engine is operated for testing			
	and maintenance. Specific records			
	for internal, external, and partial			
	external power outages is required.			
	Requires records of the dates and			
	times when fuel is being			
	combusted and cumulative			
	operating time if claiming a		The applicant has not claimed a	
<b>69.4.1</b> (g)(6)	commissioning exemption.	NA	commissioning period is needed.	NA
	Deswines notification to ADCD		Compliance with this provision is supported and	
	Requires notification to APCD		Compliance with this provision is expected and	
(0, 4, 1(-))(7)	within 10 calendar days of	V	this requirement is specified in permit	C29410
69.4.1(g)(7)	replacing an hour meter.	Yes	conditions.	C28419
	Requires specified records to be			
	maintained on-site for at least		Compliance with this provision is expected and	
	three years and made available to	* 7	this requirement is specified in permit	G 12 122
69.4.1(g)(9)	the District upon request.	Yes	conditions.	C43432
	Requires periodic source testing to			
	confirm compliance with		This subsection does not apply to certified	
<b>69.4.1</b> (i)(1)	applicable emission standards.	NA	emergency engines.	NA

# 4.2 New Source Review (NSR) Rule 20.1-20.4

This application is subject to District NSR rules. This site is considered a non-major stationary source, for each pollutant, as shown in the following table, and is therefore subject to District Rule 20.2. Calculation of emissions and determination of applicable requirements is performed in accordance with District Rule(s) 20.1 through 20.3.

|--|

	NOx	voc	PM-10	PM-2.5	SOx	СО	Lead
Major Source Threshold (ton/year)	50	50	100	100	100	100	100
Major Source? (yes/no)	No	No	No	No	No	No	No
Major Modification Threshold (ton/year)	25	25	15	10	40	100	0.6
Major Modification at a Major Source?	No	No	No	No	No	No	No
<b>Contemporaneous Calculations Performed?</b>	No	No	No	No	No	No	No
Federal Major Stationary Source Threshold (ton/year)							
(Severe non-attainment status)	25	25	100	100	100	100	100
Federal Major Stationary Source?	No	No	No	No	No	No	No
Federal Major Modification Threshold (ton/year)							
(Severe non-attainment status)	25	25	15	10	40	100	0.6
Federal Major Modification?	No	No	No	No	No	No	No
Contemporaneous Net Calculations Performed	No	No	No	No	No	No	No
PSD Threshold (ton/year)	250	250	250		250	250	
PSD Modification Threshold (ton/year)	40	40	15		40	100	0.6
PSD New or Modification?	No	No	No	No	No		No

District Rule 20.2 contains requirements for Best Available Control Technology (BACT), Air Quality Impact Assessment (AQIA), Prevention of Significant Deterioration (PSD) and public notification. No requirements of this rule apply as shown in the table on the following page.

Table 5: New Source Review Discussion						
Rule/Requirement	Requirement	Applicability	Discussion	Condition		
			This is not a major			
	Rule 20.2 applies to		source, so Rule 20.2			
Applicability	non-major sources	Yes	applies.	NA		
Type of	Replacement/Permi					
application	t Modification	NA	NA	NA		
	No exemptions					
	apply to this					
Exemptions	equipment	NA	NA	NA		
20.2(d)(1) - BACT						
	Installation of		The potential to emit for			
	BACT is required if	Triggered, see	this pollutant does exceed			
	emissions of NOx	discussion	this trigger level, so			
BACT - NOx	exceed 10 lbs/day	below	BACT is required.	NA		
	Installation of		The potential to emit for			
	BACT is required if	Not	this pollutant does not			
	emissions of VOC	Triggered, no	exceed this trigger level,			
BACT - VOC	exceed 10 lbs/day	permit limit	so BACT is not required.	NA		
	Installation of		The potential to emit for			
	BACT is required if	Not	this pollutant does not			
	emissions of PM-10	Triggered, no	exceed this trigger level,			
BACT - PM-10	exceed 10 lbs/day	permit limit	so BACT is not required.	NA		
	Installation of		The potential to emit for			
	BACT is required if	Not	this pollutant does not			
	emissions of SOx	Triggered, no	exceed this trigger level,			
BACT - SOx	exceed 10 lbs/day	permit limit	so BACT is not required.	NA		
20.2(d)(2) – AQIA						
	Required for					
	project emission		The increase in emissions			
	increases in excess		of this air contaminant			
	of 25 lbs/hr, 250		from this project does not			
	lbs/day or 40 ton/yr		exceed any of these			
	of NOx calculated		levels, so no AQIA is			
AQIA - NOx	as NO2	Not Triggered	required.	NA		
			The increase in emissions			
	Required for		of this air contaminant			
	project emission		from this project does not			
	increases in excess		exceed any of these			
	of 100 lbs/day or 15		levels, so no AQIA is			
AQIA - PM-10	ton/yr of PM-10	Not Triggered	required.	NA		
	Required for		<b></b>			
	project emission		The increase in emissions			
	increases in excess		of this air contaminant			
	of 25 lbs/hr, 250		from this project does not			
	lbs/day or 40 ton/yr		exceed any of these			
	of SOx calculated		levels, so no AQIA is			
AQIA - SOx	as SO2	Not Triggered	required.	NA		

	Required for		The increase in emissions	
	project emission		of this air contaminant	
	increases in excess		from this project does not	
	of 100 lbs/hr, 550		exceed any of these	
	lbs/day or 1000		levels, so no AQIA is	
AQIA - CO	ton/yr of CO	Not Triggered	required.	NA
	Applicable to			
	source that may		This is not a PSD source	
	have a significant		and emissions are not	
	impact on a class I		expected to impact a class	
20.2(d)(3) - PSD	area	NA	I area	NA
	Requires 30 day			
	public notice if an			
	AQIA was required			
	or if increase in		AQIA was not required	
	VOC emissions		and VOC emission	
	from the project		increase from this project	
20.2(d)(4) - Public	exceed 250 lbs/day		does not exceed these	
Notice	or 40 ton/year	NA	levels.	NA

(\*) BACT Analysis: A BACT Analysis for emergency engines greater than 750 hp was conducted for application APCD2021-APP-006981 and is presented below. As the proposed emergency engine is greater than 750 hp, this BACT evaluation is applicable to this application.

The PTE for NOx for each engine is 24.5 lb/day, greater than the 10 lb/day threshold for BACT. Alternatives that were considered include natural gas and propane engines and Tier 4f engines including SCR and DPF. Gas-fueled engines are not feasible as backup power for operations that must occur if natural gas lines are damaged in the event of an emergency like an earthquake. An engine of this size would also likely require SCR for emissions control, a method which is not cost effective as described below. The cost-effectiveness evaluation did not take into account the likely short periods of operation of this engine for maintenance. In many maintenance situations, the engine is operated at low loads and for approximately 30 minutes, some of which the SCR catalyst has not reached appropriate temperature for effectively controlling emissions.

A Tier 4f engine, the lowest-emitting category of diesel engines, would not be costeffective for this project. This emergency engine will only be allowed to run up to 50 hours per year for maintenance and testing, the maximum NOx emissions are 1224.5 lb/year for this specific engine model. However, using the emission standard for a tier 2 engine of this size, maximum NOx emissions would be 1468.4 lb/year. A representative from Hawthorne Cat estimated the cost of an EPA Tier 2 engine to be \$810,000 and the cost of an EPA Tier 4 final engine to be \$1,200,000. Assuming a control efficiency of 90%, the controlled NOx emissions would be 146.8 lb/year, with overall emission reduction being 1321.56 lb/year. The cost effectiveness is \$48.03 per pound of NOx reduced, exceeding the \$6.60/lb threshold. For emergency diesel engines over 750 bhp, *Tier 2 is considered BACT as there is no cost-effective, feasible alternative. Therefore, this engine satisfies all BACT requirements.* 

# 4.3 Toxic New Source Review – Rule 1200

District Rule 1200 applies to any application that is part of a project which results in an emission increase of toxic air contaminants. The rule limits the increase in acute and chronic health hazard index (HHI) to no more than one from the project and limits the increase in cancer risk from the project to no more than one in one million if the engine is not equipped with Toxics BACT (T-BACT) or no more than ten in one million if the project meets T-BACT requirements. The following table contains an in-depth review of Rule 1200 requirements. If a refined HRA was required, the HRA report is attached.

