ENGINEERING EVALUATION
AUTHORITY TO CONSTRUCT

Facility Name:	K1
Equipment Type:	34H –Emergency Diesel Engine
Application #:	APCD2026-APP-009086
ID#:	APCD2026-SITE-05010
Equipment/Facility Address:	330 13th Street San Diego, CA 92101
Application Contact:	Stephanie Zahn, Community Manager (619) 391-3331, K1mgr@greystar.com

Permit Engineer:

7/16/2026

X Priscilla Castanon

Priscilla Castanon
Asst. Air Pollution Control Engineer
Signed by: Priscilla Castanon

Senior Engineer:

X

Joe Herzig
Sr. Air Pollution Control Engineer

1.0 Background

1.1 Type of Application: This is an application for a diesel emergency engine.

1.2 Permit History: The engine was previously permitted in 2021 under the company SVF Richman Thirteenth St SD LLC. The permit, APCD2021-PTO-003662, was retired due to non-payment in May 2021. The permit was not reinstated before the 6 months. The engine is now owned by a different company, K1.

1.3 Facility Description: This is a apartment rental agency that leases apartments in downtown San Diego.

1.4 Other Background Info: No current Hearing Board actions; no permit denials, no legal settlements; not a Title V facility. This is not a Title V facility.

2.0 Process Description

2.1 Equipment Description.

Emergency Standby Diesel Engine:
Manufacturer: Mitsubishi
Model: S12A2-Y2PTAW2,
S/N: 29157,
Maximum Rated Horsepower: 1207 BHP,
Model Year: 2018,
EPA Certification: Tier 2,
Engine Family: JMVXL33.9BBA,
Driving a 750 kW generator,
Exhausting horizontally through two 8' by 5' louvers, 57 feet above ground.

Annual Maintenance and Testing Limit: 10.9 hours

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.

Table 1: Estimated PTE for criteria pollutants

Compound	Hourly Emissions lbs/hr	Daily Emissions lbs/day	Annual Emissions tons/year
NOx	10.64	255.36	0.27
CO	1.19	28.58	0.03
NMHC	1.11	26.68	0.03
PM	0.34	8.10	0.01
SOx	0.01	0.31	0.00

Table 2: Estimated PTE for criteria pollutants (10.9)

Compound	Hourly Emissions lbs/hr	Daily Emissions lbs/day	Annual Emissions tons/year
NOx	10.64	115.97	0.06
CO	1.19	12.98	0.01
NMHC	1.11	12.12	0.01
PM	0.34	3.68	0.00
SOx	0.01	0.14	0.00

3.2 Estimated Emissions Assumptions.

- Emission factors were EPA certified emission factors
- Table 1 calculations assume full load operation, 24 hours per day and total of 50 hours per year.
- Table 2 calculations use the data from the health risk assessment which limits annual use to 10.9 hours per year. The 10.9 hours is used for the daily and annual limit.
- Standard toxics emission factors for diesel engines: Method E15- Diesel fired engine, ≤600bhp, uncontrolled, 15 ppmw sulfur fuel.
- 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

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 2: Prohibitory Rule Discussion				
Applicable Section	**Requirement**	**Engine Complies?**	**Explanation**	**Condition**
Rule 50	Visible Emissions not to exceed 20% opacity or Ringlemann 1 for more than 3 minutes in a 60 minute period	Yes	Compliance with this requirement is achieved through the use of an EPA certified engine, and permit conditions will specify this requirement.	C28413
Rule 51	Cannot cause or contribute to a public nuisance	Yes	Due to the intermittent operation of an emergency engine that meets all emission requirements, it is anticipated that this will not cause a public nuisance. Permit conditions will prohibit this engine from causing a public nuisance.	C28414
Rule 53	Emissions of sulfur compounds calculated as SO2 on a dry basis shall not exceed 0.05 % by volume on a dry basis.	Yes	Permit conditions will require use of CARB diesel fuel (15 ppm Sulfur by weight), which will ensure compliance with this requirement.	C28412
Rule 62	Sulfur content of liquid fuel shall not exceed 0.5 % sulfur by weight.	Yes	Permit conditions will require use of CARB diesel fuel (15 ppm Sulfur by weight), which will ensure compliance with this requirement.	C28412
Rule 69.4.1				
69.4.1(d)(1)(ii)(E)	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 bhp≥750. For a new or replacement certified diesel engine, CO emissions shall not exceed: 3.7 g/bhp-hr if 50≤bhp<100; 3.7 g/bhp-hr if	Yes	Use of an EPA certified tier 3 engine (tier 2 for engines with a rated power in excess of 750 bhp) ensures that NOx emissions comply with this requirement. This is a 1207 bhp Tier 2 engine. Both the NOx and CO emission requirements are within their designated thresholds for a replacement diesel engine.	NA

