

# ENGINEERING EVALUATION AUTHORITY TO CONSTRUCT

**Facility Name:** VA Healthcare  
**Equipment Type:** [34H] California Certified Emergency Engine  
**Application #:** APCD2026-APP-009105  
**ID#:** APCD1978-SITE-01521  
**Equipment/Facility Address:** 3350 La Jolla Village Dr  
San Diego, CA 92161  
**Facility Contact:** Pierre Battice (Facility contact)  
(858) 226-5340  
Pierre.battice@va.gov

7/30/2026

**X** Austin Stein

Austin Stein  
Asst. Air Pollution Control Engineer  
Signed by: E100885

**Permit Engineer:**

**X**

Joseph N. Herzig  
Senior Air Pollution Control Engineer

**Senior Engineer Signature:**

## 1.0 Background

**1.1 Type of Application:** New installation of a multi-location emergency diesel engine powering a CT scanner.

**1.2 Permit History:** This is the initial application for this equipment.

**1.3 Facility Description:** This is a multi-location permit. The locations will be Veterans Affairs medical facilities across San Diego. The engine will operate at each of these locations for more than the 12 month residency time of a portable engine and therefore will be considered as stationary use at each location. There are no other open APCD applications at this SITE. There are multiple active permits for engines, turbines, and boilers at these sites.

**1.4 Other Background Info:** There is one (1) open NOV for installing diesel engines without permits. No current Hearing Board actions; no permit denials, no legal settlements; not a Title V facility.

## 2.0 Process Description

### 2.1 Equipment Description.

Emergency Diesel Engine Generator (Multi-location):

Manufacturer: John Deere;

Model: 3029HG530;

S/N: CD3029U222443;

Horsepower (maximum rated): 74 BHP;

Model Year: 2022;

EPA Certification Tier: 4 FINAL;

Engine Family (EPA): NJDXL02.9318;

Driving a 50 kW generator powering a mobile CT scanner;

3-inch diameter vertical exhaust with flapper raincap, exhausting 10 ft. above ground.

Equipment operation allowed at:

. 3350 La Jolla Village Dr, San Diego, CA 92161

. 353 H St, Chula Vista, CA 91910

. 8875 Aero Dr, San Diego, CA 92123

. 1300 Rancho Del Oro Dr, Oceanside, CA 92057

### 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 to power a mobile CT scanner operation.

This engine will operate at 4x locations, stationary operation at each location.

It will be assumed that full load operation may happen at any of the 4x locations and residency time will exceed 12 months, therefore this engine will be evaluated as stationary at each location.

### 2.3 Emissions Controls.

This is a Tier 4 FINAL certified diesel engine. It is equipped with a diesel particulate filter (DPF) and diesel oxidation catalyst (DOC).

### 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        | Emission Factor | Hourly Emissions | Daily Emissions | Annual Emissions |        |
|-----------------|-----------------|------------------|-----------------|------------------|--------|
|                 | g/bhp-hr        | lbs/hr           | lbs/day         | tons/year        | lbs/yr |
| NO <sub>x</sub> | 3.09            | 0.50             | 12.09           | 0.013            | 25.19  |
| CO              | 0.00            | 0                | 0               | 0                | 0.00   |

|      |      |         |        |         |       |
|------|------|---------|--------|---------|-------|
| NMHC | 0.01 | 0.0024  | 0.06   | 0.0001  | 0.12  |
| PM   | 0.01 | 0.0012  | 0.03   | 0.00003 | 0.06  |
| SOx  | NA   | 0.00085 | 0.0203 | 0.00002 | 0.042 |

### 3.2 Estimated Emissions Assumptions

- Table 1 evaluates the emission unit at 24 hours per day and a total of 50 hours per year, assuming full load operations.
- Estimated emissions are calculated for maintenance and testing operations. Emergency use is not counted towards operation limits.
- 15 ppmw sulfur fuel
- Emission factors were EPA certified emission factors; Standard toxics emission factors for diesel engines.
- Expected actual emissions same as PTE.
- 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.