Question	Answer	Discussion
		The application does result in an increase in toxic
Does the application		emissions of specific trace heavy metals and organics (as
result in an increase in		shown in emission calculations section). See HRA for
toxic emissions?	Yes	detail.
Do any special		
exemptions apply to		
this equipment?	No	No exemptions apply to this equipment
Are there any other		
applications that are		
part of the project?	No	NA
What type of HRA was	Refined	
used?	HRA	
Is the Project Equipped		
with T-BACT?	No	NA
Cancer Risk increase		
(per one million)	<1	Meets standard of one.
Chronic HHI	<1	Meets standard of one.
Acute HHI	<1	Meets standard of one.
		Maintenance and testing (non-emergency operation) must
		be limited by permit conditions to 50 hours per calendar
Passes Rule 1200?	Yes	year.

Table 6a: Ru	le 1200	Applicable	Requirements	and Discussion
Table va. Ku		rippincable .	Requirements	and Discussion

Based on this analysis, the proposed engine complies with all applicable requirements of District Rule 1200.

# 4.4 AB3205

Requirements in the California Health and Safety Code in sections 42301.6 through 42301.9 (a.k.a. "AB3205 requirements") specify that prior to issuing an authority to construct for sources located within 1000 feet of a K-12 school, a 30-day public notification process must be conducted.

This project is located within 1000 feet of a school (SAITech at San Diego Job Corps), so public notice is required for this section.

# 4.5 State and Federal Regulations.

This engine is subject to both the State Air Toxic Control Measure for Stationary Engines (Stationary ATCM) and federal EPA issued National Emission Standards for Hazardous Air Pollutants (NESHAPs) and New Source Performance Standards (NSPS).

Applicable requirements of the Stationary ATCM include purchasing an engine certified to EPA standards and meeting specified emission standards of the rule, installing an hour meter, conducting maintenance according to a written plan, restrictions on operating the engine for purposes other than emergency use and limited (50 hours/year) use for maintenance and testing, and maintaining records to substantiate compliance with these requirements. This engine is expected to comply with all these requirements as described in the detailed analysis shown in the table following the discussion of NESHAP/NSPS requirements.

The NESHAP (subpart ZZZZ) requires that all new emergency engines comply with the rule by complying with the NSPS (subpart IIII). Applicable requirements of the NSPS include purchasing a certified engine, operating it as directed by the manufacturer, and maintaining records to substantiate compliance. These requirements closely mirror the ATCM requirements, except that the NSPS is somewhat less stringent in regards to allowable PM emission rate and contains some allowance for other types of operation not allowed by the ATCM. This means the more stringent ATCM requirements apply. A detailed analysis of NESHAP and NSPS requirements is shown in the following table.

Table 7a: State and Federal Requirement Discussion					
Applicable Section	Requirement	Engine Complies/Expect ed to Comply?	Explanation	Condition	
Stationary ATCM					
93115.3	There are no exemptions that apply to this engine	NA	This engine is not one of the engines exempted from any applicable requirements	NA	
	Definitions. Permit conditions ensure that the engine only operates in a manner allowed for engines designated as		Permit conditions require that the engine		
93115.4	"Emergency Standby"	Yes	operate only as an emergency engine	C40239	
	Requires the use of CARB diesel		Permit conditions will require use of CARB diesel fuel (15 ppm Sulfur by weight), which will ensure compliance		
93115.5	as fuel.	Yes	with this requirement.	C28412	
93115.6(a)(1)	Prohibits non-emergency operation of an emergency engine between 7:30 AM and 3:30 PM during school days if within 500 feet of school and during all school sponsored activities if located on school grounds	Yes	Permit conditions specify this requirement.	C28415	
<i>yellete(u)(l)</i>	Allows for engine to be started 30	100	Permit conditions specify this	020110	
93115.6(a)(2)	minutes prior to rotating outage	Yes	requirement.	C28560	
93115.6(a)(3)(A)(1)(b)	Requires that all engines used for emergency purposes be certified to at least tier 3 standards (tier 2 for engines with a rated power in excess of 750 bhp) and have	Yes	Use of an EPA certified tier 3 engine (tier 2 for engines with a rated power in excess of 750 bhp) with PM emission below this level satisfies this requirement	NA	

	Diesel PM emissions less than			
	0.15 g/bhp-hr			
	Restricts maintenance and testing			
	operation to no more than 50		Permit conditions specify this	
93115.6(a)(3)(A)(1)(c)	hours per calendar year	Yes	requirement.	C28643
	Does not allow emergency			
	standby engines to operate as part			
	of "demand response programs"			
	unless additional requirements are		Permit conditions specify this	
93115.6(c)	met	Yes	requirement.	C40907
	Requires that specified		The submitted application contained all	
	information is submitted to the		of the required contact/location	
	District as part of application		information, engine data, and emission	
93115.10(a)-(b)	package	Yes	information	NA
	Requires installation of a non-			
	resettable hour meter and for			
	engines with DPFs, a		Permit conditions require the	
	backpressure monitor that alerts		installation and use of a non-resettable	
	the operator when the		hour meter. Permit conditions require	
	backpressure limit of the engine		installation and use of a backpressure	
93115.10(d)	is approached	Yes	monitor between the engine and DPF.	C40721
	Specifies that the owner or			
	operator must keep records and			
	prepare a monthly summary of			
	hours of operation and purpose			
	(emergency, maintenance and			
	testing, emission testing, start-up		Permit conditions require that these	
	testing, other, demand response)		records be kept and the summary	
93115.10(f)	of each period of operation	Yes	updated monthly	C43431
			Permit conditions require that	
			documentation of the CARB diesel	
	Requires records of CARB diesel		certification for all fuel used be	
93115.10(f)	fuel certification	Yes	maintained	C43434

	States that records must be kept on-site for at least 24 months and		Compliance with this provision is	
	off-site for an additional 12		expected and this requirement is	
93115.10(f)	months (total 36 months)	Yes	specified in permit conditions.	C43432
	Allows the use of certification		The manufacturer's engine rating	
	data or other emission test data to		specific emission data was used to	
	demonstrate compliance with		determine compliance and for emission	
93115.13(a)	emission limits	Yes	calculations	NA
	For engines equipped with DPFs,			
	allows the use of an engine			
	certified to a PM-10 emission			
	level of no more than 0.15 g/bhp-			
	hr and a verified DPF in lieu of			
	source testing (or other alternative			
93115.13(f)	means as listed)	NA	Engine is not equipped with a DPF.	NA

Table 7a: State and Federal Requirement Discussion								
Applicable Section	Requirement	Engine Complies/Expected to Comply?	Explanation	Condition				
NESHAP ZZZZ								
40 CFR 63.6590(b)-(c) NSPS IIII	Requires that new emergency engines comply with the NESHAP by complying with the applicable NSPS	Yes	See NSPS section below.	NA				
40 CFR 60.4205	Requires that engines meet emission limits equivalent to tier 3 levels (tier 2 for engines 750 bhp or higher)	Yes	Use of an EPA certified tier 3 engine (tier 2 for engines with a rated power in excess of 750 bhp) satisfies this requirement	NA				
40 CFR 60.4207	Sets maximum fuel sulfur limits for fuel equivalent to CARB diesel requirements	Yes	Permit conditions will require use of CARB diesel fuel (15 ppm Sulfur by weight), which will ensure compliance with this requirement.	C28412				

			Permit conditions require the	
40 CEE (0.4000	Requires installation of a non-		installation and use of a non-resettable	<b>GO</b> (110
40 CFR 60.4209	resettable hour meter	Yes	hour meter.	C28419
	Requires that the engine be			
	operated according to			
	manufacturer's emission			
	related instructions and that no			
	changes are made to emission			
	related settings unless allowed		Permit conditions specify this	
40 CFR 60.4211(a)	by manufacturer	Yes	requirement.	C43433
	Requires that the engine be		Use of an EPA certified tier 3 engine	
	certified under EPA		(tier 2 for engines with a rated power in	
40 CFR 60.4211(c)	regulations	Yes	excess of 750 bhp)	NA
			Compliance ensured by permit	
			conditions for ATCM limiting operation	
			for maintenance and testing to no more	
			than 50 hours per calendar year and	
			restricting non-emergency operation for	
	Restricts operation of		only those uses allowed by the permit	C40239,
	emergency engines for non-		(maintenance and testing). ATCM	C40907,
40 CFR 60.4211(e)	emergency purposes	Yes	requirements more stringent than NSPS.	C28643
	Requires records of operation			
	to show that engine is operated		Compliance is expected and specified in	
40 CFR 60.4214(b)	as an emergency engine	Yes	permit conditions.	C43431
	For engines with DPFs,			
	requires records of corrective			
	actions taken when the high			
	backpressure limit is			
40 CFR 60.4214(c)	approached	NA	Engine is not equipped with a DPF.	NA
			Compliance with this provision is	
	Requires that all records be		expected and this requirement is	
40 CFR 60.7(f)	maintained for at least 2 years	Yes	specified in permit conditions.	C43432

# ENGINEERING EVALUATION ATTACHMENTS

# 4.6 Title V.

This is not a Title V facility therefore this requirement does not apply.