	100≤bhp<175; 2.6 g/bhp-hr if 175≤bhp<750; 2.6 g/bhp-hr if bhp≥750.			
69.4.1(d)(2)	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
69.4.1(e)(3)	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
69.4.1(f)(2)	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
69.4.1(g)(1)	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
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.	Yes	Compliance with this provision is expected and this requirement is specified in permit conditions.	C28415

	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.			
69.4.1(g)(6)	Requires records of the dates and times when fuel is being combusted and cumulative operating time if claiming a commissioning exemption.	NA	The applicant has not claimed a commissioning period is needed.	NA
69.4.1(g)(7)	Requires notification to APCD within 10 calendar days of replacing an hour meter.	Yes	Compliance with this provision is expected and this requirement is specified in permit conditions.	C28419
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.	Yes	Compliance with this provision is expected and this requirement is specified in permit conditions.	C43432
69.4.1(i)(1)	Requires periodic source testing to confirm compliance with applicable emission standards.	NA	This subsection does not apply to certified 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.

Table 3: 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**

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 4: New Source Review Discussion				
Rule/Requirement	**Requirement**	**Applicability**	**Discussion**	**Condition**
Applicability	Rule 20.2 applies to non-major sources	Yes	This is not a major source, so Rule 20.2 applies.	NA
Type of application	New installation, Replacement/Permit Modification	New	NA	NA
Exemptions	No exemptions apply to this equipment	NA	NA	NA
20.2(d)(1) – BACT				
BACT - NOx	Installation of BACT is required if emissions of NOx exceed 10 lbs/day	Triggered	115.97 lbs/day for one engine. See BACT discussion below.	NA
BACT - VOC	Installation of BACT is required if emissions of VOC exceed 10 lbs/day	Triggered	12.12 lbs/day for one engine. The potential to emit for this pollutant does not exceed this trigger level, so BACT is not required.	NA
BACT - PM-10	Installation of BACT is required if emissions of PM-10 exceed 10 lbs/day	Not Triggered, no permit limit	3.68 lbs/day for one engine. The potential to emit for this pollutant does not exceed this trigger level, so BACT is not required.	NA
BACT - SOx	Installation of BACT is required if emissions of SOx exceed 10 lbs/day	Not Triggered, no permit limit	0.14 lbs/day for one engine. The potential to emit for this pollutant does not exceed this trigger level, so BACT is not required.	NA
20.2(d)(2) – AQIA				
AQIA - NOx	Required for project emission increases in excess of 25 lbs/hr, 250 lbs/day or 40 ton/yr of NOx calculated as NO2	Not Triggered	The increase in emissions of this air contaminant from this project does not exceed any of these levels, so no AQIA is required.	NA
AQIA - PM-10	Required for project emission increases in excess of 100	Not Triggered	The increase in emissions of this air contaminant from this project does not	NA

	lbs/day or 15 ton/yr of PM-10		exceed any of these levels, so no AQIA is required.	
AQIA - SOx	Required for project emission increases in excess of 25 lbs/hr, 250 lbs/day or 40 ton/yr of SOx calculated as SO2	Not Triggered	The increase in emissions of this air contaminant from this project does not exceed any of these levels, so no AQIA is required.	NA
AQIA - CO	Required for project emission increases in excess of 100 lbs/hr, 550 lbs/day or 1000 ton/yr of CO	Not Triggered	The increase in emissions of this air contaminant from this project does not exceed any of these levels, so no AQIA is required.	NA
20.2(d)(3) - PSD	Applicable to source that may have a significant impact on a class I area	NA	This is not a PSD source and emissions are not expected to impact a class I area	NA
20.2(d)(4) - Public Notice	Requires 30 day public notice if an AQIA was required or if increase in VOC emissions from the project exceed 250 lbs/day or 40 ton/year	NA	AQIA was not required and VOC emission increase from this project does not exceed these levels.	NA

The post-project NOx PTE is 11597 lbs/day and VOC PTE is 12.12 lbs/day based on 10.9 hours of non-emergency operation, which is greater than the 10 lbs/day threshold for BACT.

