| | |
|---|---|
| **Facility Name:** | SGF SoCal PC |
| **Equipment Type:** | 34H – Emergency Diesel Engine |
| **Application #:** | APCD2026-APP-008998 |
| **ID#:** | APCD2026-SITE-04962 |
| **Equipment/Facility Address:** | 420 Stevens Avenue, Suite 300<br>Solana Beach CA 92075 |
| **Facility Contact:** | Susan Strachan<br>619-685-0649<br>susan.strachan@sgfertility.com |
| **Applicant Contact:** | Patrick Tam<br>714 417 1368<br>Tam@proehs.com |
| **Permit Engineer:** | 2/17/2026<br>X Hawzhin Muhamed<br>Hawzhin Muhamed<br>Assistant APC Engineer<br>Signed by: E089831 |
| **Senior Engineer Signature:** | X<br>Joseph Herzig<br>Senior APC Engineer |

## 1.0 Background

**1.1 Type of Application:** "New" installation for an existing emergency engine/ generator, operating unpermitted. For rules and regulation's purpose, this generator is not considered existing but new (NSR 20.1 definition).

**1.2 Permit History:** This application was submitted to permitting an existing engine that was installed on July 18, 202 without an Authority to Construct. The applicant submitted this application to comply with District Rules.

**1.3 Facility Description:** This is a health facility. The site has no other permitted equipment with SDAPCD and no other open applications 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. This facility is not subject to any Rule 1210 requirements.

## 2.0 Process Description

### 2.1 Equipment Description.

Emergency Diesel Engine Generator:
Make: John Deere,
Model: 6090HFG06
S/N: PE6068H362584,
Maximum Horsepower Rating: 463 bhp,
Model Year 2023
EPA Certification: Tier 4f,
Engine Family PJDXL09.0313.
Driving a 250-kW emergency electrical generator.
4-inch diameter Vertical exhaust with flapper valve, 12.5 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 t final certified diesel engine equipped with Diesel Oxidation Catalyst and Select Reduction System.

### 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 | 0.06 | 0.06 | 1.46 | 0.002 | 3.05 |
| CO | 0.002 | 0.002 | 0.05 | 0.0001 | 0.10 |
| NMHC | 0.000 | 0.00 | 0.00 | 0.000 | 0.00 |
| PM | 0.01 | 0.02 | 0.37 | 0.0004 | 0.76 |
| SOx | NA | 0.005 | 0.11 | 0.0001 | 0.237 |

### 3.2 Estimated Emissions Assumptions.

- Emission factors were manufacturer-provided emission factors for the engine family.
- Calculations assume full load operation at 24 hours per day and a total of 50 hours per year.
- 15 ppmw sulfur fuel
- Standard toxics emission factors for diesel engines.
- 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 2: Prohibitory Rule Discussion | | | | |
|---|---|---|---|---|
| **Applicable Section** | **Requirement** | **Engine Complies?** | **Explanation** | **Condition** |
| **Rule 50** | Visible Emissions not to exceed 20% opacity or Ringelmann 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 (C)(24)** | "New Engine" means an engine for which a complete application was submitted to the District after July 8, 2020. | Yes | A complete application for this engine was submitted to the District in 2026, hence it is considered "New" | NA |
| **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 | Yes | This is a tier 4 final engine, therefore it complies. | NA |

| | | | | |
|---|---|---|---|---|
| | 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 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. 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. | Yes | Compliance with this provision is expected and this requirement is specified in permit conditions. | C45252 |
| **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.

| Table4: 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 | NA | 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 | Not Triggered, no permit limit | The potential to emit for this pollutant does not exceed this trigger level, so BACT is not required. | NA |
| **BACT - VOC** | Installation of BACT is required if emissions of VOC exceed 10 lbs/day | Not Triggered, no permit limit | 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 | 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 | 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 the daily, so AQIA is not required. | NA |
| **AQIA - PM-10** | Required for project emission increases in excess of 100 lbs/day or 15 ton/yr of PM-10 | 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 - 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 |

**20.2(d)(1) – BACT**
No BACT limits were triggered by this engine, therefore no BACT is required for this project.

**20.2(d)(2) – AQIA**
No AQIA limits were triggered by this engine, therefore no AQIA is required for this project.

### 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 5a: 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. This application is for re-permitting of an existing engine with no changes in emission of pollutants. |
| **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 | |
| **Is the Project Equipped with T-BACT?** | No | The engine is equipped with DOC which is typically considered T-BACT for the equipment type |
| **Cancer Risk increase (per one million)** | <1 | Meets standard of one when limited to 10 hrs. /yr. |
| **Chronic HHI** | <1 | Meets standard of one. |
| **Acute HHI** | <1 | Meets standard of one. |
| **Passes Rule 1200?** | Yes | Maintenance and testing (non-emergency operation) must be limited by permit conditions to 50 hours per calendar year. |

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 (Santa Fe Christian Schools), 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).

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 | Yes | 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 | Yes | This is a tier 4 Final engine, therefore it complies. | NA |

| | | | | |
|---|---|---|---|---|
| | Diesel PM emissions less than 0.15 g/bhp-hr | | | |
| **93115.6(a)(3)(A)(1)(c)** | Restricts maintenance and testing operation to no more than 50 hours per calendar year | NA | Permit conditions specify this requirement. | C28643 |
| **93115.6(c)** | Does not allow emergency standby engines to operate as part of "demand response programs" unless additional requirements are met | Yes | 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. | 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 certified to Tier 4 final standards, and therefore is not subject to alternative compliance demonstration requirements. | NA |

**Table 6a: 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 60.4200** | Owners or Operators of stationary CI ICE that commence construction after July 11, 2005, where stationary CI ICE are: | Yes | This diesel engine is a CI ICE and 2023 model year; therefore, is subject to these requirements. | NA |

| | | | | |
|---|---|---|---|---|
| | (i) Manufactured after April 1, 2006, and are not fire pump engines, | | | |
| **40 CFR 60.4205** | Requires that engines meet emission limits equivalent to tier 3 levels (tier 2 for engines 750 bhp or higher) | Yes | This is a tier 4 Final engine, therefore it complies. | 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) | 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 per calendar year and restricting non-emergency operation for only those uses allowed by the permit (maintenance and testing). ATCM requirements more stringent than NSPS. | C40239, C40907, C28643 |
| **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. | C45252 |

| | | | | |
|---|---|---|---|---|
| **40 CFR 60.4214(c)** | For engines with DPFs, requires records of corrective actions taken when the high backpressure limit is approached | NA | 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 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/ Start-up Authorization be issued with the following conditions.

## 6.0 Recommended Conditions

Standard BEC Conditions APCD2020-CON-001647 with a 50 hour/year limit for non-emergency/maintenance and testing.