# **5.0 Recommendations**

This equipment is expected to comply with all rules and regulations, and therefore it is recommended, pending completion of the AB3205 noticing and comment process, that an authority to construct be issued with the following conditions.

# **6.0 Recommended Conditions**

Standard BEC APCD2020-CON-001647 with a 50 hour/year limit for nonemergency/maintenance and testing use.

Facility Name	LIC Dordor Dro	tastion Air	9 Marina
Facility Name:			& Marine
Application Number:	APCD2023-AP		
Site ID Number:			
Equipment Address:	1802 Saturn B		
	San Diego, CA	92154	
Contact Name:	Patrick Tam		
Contact Title:			
Contact Affiliation:	US Border Pro	otection Air	& Marine
Contact Number:	(714) 893-790	0	
Contact E-Mail:	tam@proehs.	com	
Project Engineer:	John Lee		
Make:	John Deere		
Model:	6135HFG75A		
	TBD		
Fuel Type:		1	
BHP Rating:	755		
Model Year:	2023		
Tier Level:	2		
Engine Family Number:	PJDXL13.5132		
Device Driven:	500 kW gener	ator	
NOx, g/BHP-hr:	4.18	5.60	g/kW-hr
CO, g/BHP-hr:	0.45	0.6	g/kW-hr
NMHC, g/BHP-hr:	0.09	0.12	g/kW-hr
PM10, g/BHP-hr:	0.03	0.04	g/kW-hr
-			1-
Fuel Usage, gal/hr:	35.5		
Operating Schedule, hrs/day:	24	4	
Operating Schedule, hrs/yr:	50		
		1	
Exhaust Flow Rate, cfm:			
Exhaust Temperature, °F:	975		
Stack Height above ground, ft:	9.2		
Stack Diameter, ft:	0.63		
No and the state of the	40		
Nearest School, ft:	40	525	ام
Residential Receptor, m:	163.07	535	ft
Occupational Receptor, m:	25.00	40	ft
Acute Receptor, m:	25.00	40	ft
Vortical Expansion (vac/za)	NOC	1	
Vertical Exhaust? (yes/no):	yes		
-lapper Valve? (flapper/raincap):	flapper		
Plot Plan? (yes/no): Flow Obstructions:	yes		

#### APPLICATION INFORMATION:

Applicant: US Border Protection A	ir & Marine Application	No.: APCD2023-APP-007687	ID No. APCD1987-SITE-07196
Equipment Address: 1802 Saturn Blvd San Diego, CA 92154	Engine N	lake: John Deere	Model Year: 2023
Device Driven: 500 kW generator	Engine M	odel: 6135HFG75A	Tier Level: 2
	Serial Nur	nber: TBD	Engine Family #: PJDXL13.5132
EMISSION INFORMATION:			
Engine Size: 755 BHP	Fuel Usage: 35.50 gal/l	er Heating Value: 137,0	00 Btu/gal
Operating Schedule: 24 hrs/day	days/wk	wks/yr	days/yr 50 hrs/yr

	Emission Factors				]	ſ		Control Equipment
	g/bhp-hr	g/kW-hr	lbs/bhp-hr <sup>2</sup>	lb/MMBtu <sup>2</sup>			Efficiency	Equipment
NOx	4.18	5.60	2.4E-02	3.10		NOx		
СО	0.45	0.60	5.3E-03	0.81		СО		
NMHC	0.09	0.12	7.3E-04	0.10		<i>NMHC</i>		
PM10	0.03	0.04	7.0E-04	0.07		PM10		
SOx			4.0E-03	0.05		SOx		

Notes: 1. g/bhp-hr and g/kW-hr guaranteed by engine manufacturer and/or  $\underline{EPA \ certification}$  (1 lb = 453.6 g)

2. other emission factors are from AP-42

3. lb/hp-hr limit is based on power output; lb/MMBtu is based on heat input

- 4. this 5th edition version AP-42 was published in 1995 when the sulfur content CA diesel was 500 ppm (0.05% by weight),
  - current sulfur content of CA diesel is 15 ppm; assume all sulfur in fuel is converted to SO  $_{\rm 2}$

#### EMISSIONS CALCULATIONS:

NOx =	4.2E+00	g/BHP-hr	x	755	bhj	2	x	lb/453.6 g	=	6.95	lbs/hr
CO =	4.5E-01	g/BHP-hr	x	755	bhj	)	x	lb/453.6 g	=	0.75	lbs/hr
NMHC =	9.0E-02	g/BHP-hr	x	755	bhj	2	x	lb/453.6 g	=	0.15	lbs/hr
PM10 =	3.0E-02	g/BHP-hr	x	755	bhj	2	x	lb/453.6 g	=	0.05	lbs/hr
SOx =	4.0E-03	lbs/BHP-hi	r x	755	bhj	2			=	3.02	lbs/hr
fuel usage: exhaust flow rate =	250 2,637			-				t gal/BHP, diese ЛВtu heat input)		sity is 7.05	lb/gal)
NOx =		ppm	x	158222	scfh	x		46 lbs NO2 / 3	85 scf =	0.00	lbs/hr
CO =		ppm	x	158222	scfh	x		28 lbs CO / 3	85 scf =	0.00	lbs/hr
VOC =		ррт	x	158222	scfh	x		16 lbs CH4 / 3	885 scf =	0.00	lbs/hr
Assume all	sulfur in f	uel is release	ed as SO2								
SO2 =	15	lb S/10 <sup>6</sup> I	b fuel x 7.05	lb fuel/go	35.5	0	gal/hr	x 64 lb SO2 /	32 lb S =	0.008	lbs/hr
								=		0.00003	percent by volume
NOx =	6.95	lbs/hr	÷	158222	scfh	x		385 scf / 46 lb	s NO2 =	367.8	ррт
CO =	0.75	lbs/hr	÷	158222	scfh	x		385 scf / 28 l	bs CO =	64.7	ррт
NMHC =	0.15	lbs/hr	÷	158222	scfh	x		385 scf / 16 lb	os CH4 =	22.7	ppm
<u>Grain Loading:</u>											

Calculated Fuel Usage: 250 lbs/hr (assume fuel consumption is 0.054 gal/BHP, diesel fuel density is 7.05 lb/gal)

exhaust flow rate = 158,222 dscfh (@ 12% CO2, assume engine exhaust is 231 dscf/lb fuel)

grain loading = 0.0022 grains/dscf

#### EMISSIONS SUMMARY:

	lbs/hr	lbs/day	tons/yr	lbs/yr
NOx	7.0	167	0.2	348
CO	0.7	18	0.02	37
NMHC	0.1	3.6	0.004	7.5
PM10	0.05	1.2	0.001	2.5
SOx	0.008	0.18	0.0002	0.4

	Sai	n Diego Air Pol	lution Control District		
	Su	pplemental Ap	plication Information		
		Rule 1200 T	oxics Evaluation		
	(ALL REQUESTED INF	ORMATION IS	IMPORTANT - PLEASE FILL B	LUE CELLS)	
Facility Name:	US Border Protection Air & Marine				
Equipment Location:	1802 Saturn Blvd San Diego, CA 9215	4			
Project Description:	Emergency Diesel Engine				
, , ,					
Control Equipment:					
Operating Schedule:	Hours per Day:	1	Weeks per Year:	50	