Alternatives that were considered include natural gas and propane engines, Tier 4F engines including SCR and DPF, and installing an add-on DOC to control VOC. 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 NOx emissions control and DOC for VOC emissions control, methods which are 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.

<u>NOx Analysis:</u>
A tier 4 engine is the lowest emitting BACT option. Cost-effectiveness has previously been evaluated under applications APCD2021-APP-006831 and APCD2021-APP-006981, comparing incremental costs of a tier 2 vs. 4 engine; the results are summarized below. Note that this analysis is conservative and does not take into account the likely

short periods of operation of this engine for maintenance as noted above which would lower the level of emission reductions achieved.

Project	*Engine Size (bhp)*	*Capital Cost Tier 2*	*Capital Cost Tier 4*	*Annual Cost Tier 2*	*Annual Cost Tier 4*	*Annual Incremental Cost*	*Annual Emission Reduction (lb/yr)*	***Cost Effectiveness***
6831	*2346*	*$329,050*	*$603,826*	*$127,026*	*$200,228*	*$73,202*	*1,112*	***$65.82***
6981	*2937*	*$810,000*	*$1,200,000*	*$131,824*	*$195,294*	*$63,471*	*1,322*	***$48.03***

This analysis shows that a Tier 4f engine, the lowest-emitting category of diesel engines, is not cost-effective. The analysis is based on the assumption that the engine allowed to run up to 50 hours per year for maintenance and testing and the maximum NOx emissions were calculated using the emission standards for a tier 2 and tier 4 engines. Capital costs were provided by the permit applicants which were annualized and added to expected maintenance and operating costs to determine an overall annual cost. While the previous analysis was conducted for larger engines, it is still representative for this application because the equipment is very similar aside from engine size, and NOx emissions and costs are expected to scale roughly linearly with engine size. Additionally, the cost for an add-on SCR to a tier 2 engine is expected to have a similar cost to the incremental cost of a tier 4 engine, so this analysis also demonstrates that use of an SCR would not be cost effective, in addition to being technologically infeasible because it would not function during most periods of testing and maintenance.

A tier 2 certified engine is the next lowest emitting option and therefore satisfies BACT requirements for NOx.

<u>VOC Analysis:</u>
The installation of an add-on DOC to control the VOC emissions is also not expected to be cost-effective. The installation of an add-on DOC is only a fraction of the cost of a tier 4 final engine, conservatively estimated to only cost 10% of the difference in total annual cost described in the NOx BACT analysis. The average annual incremental cost, also accounting for the 50% reduction in engine size compared to the example is $3174 (This is the assumed total annual cost to install an add-on DOC). The installation of an add-on DOC is assumed to reduce VOC emissions by 50%. Current post-project VOC PTE is 21.35 lbs/year for this engine under APCD2023-APP-007783, and the overall VOC emission reduction would be 10.68 lb/year. The cost effectiveness is $297.15 per pound of VOC reduced, exceeding the $6.60/lb threshold.

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. This application is for a new permit which results in an increase in emissions.

Table 5: Rule 1200 Applicable Requirements and Discussion

Question	Answer	Discussion
Does the application result in an increase in toxic emissions?	Yes	The application results in an increase in toxic emissions of specific trace heavy metals and organics (as shown in emission calculations section).
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	There is only one engines within this project.
What type of HRA was used?	Refined	Project calculations were sent to Toxics to evaluate the impact of emissions from this equipment.
Is the Project Equipped with T-BACT?	No	Standard tier 2 engine, no add-on controls
Cancer Risk increase (per one million)	<1	The Cancer Risk meets the standard of one in one million.
Chronic HHI	<1	The Chronic HHI meets the standard of one.
Acute HHI	<1	The Acute HHI meets the standard of one.
Passes Rule 1200?	Yes	Maintenance and testing (non-emergency operation) must be limited by permit conditions to 10.9 hours per calendar year to pass Rule 1200.

