ENGINEERING EVALUATION
AUTHORITY TO CONSTRUCT

Facility Name:	Allied Recycling
Application #:	APCD2025-APP-008632
Equipment Type:	34D – Non-Emergency Diesel Engine
ID#:	APCD2025-SITE-04741
Equipment/Facility Address:	1425 N Magnolia Ave El Cajon CA 92020
Facility Contact:	Dave Wojczynski, Owner 619-390-6637 alliedrecycling1@gmail.com
Applicant Contact:	Kyle Neal (619) 390-1418 kylenealscrap@gmail.com
Permit Engineer:	X Hawzhin Muhamed Hawzhin Muhamed Assistant APC Engineer Signed by: E089831
Senior Engineer Signature:	X Joseph N. Herzig Senior APC Engineer

1.0 Background

1.1 Type of Application: Prime diesel engine/ change of location.

1.2 Permit History: This permit (APCD2022-PTO-004413) was issued in 2022 for a prime diesel engine powering a shear baler logger hydraulic system. This application was submitted to change of location for an existing permitted prime engine from currently permitted location at 1315 Lee Dr, Vista, CA 92083 to a new location at 1425 N Magnolia Ave, El Cajon CA 92020. The engine and the shear baler system, although

portable, will reside at the same location for more than 12 months, therefore, for the purpose of ATCM, should be considered as stationary.

1.3 Facility Description: Scrap metal recycling facility. This facility has another application with SDAPCD at another site that will be replaced with this application – No other applications are open at this site.

1.4 Other Background Info: There are no open hearing board actions, permit denials, legal settlements, NOV, or nuisance complaints. This is not a Title V facility.

2.0 Process Description

2.1 Equipment Description.

Prime Diesel Engine:
Make: Caterpillar,
Model: C-7.1
S/N: 88101519,
Maximum Horsepower Rating: 225 bhp,
Model Year 2016
EPA Certification: Tier 4f,
Engine Family GPKXL07.0BN1.
Powering a scrap metal shear.
3-inch diameter Vertical exhaust with flapper valve, 13.75 feet above ground.

2.2 Process Description.

This is a diesel engine powers a scrap metal shear for recycling use.

2.3 Emissions Controls.

This is a Tier 4f prime diesel engine equipped with certified oxidation catalyst and exhaust gas recirculation.

2.4 Attachments.

Generator specification sheet

3.0 Emissions

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

Table 1: Estimated PTE for criteria pollutants

	Emission Factor	Hourly Emissions	Daily Emissions	Annual Emissions	
Compound	g/bhp-hr	lbs/hr	lbs/day	tons/year	lbs/yr
NOx	0.20	0.10	2.40	0.436	872.82
CO	0.97	0.48	11.55	2.10	4202.47
NMHC	0.01	0.004	0.09	0.0162	32.33
PM	0.001	0.001	0.02	0.00323	6.465
SOx	NA	0.00253	0.06081	0.01107	22.13501

3.2 Estimated Emissions Assumptions.

- Emission factors were EPA certified emission factors.
- Calculations assume full load operation at 24 hours per day, 7 days per week, 52 weeks per year (a total of 8736 hours per year).

- 15 ppmw sulfur fuel
- Standard toxics emission factors for diesel engines.
- Other standard assumptions as stated in calculation sheets.

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

Rule 50: Visible emissions
This Rule prohibits any person from discharging from any sources of emissions for a period of more than three minutes any air contaminant which is darker in shade than that designated as Number 1 on the Ringlemann Chart, or of such opacity as to obscure an observer's view to a degree greater than does smoke of a shade designated as number 1 on the Ringlemann chart.
This engine is EPA certified, therefore, visible emission from the engine is expected to be in compliance with this rule.

Rule 51: Nuisance
This Rule prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other materials which causes injury, nuisance or annoyance to the public or which causes damage to business or property.
As a certified engine, no nuisance complaints are expected from this engine operation.