1

How are the emissions from this project released into the outdoor air? (Check all that apply)

Days per Week:

Point Source	Non-Point Source				
☑ Exhaust Stack or Duct	Passive Ventilation	Released through windows and/or roll-up doors	Fugitive Emissions		

#### Point Source

Parameter	Point Source #1	Point Source #2	Point Source #3
Height of release above ground (ft)	9.2		
Stack Diameter (or length x width) (ft)	0.63		
Exhaust Gas Temperature (°F) <sup>1</sup>	975		
Exhaust Gas Flow (ACFM)	3433		
Direction of Flow <sup>2</sup>	vertical		
Flow Obstruction <sup>3</sup>	no		
Distance to Nearest Property Line (+/- 10ft)	40.00		

Days per Year:

50

<sup>1</sup> Use "70 °F" or "Ambient" if unknown

<sup>2</sup> if "other" describe:

<sup>3</sup> if "other" describe:

AERIAL MAP AND FACILITY PLOT PLAN must be attached and labeled with Release Point(s) and Building(s) (includes facility and neighboring buildings within 5x the release height of a point source(s)).

Parameter	Building A	Building B	Building C	
Point Source(s)				
Point Source Location				
Building Length (ft) (optional)				
Building Width (ft) (optional)				
Building Height above ground (ft)				

San Diego APCD Use Only Additional Rule 1200 Submittal Information

Submittal Date:	4/17/2023	Site ID:	APCD1987-SITE-07196
Project Engineer:	John Lee	Appl. Number(s):	APCD2023-APP-007687
Fees Collected:		PTO No. (if existing):	

# Diesel IC Engine Screening Risk San Diego Air Pollution Control District Version 1.8 (Released June 9, 2020)

#### ##################

Facility ID:	APCD1987-SITE-07196
Facility Name:	US Border Protection Air & Marine
Application	APCD2023-APP-007687
Permit	TBD
Project Engineer:	John Lee

Notes:	-	
PARAMETER		RANGE REQUIRED
		FOR USE OF SCREENING TABLES
Does this project consist of a single engine?	yes	Yes
Is this application equipped with T-BACT?	No	
Maximum Rated Horsepower (bhp):	755	50 - 1500 bhp
Particulate Emission Factor (g/bhp-hr):	0.03	
Annual Usage (hours/year):	50	
Maximum Hourly Fuel Usage (gal/hr):	35.5	
Nearby Buildings Present?	Yes	Select Yes if within 100 Feet of Stack
Is the stack unobstructed and exhausts in a vertical direction?	Yes	Yes
Receptor Distances (meters)		
Residential <sup>1</sup>	163.07	25 meters or greater
Occupational <sup>2</sup>	25.00	25 meters or greater
Acute <sup>3</sup>	25.00	25 meters or greater

# Risk Estimates:

Cancer Risk (Residential): 1.33 in one million Cancer Risk (Occupational): 3.13 in one million

Acute HHI: 2.27

Please refer projects to the Toxics Section if:

- 1. Project consists of more than one engine.
- 2. Engine is not within the range required for this table, or
- 3. Risk estimates are greater than the allowable limits. For projects equipped with T-BACT, the allowable cancer risk is 10 in one million or less. For non-TBACT projects, the allowable cancer risk is one in one

million or less. For all projects, the allowable acute HHI is one or less.

If the projects passes R1200, please e-mail the completed form to the Toxics Section.

#### Notes:

- 1) Residential receptor distance is the distance between the stack and the nearest residence.
- 2) Occupational receptor distance is the distance between the stack and the nearest business.
- 3) Acute receptor distance is the distance between the stack and the nearest off-site location where extended (i.e. one-hour) public access is possible.

# Rule 1200 Health Risk Assessment

Facility Name:	US Border Protection Air & Marine
Facility ID:	APCD1987-SITE-07196
Application:	APCD2023-APP-007687
Project Engineer:	John Lee
Modeler:	Bill Reeve
Toxics Risk Analyst:	Andrew Bernabe
Date Completed by Toxics:	4/28/2023
HRA Tools Used:	Lakes-AERMOD (Version 22112)/HARP (v22118)

The following estimated risks are valid only for the input data provided by the Project Engineer.

Estimated worker risk does not exceed the residential risk. Therefore, only residential risk is presented in the following results.

# **Estimated Risk Levels:**

Maximum Individual Cancer Risk (Resident)	0.29 in one million
Chronic Noncancer Health Hazard Index (Resident)	= 7.66E-05
8-Hour Noncancer Health Hazard Index (Worker)	= NA*
Acute Health Hazard Index (**PMI)	$= 1.06 \text{E}{-}01$
*8-Hour Non-Cancer Health Hazard Index is only applica	ble when calculating worker
risk	
**Point of Maximum Impact	

The proposed application is for a stationary diesel emergency engine. The ARB Air Toxics Control Measure (ATCM) limits non-emergency operations to 50 hours per year.

# US Border, 07196 Application Number 007687 **Input Data Provided by Project Engineer:**

page 2 of 3 4/28/2023

Type of Source:	Emergency Diesel IC Engine.
Controls Description:	None.

# Worst-Case TAC Emissions Increase:

	Hourly Emission Rate	Annual Emission Rate			
Toxic Air Contaminant	(lb/hr)	(lb/yr)			
DIESEL PARTICULATE		2.48E+00			
ACETALDEHYDE	2.78E-02	1.39E+00			
ACROLEIN	1.20E-03	6.02E-02			
ARSENIC COMPOUNDS	5.68E-05	2.84E-03			
BENZENE	6.61E-03	3.31E-01			
BUTADIENE, 1,3-	7.70E-03	3.85E-01			
CADMIUM AND COMPOUNDS	5.33E-05	2.66E-03			
CHLOROBENZENE	7.10E-06	3.55E-04			
CHROMIUM (HEXAVALENT)	3.55E-06	1.78E-04			
COPPER AND COMPOUNDS	1.46E-04	7.28E-03			
ETHYL BENZENE	3.87E-04	1.93E-02			
FORMALDEHYDE	6.13E-02	3.06E+00			
HEXANE-N	9.55E-04	4.77E-02			
HYDROCHLORIC ACID	6.61E-03	3.31E-01			
LEAD & COMPOUNDS	2.95E-04	1.47E-02			
MANGANESE AND COMPOUNDS	1.10E-04	5.50E-03			
MERCURY AND COMPOUNDS	7.10E-05	3.55E-03			
NAPHTHALENE	6.99E-04	3.50E-02			
NICKEL AND NICKEL	1.38E-04	6.92E-03			
COMPOUNDS					
POLYCYCLIC AROM. HC (PAH)	1.29E-03	6.43E-02			
[Treat as B(a)P for HRA]	1.((E.02	9 <b>2</b> 0E 01			
PROPYLENE	1.66E-02	8.29E-01			
SELENIUM AND COMPOUNDS	7.81E-05	3.91E-03			
TOLUENE	3.74E-03	1.87E-01			
XYLENES	1.51E-03	7.53E-02			

Source: Acute TACs – Ventura County, 5/17/01.

Diesel particulate exhaust is a surrogate for all toxic air contaminant annual emissions from diesel-fueled engines when determining the potential cancer risk and noncancer chronic hazard index. Speciated toxic air contaminant hourly emissions are used when determining the potential noncancer acute hazard index.