A refined health risk assessment (HRA) was required for this engine. The initial HRA modeled the exhaust discharge as a small-volume source based on the available information indicating that the exhaust was released horizontally through two louvered openings located on either side of the enclosure. Under this modeling approach, the resulting health risk values limited the allowable non-emergency operating hours. To better characterize the emission release parameters and reduce uncertainty in the modeling assumptions, additional information regarding the exhaust configuration was requested.

Based on the supplemental information provided, the exhaust discharge was determined to be more appropriately represented as a horizontal point source. The HRA was subsequently revised using this characterization, resulting in the health risk values presented below.

Estimated Risk Levels:

Maximum Individual Cancer Risk (Resident)	4.55 in one million
Chronic Noncancer Health Hazard Index (Resident)	= 1.54E-03
8-Hour Noncancer Health Hazard Index (Worker)	= NA*
Maximum Acute Health Hazard Index	= 0.155

*8-Hour Non-Cancer Health Hazard Index is only applicable when calculating worker risk

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.

The estimated cancer risk for the application exceeds Rule 1200 limits of 1 in one million (not equipped with T-BACT) at 50 hours, therefore the project is within Rule 1200 thresholds contingent on Routine Maintenance and Testing limited to 10.9 hours per year.

Based on this analysis, the proposed engine meets the requirements of District Rule 1200 if limited to 10.9 hours per year.

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 two schools, e3 Civic High and the Charter School of San Diego. Therefore a public notice is required. This section of the evaluation will remain open until the comment period is closed.

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 6a: State and Federal Requirement Discussion – Stationary ATCM				
Applicable Section	**Requirement**	**Engine Complies/Expected 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
93115.4	Definitions. Permit conditions ensure that the engine only operates in a manner allowed for engines designated as "Emergency Standby"	Yes	Permit conditions require that the engine operate only as an emergency engine	C40239
93115.5	Requires the use of CARB diesel as fuel.	Yes	Permit conditions will require use of CARB diesel fuel (15 ppm Sulfur by weight), which will ensure compliance 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
93115.6(a)(2)	Allows for engine to be started 30 minutes prior to rotating outage	NA	Permit conditions specify this 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 Diesel PM emissions less than 0.15 g/bhp-hr	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

93115.6(a)(3)(A)(1)(c)	Restricts maintenance and testing operation to no more than 50 hours per calendar year	Yes	Permit conditions specify this requirement. Annual Limit: 10.9 hours/year This limit is listed in the permit conditions.	C44986
93115.6(c)	Does not allow emergency standby engines to operate as part of "demand response programs" unless additional requirements are met	NA	Permit conditions specify this requirement.	C40907
93115.10(a)-(b)	Requires that specified information is submitted to the District as part of application package	Yes	The submitted application contained all of the required contact/location information, engine data, and emission information	NA
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	Yes	Permit conditions require the installation and use of a non-resettable hour meter. Permit conditions require installation and use of a backpressure monitor between the engine and DPF. This engine does not have a DPF.	C28419
93115.10(f)	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 testing, other, demand response) of each period of operation	Yes	Permit conditions require that these records be kept and the summary updated monthly	C45252
93115.10(f)	Requires records of CARB diesel fuel certification	Yes	Permit conditions require that documentation of the CARB diesel certification for all fuel used be maintained	C43434
93115.10(f)	States that records must be kept on-site for at least 24 months and off-site for an additional 12 months (total 36 months)	Yes	Compliance with this provision is expected and this requirement is specified in permit conditions.	C43432

93115.13(a)	Allows the use of certification data or other emission test data to demonstrate compliance with emission limits	Yes	The manufacturer's engine rating specific emission data was used to determine compliance and for emission calculations	NA
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)	NA	This engine is not equipped with a DPF.	NA

Table 6b: State and Federal Requirement Discussion				
Applicable Section	**Requirement**	**Engine Complies/Expected to Comply?**	**Explanation**	**Condition**
NESHAP ZZZZ				
40 CFR 63.6590(b)-(c)	Requires that new emergency engines comply with the NESHAP by complying with the applicable NSPS	Yes	See NSPS section below.	NA
NSPS IIII				
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. This engine is a tier 2.	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
40 CFR 60.4209	Requires installation of a non-resettable hour meter	Yes	Permit conditions require the installation and use of a non-resettable hour meter.	C28419