Rule 53(d)(1):
This rule limits discharge of sulfur compounds calculated as sulfur dioxide (SO2) to 0.05 percent by volume on a dry basis.
Assume all sulfur in fuel (15ppmw) is converted to SO2, discharge of SO2 by volume would be 0.00003 percent, therefore, the engine is in compliance with this requirement.

Rule 69.4.1: Stationary Reciprocating Internal Combustion Engines – Best Available Retrofit Control Technologies.
1. Applicability:
Rule 69.4.1(a)(1) indicates that except as provided in Section (b) on Exemptions, this rule applies to stationary internal combustion engines with a brake horsepower (bhp) rating of 50 or greater.
This engine is portable in nature, but it will remain at one operating location at the site, therefore, it is considered stationary and is subject to Rule 69.4.1.

2. Standards:
Rule 69.4.1(d)(1)(D) new or replacement non-emergency engines – diesel fuel to meet the following emission standards:

(D) New or Replacement Non-Emergency Engines – Diesel Fuel

Engine Type	Concentration of NOx (g/bhp-hr)	Concentration of NMHC (g/bhp-hr)	Concentration of CO (g/bhp-hr)
Certified engines using diesel fuel, 50 ≤ bhp < 75	3.5	N/A	3.7
Certified engines using diesel fuel, 75 ≤ bhp < 175	0.3	0.14	3.7
Certified engines using diesel fuel, 175 ≤ bhp < 750	0.3	0.14	2.6
Certified engines using diesel fuel, bhp ≥ 750	2.6	0.14	2.6
Certified generator sets using diesel fuel, bhp ≥ 750	0.5	0.14	2.6

This engine is a certified engine using diesel fuel; therefore, it has to meet 0.3 g/bhp-hr NOx, 0.14 g/bhp-hr VOC and 2.6 g/bhp-hr CO.
The engine complies with these emission standards as a Tier 4f engine with 0.2 g/bhp-hr NOx, 0.01 g/bhp-hr VOC and 0.97 g/bhp-hr CO.

Rule 69.4.1(d)(2) requires any engine subject to this rule and operating on diesel fuel to use only California Diesel Fuel.
This engine is only authorized to combust CARB diesel fuel.

3. Monitoring:
Rule 69.4.1(e)(1) requires an owner or operator of an engine without add-on control equipment, except engines specified in Subsections (b)(3) or (b)(4), to monitor the operating parameters recommended by the engine manufacturer and any additional operating parameters identified by the Air Pollution Control Officer. Such operating parameters may include, but are not limited to:
(i) engine air-to-fuel ratio;
(ii) engine inlet manifold temperature and pressure; and
(iii) oxygen content of the exhaust gas.
Where the Air Pollution Control Officer determines that it is not feasible to monitor operating parameters of an engine or such monitoring may not be indicative of air contaminant emissions, the requirements of this subsection may be waived provided that periodic inspection and maintenance are conducted as specified in Section (f) – Inspection and Maintenance Requirements.
This engine is Tier 4 certified with manufacturer installed add-on DOC. Since the engine has add-on control equipment, this section is not applicable.

Rule 69.4.1(e)(2) requires an owner or operator of an engine with add-on control equipment, except engines specified in Subsections (b)(3) or (b)(4), to install, operate and maintain in calibration, devices that continuously monitor the operational characteristics of the engine and

any NOx emission reduction system as determined necessary to ensure compliance by the Air Pollution Control Officer. Such operational characteristics shall include, but are not limited to:
(i) engine air-to-fuel ratio;
(ii) temperature of exhaust gas at the inlet and outlet of the add-on control equipment;
(iii) oxygen content of exhaust gas at the inlet and outlet of the add-on control equipment; or
(iv) flow rate of NOx reducing agent added to the engine exhaust gas.
Subsection (b)(5) states that the provisions of Subsection (e)(2) shall not apply to any engine with manufacturer installed add-on control equipment and certified with such equipment by the Environmental Protection Agency (EPA).
This engine is Tier 4 certified with manufacturer installed add-on DOC and complies with the emissions levels of this rule, however, Subsection (b)(5) states that the provisions of Subsection (e)(2) shall not apply to any engine with manufacturer installed add-on control equipment and certified with such equipment by the EPA, so Subsection (e)(2) does not apply.