US Border, 07196 Application Number 007687 **Process Data:** 

<b>Operation Parameter</b>	Value
Diesel particulate emission factor (g/hp-hr)	0.03
Engine horsepower (bhp)	755
Fuel Consumption (gal/hr)	35.5
Annual hours of operation	50

# **Release Parameters:**

Exhaust Flow Rate, cfm:	3433
Exhaust Temperature, °F:	975
Stack Height above ground, ft:	9.2
Stack Diameter, ft:	0.63

# Discussion

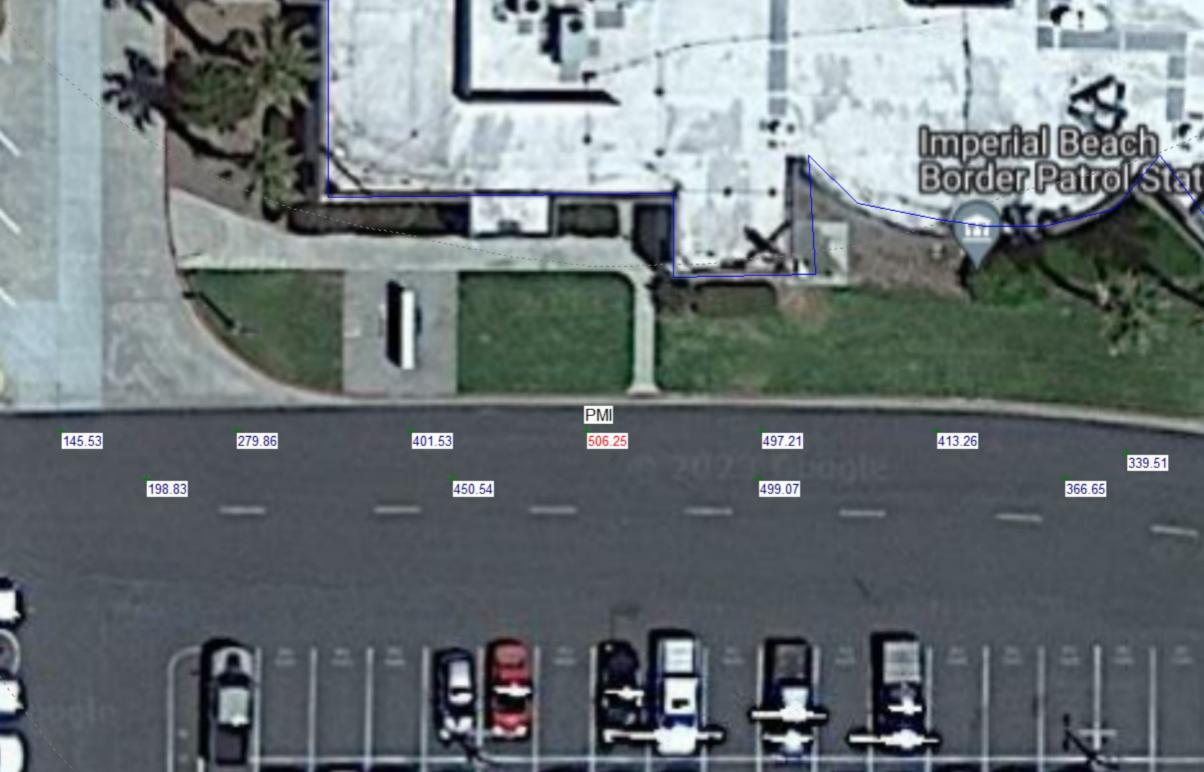
The HRA was conducted in accordance with EPA and OEHHA guidance and District standard procedures. A point source was modeled with refined air dispersion modeling using EPA's AERMOD model, AERMET (Version 22112) processed Chula Vista 2010/2012 sigma theta updated meteorology data, AERMAP terrain processing, and rural dispersion coefficients. Building downwash effects were calculated using the EPA BPIP-Prime model. The receptor grid was sufficiently dense to identify maximum impacts.

Since there is no school within a 1 in one million residential cancer risk isopleth, a fraction of time (FAH) was applied to ages less than 16 years.

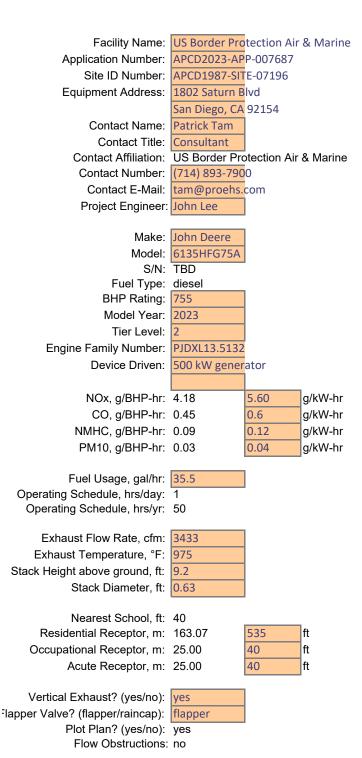
These risk results are based on the risk scenario calculations and health data at the time of the review, and should not be scaled with revised emissions rates without consulting with the Toxics Section.

Cancer INDEX	GRP1 1 Engine	GRP2	-	POLABBRE DieselExhF			SCENARIO DETAI 30YrCance *	LS INH_RISK 2.85E-07
Chronic								
INDEX	GRP1	GRP2	POLID	POLABBRE	CONC	SCENARIO	RESP	
	1 Engine		9901	DieselExhF	0.000383	NonCance	7.66E-05	
Acute								
INDEX	GRP1	GRP2	POLID	POLABBRE	CONC	SCENARIO	EYE	
	1 Engine		9901	DieselExhF	0	NonCance	0.00E+00	
	2 Engine			Acetaldeh		NonCance		
	3 Engine		107028	Acrolein	0.0768	NonCance	3.07E-02	
	4 Engine		7440382	Arsenic	0.00362	NonCance	0.00E+00	
	5 Engine		71432	Benzene	0.422	NonCance	0.00E+00	
	6 Engine		106990	1,3-Butadi	0.491	NonCance	0.00E+00	
	7 Engine		7440439	Cadmium	0.0034	NonCance	0.00E+00	
	8 Engine		108907	Chloroben	0.000453	NonCance	0.00E+00	
	9 Engine		18540299	Cr(VI)	0.000226	NonCance	0.00E+00	
	10 Engine		7440508	Copper	0.00929	NonCance	0.00E+00	
	11 Engine		100414	Ethyl Benz	0.0247	NonCance	0.00E+00	
	12 Engine		50000	Formaldeł	3.91	NonCance	7.11E-02	
	13 Engine		110543	Hexane	0.0609	NonCance	0.00E+00	
	14 Engine		7647010	HCI	0.422	NonCance	2.01E-04	
	15 Engine		7439921	Lead	0.0188	NonCance	0.00E+00	
	16 Engine		7439965	Manganes	0.00702	NonCance	0.00E+00	
	17 Engine		7439976	Mercury	0.00453	NonCance	0.00E+00	
	18 Engine		91203	Naphthale	0.0446	NonCance	0.00E+00	
	19 Engine		7440020	Nickel	0.00883	NonCance	0.00E+00	
	20 Engine		1151	PAHs-w/o	0.082	NonCance	0.00E+00	
	21 Engine		115071	Propylene	1.06	NonCance	0.00E+00	
	22 Engine		7782492		0.00498	NonCance	0.00E+00	
	23 Engine		108883	Toluene		NonCance		
	24 Engine		1330207		0.096	NonCance	4.36E-06	
	-			-			1.06E-01	