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	Yes	Permit conditions specify this requirement.	C43433
40 CFR 60.4211(c)	Requires that the engine be certified under EPA regulations	Yes	Use of an EPA certified tier 3 engine (tier 2 for engines with a rated power in excess of 750 bhp). This engine is a certified tier 2 engine.	NA
40 CFR 60.4211(e)	Restricts operation of emergency engines for non-emergency purposes	Yes	Compliance ensured by permit conditions for ATCM limiting operation for maintenance and testing to no more than 50 hours, restricting non-emergency operation for only those uses allowed by the permit (maintenance and testing). ATCM requirements more stringent than NSPS.	C40239, C40907, C44986
40 CFR 60.4214(b)	Requires records of operation to show that engine is operated as an emergency engine	Yes	Compliance is expected and specified in permit conditions.	C45251
40 CFR 60.4214(c)	For engines with DPFs, requires records of corrective actions taken when the high backpressure limit is approached	NA	The engine is not equipped with a DPF.	NA
40 CFR 60.7(f)	Requires that all records be maintained for at least 2 years	Yes	Compliance with this provision is expected and this requirement is specified in permit conditions.	C43432

4.6 Air Toxics Hot Spots

This rule is applicable to each existing stationary source required to prepare a health risk assessment, as determined by the Air Pollution Control Officer pursuant to the priority system and procedures set out in Section 44360 of the California Health and Safety Code. *This is a new stationary source and it did not require a health risk assessment. Therefore this rule is not applicable.*

4.7 Title V.

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

4.8 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, that an authority to construct be issued with the following conditions.

6.0 Recommended Conditions

Conditions from standard BEC APCD2020-CON-001704 are recommended with the annual limit of 10.9 hours in the permit description.

Condition Name	Description	Rule Reference
1. C40239	The engine shall be operated exclusively during emergencies as defined in Rule 69.4.1 or Rule 12 or 17CCR93115 as applicable, or for maintenance and testing.	Rule 69.4.1 Rule 12 Stationary ATCM
2. C40907	This engine shall not be used as a part of a non-emergency Demand Response Program (DRP). This condition shall not apply to engines operating pursuant to the rolling blackout reduction program as defined in 17 CCR 93115 and operating in accordance with 17 CCR 93115.6(c). (17 CCR 93115)	Stationary ATCM
3. C44986	Engine operation for maintenance and testing purposes shall not exceed the hours per calendar year specified in the above equipment description. (17 CCR 93115, Rule 1200, NSR)	Stationary ATCM Rule 1200 Rule 20.2
4. C28412	This engine shall only use CARB diesel fuel. (Rule 12, Rule 69.4.1, 17 CCR 93115, 40 CFR 60 Subpart IIII)	Rule 12 Rule 69.4.1 Stationary ATCM Subpart IIII
5. C28413	Visible emissions including crank case smoke shall comply with Air Pollution Control District Rule 50. (Rule 50)	Rule 50
6. C28414	The equipment described above shall not cause or contribute to a public nuisance. (Rule 51)	Rule 51
7. C28415	This engine shall not operate for non-emergency use during the following periods, as applicable:	Stationary ATCM

		(a) whenever there is any school sponsored activity, if engine is located on school grounds or (b) between 7:30am and 3:30pm on days when school is in session, if the engine is located within 500 feet of, but not on, school grounds. This condition shall not apply to an engine located at or near any school grounds that also serve as the students' place of residence. (17 CCR 93115)	
8.	C28560	Engine operation in response to notification of an impending rotating outage shall be subject to all the following restrictions: (a) the utility distribution company has ordered rotating outages in the control area where the engine is located, (b) the engine is operated no more than 30 minutes prior to the time when the utility distribution company officially forecasts a rotating outage in the cited control area, and (c) the engine operation is terminated immediately after the utility distribution company advises that a rotating outage is no longer in effect. This condition shall not apply to engines operating pursuant to the rolling blackout reduction program as defined in 17 CCR 93115 and operating in accordance with 17 CCR 93115.6(c). (17 CCR 93115)	Stationary ATCM
9.	C28419	A non-resettable engine hour meter shall be installed on this engine, maintained in good working order, and used for recording engine operation hours. If a meter is replaced, the Air Pollution Control District's Compliance Division shall be notified in writing within 10 calendar days. The written notification shall include the following information: (a) old meter's hour reading, (b) replacement meter's manufacturer name, model and serial number if available and current hour reading on replacement meter, and (c) copy of receipt of new meter or of installation work order. A copy of the meter replacement notification shall be maintained onsite and made available to the Air Pollution Control District upon request. (Rule 12, Rule 69.4.1, 17 CCR 93115, 40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ)	Rule 12 Rule 69.4.1 Stationary ATCM Subpart IIII/ZZZZ