69.4.1(e)(3) requires an owner or operator of an engine subject to this rule to install, and maintain in good working order, a non-resettable totalizing fuel meter and/or non-resettable meter that measures elapsed operating time as determined appropriate by the Air Pollution Control Officer. If an engine hour meter is replaced, the owner or operator shall notify the Air Pollution Control Officer in accordance with Subsection (g)(7).
This engine has an hour meter and fuel meter. Requirements for hour meter/fuel replacement are included with permit conditions.

Rule 69.4.1(e)(4) requires an owner or operator of a new or replacement non-emergency gaseous-fueled engine rated at 1,000 bhp or greater and permitted to operate more than 2,000 hours per calendar year to install, operate, and maintain a Continuous Emissions Monitoring System (CEMS) for NOx and CO.
This engine is rated at 225 bhp and is not gaseous fueled, therefore, it is not subject to this requirement.

Rule 69.4.1(e)(5) requires an owner or operator of a non-emergency gaseous-fueled engine, except engines specified in Subsections (b)(3)(ii), (b)(4)(ii) or (e)(4), to have a trained operator use a portable analyzer to take NOx and CO emission readings.
This engine is not gaseous fueled; therefore, it is not subject to this requirement.

4. Inspection and Maintenance:
Rule 69.4.1(f)(1) requires an owner or operator of an engine subject to this rule, except engines specified in Subsections (b)(3), (b)(4), (e)(4) or (e)(5), to conduct periodic inspections of the engine and any add-on control equipment, as applicable, to ensure that the engine and control equipment is operated in compliance with the provisions of this rule. Inspections shall be conducted at least once every 4,000 hours of operation, or every six months, whichever is less.
This requirement is included in permit conditions. Compliance with this requirement is verified through recordkeeping.

Rule 69.4.1(f)(2) requires an owner or operator of an engine subject to this rule to conduct, at a minimum, annual maintenance of the engine and any add-on control equipment, as applicable, as recommended by the engine and control equipment manufacturers or as specified by any other

maintenance procedure approved in writing by the Air Pollution Control Officer. Notwithstanding the frequencies recommended by the engine and control equipment manufacturers, the annual maintenance shall be conducted at least once each calendar year. Engine maintenance shall include, but is not limited to, the following:
(i) Changing the oil and filter, or testing the oil in accordance with the requirements of 40 CFR Part 63, Sections 63.6625(i) or 63.6625(j);
(ii) Inspecting and cleaning air filters, and replacing as necessary;
(iii) Inspecting all hoses and belts, and replacing as necessary; and
(iv) Inspecting spark plugs, if equipped, and replacing as necessary.
(3) Notwithstanding the frequencies specified in Subsections (f)(1) and (f)(2), the Air Pollution Control Officer may require an owner or operator of an engine to conduct inspections and/or maintenance of the engine and any associated add-on control equipment more frequently if deemed necessary to assure compliance with this rule.
Annual maintenance of engine according to written procedure will be required by permit conditions.

5. Recordkeeping:
Rule 69.4.1(g)(1) requires an owner or operator of an engine subject to this rule to keep the following records in electronic and/or hardcopy format and shall maintain these records on-site for at least the same period of time as the engine to which the records apply is located at the site:
(i) engine manufacturer name and model number;
(ii) brake horsepower rating;
(iii) combustion method, i.e., rich-burn or lean-burn;
(iv) fuel type(s);
(v) California Diesel Fuel certification, if applicable; and
(vi) a manual of recommended maintenance as provided by the engine manufacturer, or other maintenance procedure as approved in writing by the Air Pollution Control Officer.
Where the information specified in Subsections (g)(1)(i) through (g)(1)(iv) is contained in a District Permit to Operate, and is the most current information, an additional record of this information shall not be required.
Engine information is included with the permit equipment description, permit conditions require maintaining a copy of the recommended maintenance procedure.