FACILITY NAME:	LIS Border P	rotection Air	& Marine					
	US Doldel 1		& Marine					
Fuel Consumption (gal/hr):	35.50							
Diesel Particulate Emission Factor (g/hp-hr):	0.02984							
Brake Horsepower (hp):	755			Annual Receptor Type: Resident				
Annual Hours of Operation (hrs):	50		ANNUAI	DISPERSIO	N FACTOR (	µg/m3)/(g/s):	10.7	
					Di	stance (m):		
FACILITY ID:	APCD1987-9	SITE-07196		Hourly Rec	eptor Type:	PMI	•	
APPLICATION NO.:	APCD2023-A	APP-007687	HOURLY	DISPERSIO	N FACTOR (	µg/m3)/(g/s):	506.3	
ENGINEER:	John Lee				Di	stance (m):		
	Emission	Acute	Annual	Acute	Annual	Hourly	Annual	
CHEMICAL NAME	Factor	Emission	Emission	Emissions	Emission	GLC	GLC	
		Rate	Rate	Rate	Rate			
	lb/1000 gal	lb/hr	lb/yr	g/s	g/s	µg/m°	µg/m°	
DIESEL PARTICULATE			2.48E+00		3.57E-05		3.83E-04	
ACETALDEHYDE	7.83E-01	2.78E-02	1.39E+00	3.50E-03		1.77E+00		
ACROLEIN	3.39E-02	1.20E-03	6.02E-02	1.52E-04		7.68E-02		
ARSENIC COMPOUNDS	1.60E-03	5.68E-05	2.84E-03	7.16E-06		3.62E-03		
BENZENE	1.86E-01	6.61E-03	3.31E-01	8.33E-04		4.22E-01		
BUTADIENE, 1,3-	2.17E-01	7.70E-03	3.85E-01	9.71E-04		0.491436		
CADMIUM AND COMPOUNDS	1.50E-03	5.33E-05	2.66E-03	6.71E-06		3.40E-03		
CHLOROBENZENE	2.00E-04	7.10E-06	3.55E-04	8.95E-07		4.53E-04		
CHROMIUM (HEXAVALENT)	1.00E-04	3.55E-06	1.78E-04	4.47E-07		2.26E-04		
COPPER AND COMPOUNDS	4.10E-03	1.46E-04	7.28E-03	1.83E-05		9.29E-03		
ETHYL BENZENE	1.09E-02	3.87E-04	1.93E-02	4.88E-05		2.47E-02		
FORMALDEHYDE	1.73E+00	6.13E-02	3.06E+00	7.72E-03		3.91E+00		
HEXANE-N	2.69E-02	9.55E-04	4.77E-02	1.20E-04		6.09E-02		
HYDROCHLORIC ACID	1.86E-01	6.61E-03	3.31E-01	8.33E-04		4.22E-01		
LEAD & COMPOUNDS	8.30E-03	2.95E-04	1.47E-02	3.71E-05		1.88E-02		
MANGANESE AND COMPOUNDS	3.10E-03	1.10E-04	5.50E-03	1.39E-05		7.02E-03		
MERCURY AND COMPOUNDS (INORGANIC)	2.00E-03	7.10E-05	3.55E-03	8.95E-06		4.53E-03		
NAPHTHALENE	1.97E-02	6.99E-04	3.50E-02	8.81E-05		4.46E-02		
NICKEL AND NICKEL COMPOUNDS	3.90E-03	1.38E-04	6.92E-03	1.74E-05		8.83E-03		
POLYCYCLIC AROM. HC (PAH) [Treat as B(a)P for	3.62E-02	1.29E-03	6.43E-02	1.62E-04		8.20E-02		
PROPYLENE	4.67E-01	1.66E-02	8.29E-01	2.09E-03		1.06E+00		
SELENIUM AND COMPOUNDS	2.20E-03	7.81E-05	3.91E-03	9.84E-06		4.98E-03		
TOLUENE	1.05E-01	3.74E-03	1.87E-01	4.71E-04		2.39E-01		
XYLENES	4.24E-02	1.51E-03	7.53E-02	1.90E-04		9.60E-02		



NOx, g/BHP-hr: + NMHC, g/BHP-hr: 4.27

		San Diego Air Pollu	tion Control District				
	Supplemental Application Information						
Rule 1200 Toxics Evaluation							
(ALL REQUESTED INFORMATION IS IMPORTANT - PLEASE FILL BLUE CELLS)							
Facility Name:	Facility Name: US Border Protection Air & Marine						
Equipment Location:	Location: 1802 Saturn Blvd San Diego, CA 92154						
Project Description:	Emergency Diesel Engine						
Control Equipment:	None						
Operating Schedule:	Hours per Day:	1	Weeks per Year:	50			
	Days per Week:	1	Days per Year:	50			

#### RELEASE POINT DATA

How are the emissions from this project released into the outdoor air? (Check all that apply)

Point Source		Non-Point Source		
Exhaust Stack	Passive Ventilation	Released through windows and/or roll-up doors	Fugitive Emissions	

Point Source

Parameter	Point Source #1	Point Source #2	Point Source #3
Height of release above ground (ft)	9.2		
Stack Diameter (or length x width) (ft)	0.63		
Exhaust Gas Temperature (°F) <sup>1</sup>	975		
Exhaust Gas Flow (ACFM)	3433		
Direction of Flow <sup>2</sup>	vertical		
Flow Obstruction <sup>3</sup>	no		
Distance to Nearest Property Line ( +/- 10ft)	40.00		

<sup>1</sup> Use "70 °F" or "Ambient" if unknown

<sup>2</sup> if "other" describe:

<sup>3</sup> if "other" describe:

AERIAL MAP AND FACILITY PLOT PLAN must be attached and labeled with Release Point(s) and Building(s) (includes facility and neighboring buildings within 5x the release height of a point source(s)).

Parameter	Building A	Building B	Building C
Point Source(s)			
Point Source Location			
Building Length (ft) (optional)			
Building Width (ft) (optional)			
Building Height above ground (ft)			

#### San Diego APCD Use Only

Additional Rule 1200 Submittal Information

Submittal Date:	4/17/2023	Site ID:	APCD1987-SITE-07196
Project Engineer:	John Lee	Appl. Number(s):	APCD2023-APP-007687
Fees Collected:		PTO No. (if existing):	

★ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\* C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje \*\*\* 04/27/23 \*\*\* AERMET - VERSION 22112 \*\*\* \*\*\* \*\*\* 16:41:46 PAGE 1 \*\*\* MODELOPTs: RegDFAULT CONC ELEV RURAL SigA Data \*\*\* \*\*\* MODEL SETUP OPTIONS SUMMARY SO STARTING \*\* Source Location \*\* \*\* Source ID - Type - X Coord. - Y Coord. \*\* LOCATION STCK1 POINT 490479.000 3603264.650 12.120 \*\* Source Parameters \*\* SRCPARAM STCK1 1.0 2.804 797.039 55.945624513482 0.192024 \*\* Model Options Selected: \* Model Uses Regulatory DEFAULT Options \* Model Is Setup For Calculation of Average CONCentration Values. \* NO GAS DEPOSITION Data Provided. \* NO PARTICLE DEPOSITION Data Provided. \* Model Uses NO DRY DEPLETION. DDPLETE = F \* Model Uses NO WET DEPLETION. WETDPLT = F \* Stack-tip Downwash. \* Model Accounts for ELEVated Terrain Effects. \* Use Calms Processing Routine. \* Use Missing Data Processing Routine. \* No Exponential Decay. \* Model Uses RURAL Dispersion Only. \* CCVR\_Sub - Meteorological data includes CCVR substitutions \* TEMP Sub - Meteorological data includes TEMP substitutions \* Model Assumes No FLAGPOLE Receptor Heights. \* The User Specified a Pollutant Type of: OTHER \*\*Model Calculates 1 Short Term Average(s) of: 1-HR and Calculates PERIOD Averages \*\*This Run Includes: 1 Source(s); 1 Source Group(s); and 17928 Receptor(s) with: 1 POINT(s), including 0 POINTCAP(s) and 0 POINTHOR(s) 0 VOLUME source(s) and: 0 AREA type source(s) and: and: 0 LINE source(s) 0 RLINE/RLINEXT source(s) and: 0 OPENPIT source(s) and: and: 0 BUOYANT LINE source(s) with a total of 0 line(s) 0 SWPOINT source(s) and:

\*\*Model Set To Continue RUNning After the Setup Testing.