# ENGINEERING EVALUATION AUTHORITY TO CONSTRUCT

**Table 2: Prohibitory Rule Discussion**

| Applicable Section         | Requirement                                                                                                                                                                                                                                                                                                                                                                                        | Engine Complies? | Explanation                                                                                                                                                                                                                                                | Condition |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>Rule 50</b>             | 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    |
| <b>Rule 51</b>             | 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    |
| <b>Rule 53</b>             | Emissions of sulfur compounds calculated as SO <sub>2</sub> 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    |
| <b>Rule 62</b>             | 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    |
| <b>Rule 69.4.1</b>         |                                                                                                                                                                                                                                                                                                                                                                                                    |                  |                                                                                                                                                                                                                                                            |           |
| <b>69.4.1(d)(1)(ii)(E)</b> | Emission standards for NO <sub>x</sub> and CO emissions. For a new or replacement certified diesel engine, NO <sub>x</sub> 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 NO <sub>x</sub> and CO emissions comply with this requirement. This engine is a tier 4 FINAL, therefore it complies with this requirement. | NA        |

ENGINEERING EVALUATION  
AUTHORITY TO CONSTRUCT

|                     |                                                                                                                                                                                                                                                                                                                 |     |                                                                                                                                                                                                                                                                |        |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
|                     | 100≤bhp<175; 2.6 g/bhp-hr if<br>175≤bhp<750; 2.6 g/bhp-hr if<br>bhp≥750.                                                                                                                                                                                                                                        |     |                                                                                                                                                                                                                                                                |        |
| <b>69.4.1(d)(2)</b> | 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 |
| <b>69.4.1(e)(3)</b> | 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 |
| <b>69.4.1(f)(2)</b> | The owner or operator must conduct periodic maintenance on the engine, 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 |
| <b>69.4.1(g)(1)</b> | 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 |
| <b>69.4.1(g)(2)</b> | 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.<br><br>Engines within 500 feet of schools must record the time of day when | Yes | Compliance with this provision is expected and this requirement is specified in permit conditions.                                                                                                                                                             | C46473 |

ENGINEERING EVALUATION  
AUTHORITY TO CONSTRUCT

|                     |                                                                                                                                              |     |                                                                                                    |        |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----|----------------------------------------------------------------------------------------------------|--------|
|                     | the engine is operated for testing and maintenance. Specific records for internal, external, and partial external power outages is required. |     |                                                                                                    |        |
| <b>69.4.1(g)(6)</b> | 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 exemption is needed.                                 | NA     |
| <b>69.4.1(g)(7)</b> | 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 |
| <b>69.4.1(g)(9)</b> | 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 |
| <b>69.4.1(i)(1)</b> | Requires periodic source testing to confirm compliance with applicable emission standards.                                                   | NA  | This subsection does not apply to certified emergency engines.                                     | NA     |

# ENGINEERING EVALUATION AUTHORITY TO CONSTRUCT

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

This application is subject to District NSR rules. At the time of filing, this facility is not considered a 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**

|                                                                                                 | <b>NO<sub>x</sub></b> | <b>VOC</b> | <b>PM-10</b> | <b>PM-2.5</b> | <b>SO<sub>x</sub></b> | <b>CO</b>  | <b>Lead</b> |
|-------------------------------------------------------------------------------------------------|-----------------------|------------|--------------|---------------|-----------------------|------------|-------------|
| <i>Major Source Threshold (ton/year)</i>                                                        | <i>50</i>             | <i>50</i>  | <i>100</i>   | <i>100</i>    | <i>100</i>            | <i>100</i> | <i>100</i>  |
| <b>Major Source? (yes/no)</b>                                                                   | <b>No</b>             | <b>No</b>  | <b>No</b>    | <b>No</b>     | <b>No</b>             | <b>No</b>  | <b>No</b>   |
| <i>Major Modification Threshold (ton/year)</i>                                                  | <i>25</i>             | <i>25</i>  | <i>15</i>    | <i>10</i>     | <i>40</i>             | <i>100</i> | <i>0.6</i>  |
| <b>Major Modification at a Major Source?</b>                                                    | <b>No</b>             | <b>No</b>  | <b>No</b>    | <b>No</b>     | <b>No</b>             | <b>No</b>  | <b>No</b>   |
| <b>Contemporaneous Calculations Performed?</b>                                                  | <b>No</b>             | <b>No</b>  | <b>No</b>    | <b>No</b>     | <b>No</b>             | <b>No</b>  | <b>No</b>   |
| Federal Major Stationary Source Threshold (ton/year)<br>(Severe non-attainment status)          | 25                    | 25         | 100          | 100           | 100                   | 100        | 100         |
| <b>Federal Major Stationary Source?</b>                                                         | <b>No</b>             | <b>No</b>  | <b>No</b>    | <b>No</b>     | <b>No</b>             | <b>No</b>  | <b>No</b>   |
| <i>Federal Major Modification Threshold (ton/year)</i><br><i>(Severe non-attainment status)</i> | <i>25</i>             | <i>25</i>  | <i>15</i>    | <i>10</i>     | <i>40</i>             | <i>100</i> | <i>0.6</i>  |
| <b>Federal Major Modification?</b>                                                              | <b>No</b>             | <b>No</b>  | <b>No</b>    | <b>No</b>     | <b>No</b>             | <b>No</b>  | <b>No</b>   |
| <b>Contemporaneous Net Calculations Performed</b>                                               | <b>No</b>             | <b>No</b>  | <b>No</b>    | <b>No</b>     | <b>No</b>             | <b>No</b>  | <b>No</b>   |
| <i>PSD Threshold (ton/year)</i>                                                                 | <i>250</i>            | <i>250</i> | <i>250</i>   | <i>--</i>     | <i>250</i>            | <i>250</i> | <i>--</i>   |
| <i>PSD Modification Threshold (ton/year)</i>                                                    | <i>40</i>             | <i>40</i>  | <i>15</i>    | <i>--</i>     | <i>40</i>             | <i>100</i> | <i>0.6</i>  |
| <b>PSD New or Modification?</b>                                                                 | <b>No</b>             | <b>No</b>  | <b>No</b>    | <b>No</b>     | <b>No</b>             | <b>No</b>  | <b>No</b>   |