Rule 69.4.1(g)(2) 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 maintenance records including 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 are required.

Compliance with this provision is expected and this requirement is specified in permit conditions.

Rule 69.4.1(g)(3) Requires an owner or operator of an engine subject to this rule to maintain, at a minimum, the following: (i) records of engine inspection, including dates an inspection was performed; and (ii) records of annual engine maintenance, including dates maintenance was performed and the nature of the maintenance.

These requirements are included with permit conditions.

Rule 69.4.1(g) (4) Requires an owner or operator to measure and record at least once each calendar month the applicable operating parameters identified pursuant to Subsections (e)(1) or (e)(2).
This engine is not subject to the requirements of Subsections (e)(1) or (e)(2), so this Subsection does not apply.

Rule 69.4.1(g) (5) requires an owner or operator of any non-emergency engine claiming an exemption pursuant to Subsection (b)(2)(i) to maintain an operating log and record dates, times and duration of all startups and shutdowns.
This engine is not claiming exemption for startups and shutdowns pursuant to Subsection (b)(2)(i), so this Subsection does not apply.

Rule 69.4.1(g)(6) requires an owner or operator of a new, modified, or replacement engine claiming an exemption pursuant to Subsection (b)(2)(ii) during commissioning period to comply with all of the following:
(i) Record and maintain the dates and times when fuel is being combusted and cumulative operating time for each new, modified, or replacement engine; and
(ii) Record and maintain any emissions data or other operating parameter data acquired or calculated by CEMS, or otherwise required by this rule for the engine.
This engine is not claiming exemption for commissioning pursuant to Subsection (b)(2)(ii), so this Subsection does not apply.

Rule 69.4.1(g)(7) requires an owner or operator of an engine subject to the requirements of Subsection (e)(3) to provide written notification to the Air Pollution Control Officer within 10 calendar days of replacing the engine hour meter. The notification shall include the following:
(i) Old meter's hour reading upon removal.
(ii) Replacement meter's manufacturer name, model, and serial number, if available.
(iii) Current hour reading of the replacement meter upon installation.
(iv) Copy of receipt of new meter, or of installation work order.
This requirement is included with permit conditions.

Rule 69.4.1(g)(8) requires an owner or operator of an engine subject to the requirements of Subsection (e)(5) [portable analyzer requirements] to comply with specified recordkeeping.
This engine is not subject to (e)(5) because it is not gaseous fueled.

Rule 69.4.1(g)(9) Requires specified records to be maintained on-site for at least three years and made available to the District upon request.
This requirement is included with permit conditions.

Rule 69.4.1(g)(10) requires all records required by Subsection (g)(8) to be retained in electronic and/or hardcopy format on-site, or off-site in a central location, for at least three years and made available to the District upon request.
This engine is not subject to the requirements of Subsection (g)(8) or (e)(5) because it is not a gaseous fueled engine.

Rule 69.4.1(i)(1) requires that after initial compliance has been determined, any engine subject to the requirements of Subsection (d)(1), except engines specified in Subsections (b)(3), (b)(4), (b)(7), or (i)(2), shall be source tested at least once every 2 permit years, unless more frequent testing is otherwise specified in writing by the Air Pollution Control Officer.
This engine is exempt from this Subsection, pursuant to Subsection (b)(7) because the engine is Tier 4 certified by the EPA at emission concentrations equal to or below the applicable emission standards of Subsection (d)(1). Subsection (b)(7) states that all provisions of Section (i) – Source Test Requirements shall not apply to this engine.