\*\*The AERMET Input Meteorological Data Version Date: 22112 \*\*Output Options Selected: Model Outputs Tables of PERIOD Averages by Receptor Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword) Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword) Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword) \*\*NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours m for Missina Hours b for Both Calm and Missing Hours \*\*Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 53.00 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0 Emission Units = GRAMS/SEC: Emission Rate Unit Factor = 0.10000E+07 Output Units = MICROGRAMS/M\*\*3 \*\*Approximate Storage Requirements of Model = 5.5 MB of RAM. \*\*Input Runstream File: aermod.inp \*\*Output Print File: aermod.out \*\*Detailed Error/Message File: 7687\_Border.err \*\*File for Summary of Results: 7687 Border.sum ★ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\* C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje \*\*\* 04/27/23 \*\*\* AERMET - VERSION 22112 \*\*\* \*\*\* 16:41:46 PAGE 2 \*\*\* MODELOPTs: RegDFAULT CONC ELEV RURAL SigA Data \*\*\* METEOROLOGICAL DAYS SELECTED FOR PROCESSING \*\*\* (1=YES: 0=NO)1111111111 11111 NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

#### \*\*\* UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES \*\*\* (METERS/SEC)

1.54, 3.09, 5.14, 8.23, 10.80,

★ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\* C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje \*\*\* \*\*\* AERMET - VERSION 22112 \*\*\* \*\*\* \*\*\*

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#### \*\*\* UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA \*\*\*

..\..\Meteorology Documents\AERMET Files\AERMET 22112 PROJECTS\CVA\CVA\_2010\_2 Surface file: Met Version: 22112 ...\...\Meteorology Documents\AERMET Files\AERMET 22112 PROJECTS\CVA\CVA\_2010\_2 Profile file: Surface format: FREE Profile format: FREE Surface station no.: 23188 3190 Upper air station no.: Name: SAN\_DIEGO/LINDBERGH\_FIELD Name: UNKNOWN Year: 2010 Year: 2010 First 24 hours of scalar data YR MO DY JDY HR U\* W\* DT/DZ ZICNV ZIMCH M-O LEN ZO BOWEN ALBEDO REF WS HT REF TA HT H0 WD 10 01 01 1 01 -1.0 0.031 -9.000 -9.000 -999. 13. 2.6 0.03 0.98 1.00 0.89 48. 10.0 283.1 10.0 -1.0 0.030 -9.000 -9.000 -999. 2.6 0.03 0.98 0.89 62. 10.0 283.1 10 01 01 1 02 13. 1.00 10.0 -1.0 0.031 -9.000 -9.000 -999. 10 01 01 1 03 13. 2.6 0.03 0.98 1.00 0.89 45. 10.0 282.5 10.0 -1.0 0.030 -9.000 -9.000 -999. 79. 10.0 281.9 10 01 01 1 04 13. 2.6 0.03 0.98 1.00 0.89 10.0 -0.2 0.015 -9.000 -9.000 -999. 10 01 01 1 05 1.3 0.03 0.98 1.00 356. 10.0 280.8 4. 0.44 10.0 10 01 01 1 06 -1.0 0.031 -9.000 -9.000 -999. 13. 2.6 0.03 0.98 1.00 0.89 45. 10.0 280.8 10.0 1 07 -0.8 0.031 -9.000 -9.000 -999. 47. 10.0 281.9 10 01 01 13. 3.3 0.03 0.98 1.00 0.89 10.0 -0.6 0.030 -9.000 -9.000 -999. 13. 4.3 0.03 0.98 78. 10.0 282.5 10 01 01 1 08 0.49 0.89 10.0 1 09 19.1 0.086 0.293 0.014 47. 0.98 0.89 24. 10.0 286.4 10 01 01 61. -3.1 0.03 0.30 10.0 10 01 01 1 10 60.3 0.098 0.561 0.010 106. 73. -1.4 0.03 0.98 0.23 0.89 351. 10.0 288.1 10.0 10 01 01 1 11 59.0 0.158 0.715 0.009 224. 150. -6.0 0.03 0.98 0.21 1.78 311. 10.0 290.8 10.0 67.1 0.189 0.858 0.008 341. 197. 313. 10.0 292.5 10 01 01 1 12 -9.1 0.03 0.98 0.20 2.23 10.0 1 13 66.4 0.159 0.922 0.008 427. 153. -5.5 0.03 0.98 1.78 305. 10.0 293.6 10 01 01 0.20 10.0 57.3 0.187 0.919 0.008 490. 193. 2.23 278. 10.0 294.8 10 01 01 1 14 -10.2 0.03 0.98 0.21 10.0 38.8 0.237 0.827 0.008 526. 1 15 277. -31.0 0.03 0.98 0.24 3.12 289. 10.0 293.1 10 01 01 10.0 -22.7 0.03 10 01 01 1 16 20.7 0.173 0.678 0.008 543. 174. 0.98 0.33 2.23 296. 10.0 291.4 10.0 10 01 01 1 17 -1.5 0.046 -9.000 -9.000 -999. 46. 5.7 0.03 0.98 0.60 1.34 337. 10.0 291.4 10.0 -1.6 0.046 -9.000 -9.000 -999. 10.0 290.3 10 01 01 1 18 23. 5.4 0.03 0.98 1.00 1.34 337. 10.0 1 19 -0.2 0.015 -9.000 -9.000 -999. 252. 10.0 288.6 10 01 01 5. 1.8 0.03 0.98 1.00 0.44 10.0 10 01 01 1 20 -0.2 0.015 -9.000 -9.000 -999. 4. 1.8 0.03 0.98 113. 10.0 287.5 1.00 0.44 10.0 -0.8 0.030 -9.000 -9.000 -999. 122. 10 01 01 1 21 13. 3.3 0.03 0.98 1.00 0.89 10.0 286.9 10.0 -2.1 0.046 -9.000 -9.000 -999. 23. 10.0 286.4 10 01 01 1 22 4.0 0.03 0.98 1.00 1.34 99. 10.0 1 23 -1.0 0.030 -9.000 -9.000 -999. 2.6 0.03 10.0 285.3 10 01 01 13. 0.98 1.00 0.89 331. 10.0 10 01 01 1 24 -1.0 0.031 -9.000 -9.000 -999. 13. 2.6 0.03 0.98 1.00 0.89 40. 10.0 285.3 10.0 First hour of profile data YR MO DY HR HEIGHT F WDIR WSPD AMB\_TMP sigmaA sigmaW sigmaV 0.89 283.2 30.0 -99.00 10 01 01 01 10.0 1 48. 0.41

F indicates top of profile (=1) or below (=0) ★ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\* C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje \*\*\* 04/27/23 \*\*\* AERMET - VERSION 22112 \*\*\* \*\*\* \*\*\* 16:41:46

\*\*\* MODELOPTs: RegDFAULT CONC ELEV RURAL SigA Data PAGE 4

\*\*\* THE SUMMARY OF MAXIMUM PERIOD ( 26304 HRS) RESULTS \*\*\* \*\* CONC OF OTHER IN MICROGRAMS/M\*\*3 \*\* NETWORK GROUP ID AVERAGE CONC RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE GRID-ID ALL 1ST HIGHEST VALUE IS 12.17883 AT ( 490553.35, 3603277.52, 12.15, 12.15, 0.00) DC 2ND HIGHEST VALUE IS 12.04146 AT ( 490563.24, 3603277.55, 12.21, 12.21, 0.00) DC 3RD HIGHEST VALUE IS 11.98428 AT ( 490543.46, 3603277.49, 12.12, 12.12, 0.00) DC 4TH HIGHEST VALUE IS 11.69664 AT ( 490573.13, 3603277.58, 12.29, 12.29, 0.00) DC 5TH HIGHEST VALUE IS 11.26197 AT ( 490533.57, 3603277.46, 12.10, 12.10, 0.00) DC 11.22084 AT ( 490583.02, 3603277.61, 6TH HIGHEST VALUE IS 12.35, 12.35, 0.00) DC 7TH HIGHEST VALUE IS 10.72391 AT ( 490562.50, 3603288.50, 12.63, 12.63, 0.00) DC 8TH HIGHEST VALUE IS 10.66759 AT ( 490592.91, 3603277.64, 12.40, 12.40, 0.00) DC 10.57546 AT ( 490577.50, 3603288.50, 9TH HIGHEST VALUE IS 12.68, 12.68, 0.00) DC 10TH HIGHEST VALUE IS 10.20861 AT ( 490547.50, 3603288.50, 12.52, 12.52, 0.00) DC \*\*\* RECEPTOR TYPES: GC = GRIDCART GP = GRIDPOLRDC = DISCCART DP = DISCPOLR★ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\* C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje \*\*\* \*\*\* AERMET - VERSION 22112 \*\*\* \*\*\* \*\*\* \*\*\* MODELOPTs: RegDFAULT CONC ELEV RURAL SigA Data \*\*\* THE SUMMARY OF HIGHEST 1-HR RESULTS \*\*\* \*\* CONC OF OTHER IN MICROGRAMS/M\*\*3 \*\* DATE GROUP ID AVERAGE CONC RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE GRID-ID (YYMMDDHH) HIGH 1ST HIGH VALUE IS 506.25175 ON 12092623: AT ( 490509.05, 3603170.84, 12.16, 12.16, 0.00) DC ALL \*\*\* RECEPTOR TYPES: GC = GRIDCART GP = GRIDPOLRDC = DISCCARTDP = DISCPOLR