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. Requirements of this rule apply; as shown in the table on the following page and sections 20.2(d)(1-2).

| <b>Table 4: New Source Review Discussion</b> |                                                                                                                                           |                                         |                                                                                                                                  |                  |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|------------------|
| <b>Rule/Requirement</b>                      | <b>Requirement</b>                                                                                                                        | <b>Applicability</b>                    | <b>Discussion</b>                                                                                                                | <b>Condition</b> |
| <b>Applicability</b>                         | Rule 20.2 applies to non-major stationary sources                                                                                         | Yes                                     | This is a non-major stationary source, so Rule 20.2 applies.                                                                     | NA               |
| <b>Type of application</b>                   | New                                                                                                                                       | Yes                                     | NA                                                                                                                               | NA               |
| <b>Exemptions</b>                            | No exemptions apply to this equipment                                                                                                     | NA                                      | NA                                                                                                                               | NA               |
| <b>20.2(d)(1) – BACT</b>                     |                                                                                                                                           |                                         |                                                                                                                                  |                  |
| <b>BACT - NO<sub>x</sub></b>                 | Installation of BACT is required if emissions of NO <sub>x</sub> exceed 10 lbs/day                                                        | <b>Triggered, see discussion below.</b> | The potential to emit for this pollutant is 12 lbs/day, which does exceed this trigger level, so BACT is required.               | NA               |
| <b>BACT - VOC</b>                            | 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 is 0.06 lbs/day, which does not exceed this trigger level, so BACT is not required.     | NA               |
| <b>BACT - PM-10</b>                          | 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 is 0.03 lbs/day, which does not exceed this trigger level, so BACT is not required.     | NA               |
| <b>BACT - SO<sub>x</sub></b>                 | Installation of BACT is required if emissions of SO <sub>x</sub> exceed 10 lbs/day                                                        | Not triggered, no permit limit          | The potential to emit for this pollutant is 0.02 lbs/day, which does not exceed this trigger level, so BACT is not required.     | NA               |
| <b>20.2(d)(2) – AQIA</b>                     |                                                                                                                                           |                                         |                                                                                                                                  |                  |
| <b>AQIA - NO<sub>x</sub></b>                 | Required for project emission increases in excess of 25 lbs/hr, 250 lbs/day or 40 ton/yr of NO <sub>x</sub> calculated as NO <sub>2</sub> | 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               |
| <b>AQIA - PM-10</b>                          | 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               |
| <b>AQIA - SO<sub>x</sub></b>                 | Required for project emission increases in excess                                                                                         | Not Triggered                           | The increase in emissions of this air contaminant from this project does not                                                     | NA               |

|                                   |                                                                                                                                          |               |                                                                                                                                  |    |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------|----|
|                                   | of 25 lbs/hr, 250 lbs/day or 40 ton/yr of SOx calculated as SO2                                                                          |               | exceed any of these levels, so no AQIA is required.                                                                              |    |
| <b>AQIA - CO</b>                  | 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 |
| <b>20.2(d)(3) - PSD</b>           | Applicable to source that may have a significant impact on a class I area                                                                | NA            | Emissions from this engine do not trigger PSD requirements.                                                                      | NA |
| <b>20.2(d)(4) - Public Notice</b> | 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**

The PTE for NOx for the engine is 12 lbs./day, greater than the 10 lbs./day threshold for BACT. While the threshold was triggered, this engine is a tier 4 final which is considered BACT for this equipment type.