4.2 New Source Review (NSR) Rule 20.1-20.4
Rule 20.1 – New Source Review - General Provisions
Federal Major Stationary Source: Rule 20.1(c) Definitions (30) defines Major Stationary Source as any emission unit, project or stationary source which has, or will have after issuance of an Authority to Construct or modified Permit to Operate, an aggregate potential to emit one or more air contaminants in amounts equal to or greater than any of the emission rates listed in Table 5.

Major Stationary Source: Rule 20.1(c) Definitions (41) defines major stationary source as any emission unit, project or stationary source which has, or will have after issuance of an Authority to Construct or modified Permit to Operate an aggregate potential to emit one or more air contaminants, including fugitive emissions, in amounts equal to or greater than any of the emission rates listed in Table 5.

Table 8: Classification of Major/PSD Source and Modification New Source Review (NSR) Requirements

	NOx	VOC	PM-10	PM-2.5	SOx	CO	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***
Contemporaneous Calculations Performed?	**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**	**No**

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. 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.

Best Available Control Technology

Rule 20.2(d) Standards (1) Best Available Control Technology (i) requires any new or modified emission unit with a post-project potential to emit of 10 lbs per day or more of particulate matter (PM), NOx, VOC, SOx to be equipped with Best Available Control Technology (BACT) for each such air contaminant.

The proposed engine does not trigger BACT at the following emissions levels: NOx: 2.40 lbs/day – VOC: 0.09 lbs/day – PM: 0.02 lbs/day – SOx: 0.06 lbs/day. The proposed engine is also tier 4 certified which is the most stringent emission limit and therefore BACT is satisfied.

Air Quality Impact Analysis

Rule 20.2 (d)(2) – Non-Major Stationary Source AQIA:
This part of the rule requires the applicant to conduct an Ambient Air Quality Impact Analysis of the unit's emissions if the emission threshold values are equaled or exceeded for NOx, CO, SOx, or PM10. The threshold values for NOx and SOx are 25 lbs/hr, 250 lbs/day or 40 tons/yr. The threshold values for CO are 100 lbs/hr, 550 lbs/day or 100 tons/yr. The threshold values for PM10 are 100 lbs/day or 15 tons/yr.

Estimated emissions are below AQIA thresholds, AQIA is not applicable.

Rule 20.2 (d)(3) – Prevention of Significant Deterioration:
This part of the rule requires that notification be given to the Federal Land Manager, Federal EPA, ARB, SCAQMD and ICAPCD for any project which is expected to have a significant impact on any Class I area as determined by an AQIA. The threshold level for a significant impact is 250 tons/yr of NOx, CO, VOC, SOx, or PM10 emissions.

Estimated emissions are below AQIA thresholds. Therefore, no significant impact on any Class I area is expected and no notification is required.

Rule 20.2 (d)(4) – Public Notice and Comment:
This part of the rule requires that a public notice and comment period be provided for any project subject to an AQIA.

Estimated emissions are below AQIA thresholds. Therefore, no public notice and comment period is required.

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.

Table 2a: Rule 1200 Applicable Requirements and Discussion

Question	Answer	Discussion
Does the application result in an increase in toxic emissions?	Yes	The application does result in an increase in toxic emissions of specific trace heavy metals and organics (as shown in emission calculations section). See HRA for 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 used?	De Minimis	Engine passed de minimis evaluation. See calculations sheet.
Is the Project Equipped with T-BACT?	Yes	This engine is equipped with an oxidation catalyst.
Cancer Risk increase (per 10 million)	3.59	Meets standard of ten in one million.
Chronic HHI	<1	Meets standard of one.
Acute HHI	<1	Meets standard of one.
Passes Rule 1200?	Yes	This project passes rule 1200 with T-BACT.

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

4.4 AB 3205

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 school (Foothill's Middle School), so public notice is required for this section. A copy of the public notice is attached to the file and when the notice is issued, this evaluation and relevant attachments will be made

available on the District's website for review. If any comments are received, they will be reviewed, considered and responded to prior to taking action on the permit including revising any requirements as necessary in response to comments received.

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).

ATCM - Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines.