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NETWORK

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★ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\* C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje \*\*\* 04/27/23 \*\*\* AFRMET - VERSTON 22112 \*\*\* \*\*\* \*\*\* 16:41:46 PAGE 6

\*\*\* MODELOPTs: RegDFAULT CONC ELEV RURAL SigA Data

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages ------

A Total of 0	Fatal E	Error Mess	sage(s)
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- 2 Warning Message(s) 456 Informational Message(s) A Total of
- A Total of
- A Total of 26304 Hours Were Processed
- A Total of 161 Calm Hours Identified
- A Total of 295 Missing Hours Identified ( 1.12 Percent)

\*\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*\*\*

\*\*\* NONE \*\*\*

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*\*

SO W320	37	PPARM: Input Parameter May Be Out-of-Range for Parameter	VS
MX W403	99	PFLCNV: Turbulence data is being used w/o ADJ_U* option	SigA Data

HARP2 - HRACalc (dated 22118) 4/28/2023 4:28:13 PM - Output Log

GLCs loaded successfully Pollutants loaded successfully RISK SCENARIO SETTINGS

Receptor Type: Resident Scenario: All Calculation Method: Derived

EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: -0.25 Total Exposure Duration: 30

Exposure Duration Bin Distribution 3rd Trimester Bin: 0.25 0<2 Years Bin: 2 2<9 Years Bin: 0 2<16 Years Bin: 14 16<30 Years Bin: 14 16 to 70 Years Bin: 0

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*****
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PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments. The remaining pathways are only used for cancer and noncancer chronic assessments.

Inhalation: True Soil: True Dermal: True Mother's milk: True Water: False Fish: False Homegrown crops: False Beef: False Dairy: False Pig: False Chicken: False Egg: False

Daily breathing rate: RMP

\*\*Worker Adjustment Factors\*\* Worker adjustment factors enabled: NO \*\*Fraction at time at home\*\* 3rd Trimester to 16 years: OFF 16 years to 70 years: ON

\*\*\*\*\*

SOIL & DERMAL PATHWAY SETTINGS

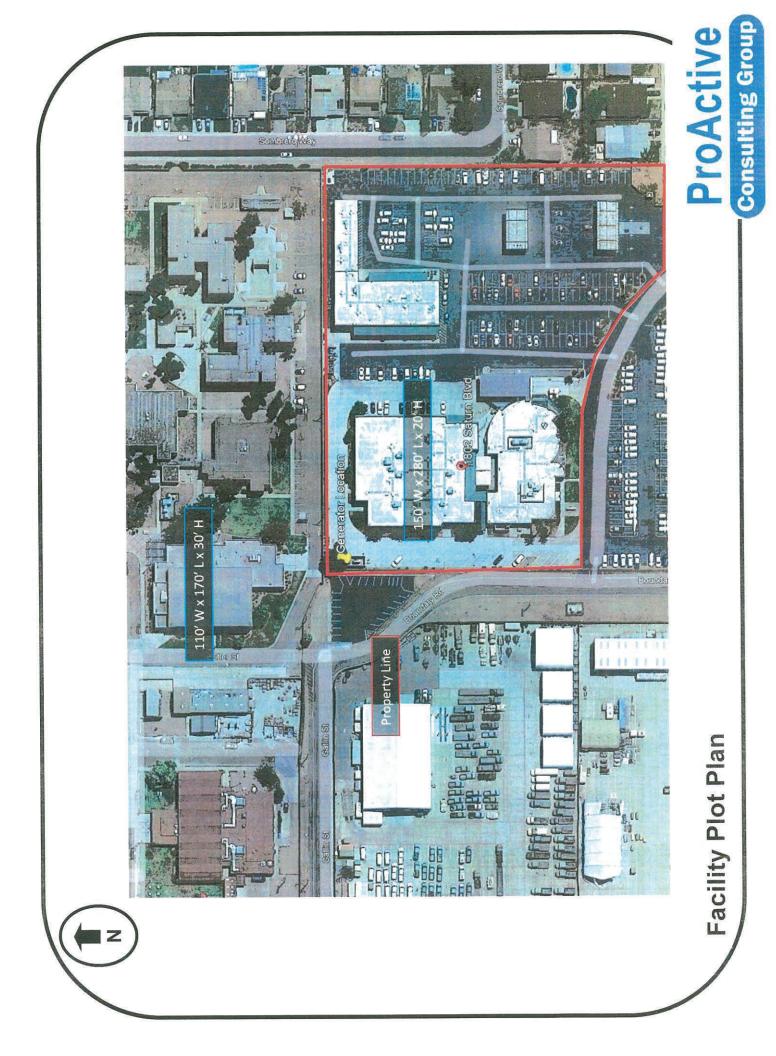
Deposition rate (m/s): 0.05 Soil mixing depth (m): 0.01 Dermal climate: Warm

\*\*\*\*\*

TIER 2 SETTINGS Tier2 not used.

\*\*\*\*\*

Calculating cancer risk Cancer risk saved to: C:\Users\abernabe\Desktop\7687 US Border\Risk\ResidentCancerRisk.csv Calculating chronic risk Chronic risk saved to: C:\Users\abernabe\Desktop\7687 US Border\Risk\ResidentNCChronicRisk.csv Calculating acute risk Acute risk saved to: C:\Users\abernabe\Desktop\7687 US Border\Risk\ResidentNCAcuteRisk.csv HRA ran successfully



# Bernabe, Andrew

From:	Swaney, Jim
Sent:	Thursday, April 27, 2023 4:53 PM
То:	Bernabe, Andrew
Cc:	Lee, John
Subject:	FW: HRA request: APCD2023-APP-007687
Attachments:	propertyLine_buildingDimension.pdf; APCD2023-APP-007687_Calculations.xlsm

Andrew, this has been assigned to you.

From: Reeve, Bill <Bill.Reeve@sdapcd.org>
Sent: Thursday, April 27, 2023 4:48 PM
To: Amberg, Stephen <Stephen.Amberg@sdapcd.org>; Bernabe, Andrew <Andrew.Bernabe@sdapcd.org>; Canter,
Adam <Adam.Canter@sdapcd.org>; DiFulvio, Jaime <Jaime.DiFulvio@sdapcd.org>; Nguyen, Tony
<Tony.Nguyen2@sdapcd.org>; Ossowski, Peter <Peter.Ossowski@sdapcd.org>; Swaney, Jim <Jim.Swaney@sdapcd.org>;
Wong, Benjamin <Benjamin.Wong@sdapcd.org>
Cc: Lee, John <John.Lee@sdapcd.org>
Subject: FW: HRA request: APCD2023-APP-007687

I have completed the modeling for US Border. The modeling zip file is in <u>7687\_US Border</u>

-Bill

Bill Reeve Associate Meteorologist San Diego County Air Pollution Control District Bill.Reeve@sdapcd.org O 858-586-2773 M 858-945-3732 http://www.sdapcd.org 10124 Old Grove Rd, San Diego CA, 92131

From: Lee, John <John.Lee@sdapcd.org>
Sent: Monday, April 17, 2023 1:19 PM
To: Reeve, Bill <<u>Bill.Reeve@sdapcd.org</u>>; Nguyen, Tony <<u>Tony.Nguyen2@sdapcd.org</u>>
Cc: Canter, Adam <<u>Adam.Canter@sdapcd.org</u>>; DiFulvio, Jaime <<u>Jaime.DiFulvio@sdapcd.org</u>>; Swaney, Jim
<<u>Jim.Swaney@sdapcd.org</u>>
Subject: HRA request: APCD2023-APP-007687

Hello Bill and Tony,

Here is an HRA request. Please have the modeler post the results in <u>7687\_US Border</u>.

Let me know if you need more information.

Thank you,

John L.