#### **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 5: Rule 1200 Applicable Requirements and Discussion**

| Question                                                              | Answer            | Discussion                                                                                                                                                                      |
|-----------------------------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Does the application result in an increase in toxic emissions?</b> | Yes               | The application results in an increase in toxic emissions of Diesel Particulate Matter or specific trace heavy metals and organics (as shown in emission calculations section). |
| <b>Do any special exemptions apply to this equipment?</b>             | No                | No exemptions apply to this equipment                                                                                                                                           |
| <b>Are there any other applications that are part of the project?</b> | No                | NA                                                                                                                                                                              |
| <b>What type of HRA was used?</b>                                     | Refined           | Engine did not pass De Minimis and was sent for a refined HRA. The engine was evaluated for 4x different locations. Results attached.                                           |
| <b>Is the Project Equipped with T-BACT?</b>                           | Yes               | This engine is a tier 4 final, with a P-TOX DPF, which is considered T-BACT for this equipment type.                                                                            |
| <b>Cancer Risk increase (per one million)</b>                         | 0.11              | Project meets standard of one in one million.                                                                                                                                   |
| <b>Chronic HHI</b>                                                    | $3.06E-05 \leq 1$ | Meets standard of one.                                                                                                                                                          |
| <b>Acute HHI</b>                                                      | $3.82E-02 \leq 1$ | Meets standard of one.                                                                                                                                                          |
| <b>Passes Rule 1200?</b>                                              | Yes               | Maintenance and testing (non-emergency operation) must be limited by permit conditions to 50 hours per calendar year                                                            |

*The HRA was assessed at 4x locations that this engine will be allowed to operate. The results of the HRA with the highest values were reported above. All other locations have a lower or similar HRA result that does not exceed the above limits.*

*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 multiple schools (Saint Rose of Lima; Chula Vista Middle; Wegeforth Elementary; Pacific View Charter), 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 regarding 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.

**ENGINEERING EVALUATION  
AUTHORITY TO CONSTRUCT**

**Table 6a: State and Federal Requirement Discussion (Stationary ATCM)**

| <b>Applicable Section</b>     | <b>Requirement</b>                                                                                                                                                                                                | <b>Engine<br/>Complies/Expect<br/>ed to Comply?</b> | <b>Explanation</b>                                                                                                                                                                                                  | <b>Condition</b> |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| <b>Stationary ATCM</b>        |                                                                                                                                                                                                                   |                                                     |                                                                                                                                                                                                                     |                  |
| <b>93115.3</b>                | There are no exemptions that apply to this engine                                                                                                                                                                 | NA                                                  | This engine is not one of the engines exempted from any applicable requirements                                                                                                                                     | NA               |
| <b>93115.4</b>                | 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           |
| <b>93115.5</b>                | 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           |
| <b>93115.6(a)(1)</b>          | 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                                                 | This engine is equipped with a DPF which lowers the engine's PM-10 emission level to <0.01 g/bhp-hr, therefore it is exempt from this rule.                                                                         | N/A              |
| <b>93115.6(a)(2)</b>          | Allows for engine to be started 30 minutes prior to rotating outage                                                                                                                                               | Yes                                                 | Permit conditions specify this requirement.                                                                                                                                                                         | C28560           |
| <b>93115.6(a)(3)(A)(1)(b)</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. This is a tier 4 FINAL engine, therefore complies. | NA               |