93115.1(b) indicates that except as provided in sections 93115.3 and 93115.9, this ATCM applies to any person who owns or operates a stationary Cl engine in California with a rated brake horsepower greater than 50 (>50 bhp).
931154(a)(72)(A) defines "Stationary Cl Engine" as a Cl engine that is designed to stay in one location or remains in one location. If the engine or its replacement is not attached to a foundation, it should reside at the same location for more than 12 consecutive months.
This engine is not attached to a foundation; however, it will stay at one location at the site for more than 12 consecutive months, therefore, it is considered stationary.

93115.5 Requires the use of CARB diesel as fuel.
Permit conditions will require use of CARB diesel fuel (15 ppm Sulfur by weight), which will ensure compliance with this requirement.

93115.7(a)(1) Emission requirements for non-emergency engines shall meet the applicable emission standards for New Stationary Prime Diesel-Fueled CI Engines: This engine is subject to the emission standards for prime engines, Model Year 2015+, 0.30 g/bhp-hr NOx, 3.70 g/bhp-hr CO, 0.14 g/bhp-hr VOC, 0.01 g/bhp-hr PM.

This engine is certified to Tier 4 final standards, which satisfies these requirements.

93115.7(a)(2) indicates after December 31, 2008, owners and operators shall only purchase and install new prime diesel-fueled CI engines certified to the new nonroad compression-ignition engine emission standards for all pollutants for 2007 and later model year engines as specified in 40 CFR, PART 60, Subpart III-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (2006).

This engine is certified Tier 4 final as a Model Year 2016 engine.

93115.10(a)-(b) Requires that specified information is submitted to the District as part of application package.
The submitted application contained all the required contact/location information, engine data, and emission information.

93115.10(d) Requires installation of a non-resettable hour meter and for engines with DPFs, a backpressure monitor that alerts the operator when the backpressure limit of the engine is approached.
This engine is not equipped with a DPF.

93115.13(a) Allows the use of certification data or other emission test data to demonstrate compliance with emission limits.

EPA certified emission data was used to evaluate this engine's compliance with the emission standards.

93115.13(f) 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 means as listed)

This engine is certified to Tier 4f standards and therefore is not subject to alternative compliance demonstration requirements.

NESHAP - 40 CFR- Part- 63-Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

40 CFR 63.6590(c) indicates that an affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of **40 CFR part 60 subpart IIII**, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part. Paragraph (c)(1) is for new or reconstructed stationary RICE located at an area source, which is the category of this engine.
This engine only needs to comply with the requirements listed below for 40 CFR Part 60 Subpart IIII.

NSPS - 40 CFR- Part 60-Subpart IIII

40 CFR 60.4200(2) Owners or Operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE is: (i) Manufactured after April 1, 2006, and are not fire pump engines.
This engine was manufactured in 2016 and constructed after July 11, 2005. Therefore, it is subject to the requirements of this subpart.

40 CFR 60.4204 Requires that engines meet emission limits equivalent to tier 4 levels.
This is a tier 4 final engine; therefore, it complies.

40 CFR 60.4207 Sets maximum fuel sulfur limits for fuel equivalent to CARB diesel requirements.
Permit conditions will require use of CARB diesel fuel (15 ppm Sulfur by weight), which will ensure compliance with this requirement.

40 CFR 60.4211(a) 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 by manufacturer.
Permit conditions specify this requirement.

40 CFR 60.4211(c) Requires that the engine be certified under EPA regulations.
This is a tier 4 Final certified engine; therefore, it complies.

40 CFR 60.4214(c) For engines with DPFs, requires records of corrective actions taken when the high backpressure limit is approached.
This engine is not equipped with DPF.

40 CFR 60.7(f) Requires that all records be maintained for at least 2 years.
Compliance with this provision is expected and this requirement is specified in permit conditions.

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

4.7 CEQA
CEQA Guidelines §15303 exempts construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.

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 APCD2022-CON-001952 is recommended with no hour limitation.