10. C43433	The owner or operator of this engine shall install, configure, operate, and maintain this engine and control device, if any, according to the manufacturer's emission-related written instructions. The owner or operator may change only those emission-related settings that are permitted by the manufacturer. The periodic maintenance shall be conducted at least once each calendar year. (Rule 12, Rule 69.4.1, 40 CFR 60 Subpart IIII)	Rule 12 Rule 69.4.1 Subpart IIII
11. C45251	The owner or operator of this engine shall conduct periodic maintenance of the engine and add-on control equipment, if any, as recommended by the engine and control equipment manufacturers or as specified by the engine servicing company's maintenance procedures. Maintenance shall be conducted at least once each calendar year, and shall include, but is not limited to, the following: 1) Change oil and filter, or test in accordance with the requirements of 40 CFR §63.6625(i) or (j); 2) Inspect and clean air filters, replacing as necessary; and 3) Inspect all hoses and belts, replacing as necessary. Documentation of oil and filter changes or copies of the oil test analysis shall be kept on site and made available upon request. If testing in accordance with 40 CFR §63.6625(i) or (j), the oil analysis program must analyze the Total Base Number, viscosity and percent water content (for compression ignition engines) and the Total Acid Number, viscosity and percent water content (for spark ignited engines). If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (Rule 12, Rule 69.4.1, 40 CFR 63 Subpart ZZZZ)	Rule 12 Rule 69.4.1 Subpart ZZZZ
12. C43434	The owner or operator of the engine shall maintain the following records on site for at least the same period of time as the engine to which the records apply is located at the site: (a) documentation shall be maintained identifying the fuel as CARB diesel, and (b) manual of recommended maintenance provided by the	Rule 12 Rule 69.4.1 Stationary ATCM Subpart IIII

	manufacturer. (Rule 12, Rule 69.4.1, 17 CCR 93115, 40 CFR 60 Subpart IIII)	
13. C45252	The owner or operator of this engine shall maintain a monthly operating log containing, at a minimum, the following: (a) dates and elapsed times of every instance of engine operation based on actual readings of the engine hour meter; whether the operation was for maintenance and testing purposes or emergency use; and the nature of the emergency; (b) if located within 500 feet of a school, the time of day of every instance of engine operation for testing and maintenance, unless the engine emits no more than 0.01 g/bhp-hr of diesel particulate matter or meets the requirements specified in 17CCR, Section 93115.13(f); (c) for a total external power outage, documentation from the serving utility of an outage in the area where the engine is located; for an internal power outage, a description of what caused the failure and receipts and/or work orders for the necessary repairs; for a partial external power outage, including a low-voltage or electrical transient incident in which the external power voltage is low enough to trigger the operation of an emergency standby engine, a description of the incident; (d) total cumulative hours of operation per calendar year; (e) records of annual engine maintenance shall include the date the maintenance was performed and the nature of the maintenance; and (f) hours of operation for all uses other than those specified above and identification of the nature of that use. (Rule 12, Rule 69.4.1, 17 CCR 93115, 40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ)	Rule 12 Rule 69.4.1 Stationary ATCM Subpart IIII/ZZZZ
14. C43432	All records required by this permit shall be maintained on site and readily available for District inspection for a minimum of 36 months from their date of creation unless otherwise indicated by the conditions of this permit. (Rule 12, Rule 69.4.1, 40 CFR 60 Subpart IIII)	Rule 12 Rule 69.4.1 Subpart IIII
15. CHW001	Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.	District Standard
16. CHW002	This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.	District Standard
17. CHW003	The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable	District Standard

	requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)	

All relevant attachments are uploaded to BCMS under the corresponding application numbers.