ENGINEERING EVALUATION  
AUTHORITY TO CONSTRUCT

|                               |                                                                                                                                                                                                                                                     |     |                                                                                                                                                                                         |        |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| <b>93115.6(a)(3)(A)(1)(c)</b> | Restricts maintenance and testing operation to no more than 50 hours per calendar year                                                                                                                                                              | Yes | Permit conditions specify this requirement.                                                                                                                                             | C28643 |
| <b>93115.6(c)</b>             | 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 |
| <b>93115.10(a)-(b)</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     |
| <b>93115.10(d)</b>            | 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. | C28419 |
| <b>93115.10(f)</b>            | 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                                                                                                    | C46473 |
| <b>93115.10(f)</b>            | 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 |
| <b>93115.10(f)</b>            | 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 |

|                    |                                                                                                                                                                                                                   |     |                                                                                                                                |    |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------------------------------------------------------------------------------------------------------------------------------|----|
| <b>93115.13(a)</b> | 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 |
| <b>93115.13(f)</b> | 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  | The engine is a certified Tier 4 engine that uses an OEM DPF; therefore, does not require additional compliance demonstration. | NA |

**Table 6a: State and Federal Requirement Discussion (Stationary ATCM)**

| <b>Applicable Section</b>    | <b>Requirement</b>                                                                                            | <b>Engine Complies/Expected to Comply?</b> | <b>Explanation</b>                                                                                                                     | <b>Condition</b> |
|------------------------------|---------------------------------------------------------------------------------------------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|------------------|
| <b>NESHAP ZZZZ</b>           |                                                                                                               |                                            |                                                                                                                                        |                  |
| <b>40 CFR 63.6590(b)-(c)</b> | Requires that new emergency engines comply with the NESHAP by complying with the applicable NSPS              | Yes                                        | See NSPS section below.                                                                                                                | NA               |
| <b>NSPS IIII</b>             |                                                                                                               |                                            |                                                                                                                                        |                  |
| <b>40 CFR 60.4205</b>        | Requires that engines meet emission limits equivalent to tier 3 levels (tier 2 for engines 750 bhp or higher) | Yes                                        | This engine is certified to Tier 4 Final standards, and therefore is not subject to alternative compliance demonstration requirements. | NA               |
| <b>40 CFR 60.4207</b>        | 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           |
| <b>40 CFR 60.4209</b>        | Requires installation of a non-resettable hour meter                                                          | Yes                                        | Permit conditions require the installation and use of a non-resettable hour meter.                                                     | C28419           |

ENGINEERING EVALUATION  
AUTHORITY TO CONSTRUCT

|                          |                                                                                                                                                                                         |     |                                                                                                                                                                                                                                                                                                                               |                              |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| <b>40 CFR 60.4211(a)</b> | 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                       |
| <b>40 CFR 60.4211(c)</b> | 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) with PM emission below this level satisfies this requirement. This is a tier 4 FINAL engine, therefore complies.                                                                                                           | NA                           |
| <b>40 CFR 60.4211(e)</b> | 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,<br>C40907,<br>C28643 |
| <b>40 CFR 60.4214(b)</b> | Requires records of operation to show that engine is operated as an emergency engine                                                                                                    | Yes | Compliance is expected and specified in permit conditions.                                                                                                                                                                                                                                                                    | C46473                       |
| <b>40 CFR 60.4214(c)</b> | For engines with DPFs, requires records of corrective actions taken when the high backpressure limit is approached                                                                      | NA  | The engine is a certified Tier 4 engine that uses a DPF. Therefore, the engine relies on the onboard monitoring to ensure proper operation of the DPF, and this onboard monitoring fulfills this requirement. Permit conditions specify following manufacturer's instructions which ensures compliance with this requirement. | 43433                        |
| <b>40 CFR 60.7(f)</b>    | 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                       |

## ENGINEERING EVALUATION ATTACHMENTS

### 4.6 Title V.

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

### 4.7 CEQA.

CEQA requires government agencies, such as air districts, to consider the environmental consequences of their actions before approving plans and policies or committing to a course of action on a project.

*The project being permitted is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) under Article 19 of the CEQA Guidelines. Specifically, the project is exempt under Section §15303, which includes projects that involve the new construction of accessory structures and the installation of small new equipment and facilities in small structures. This exemption is appropriate as the project falls within the scope of established exemptions that recognize the negligible impact of such activities on the environment and is not subject to any of the exceptions to the Categorical Exemptions listed in Section 15300.2 of the CEQA Guidelines. Consequently, no further environmental review is required.*

### 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

Unapproved CON set APCD2026-CON-002396 as a base with a 50 hour/year limit for non-emergency/maintenance and testing. Modified condition set to include the following condition:

- NEW\_1: "Equipment operation shall be allowed at the locations specified in the equipment description"

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