

DRAFT
ENGINEERING EVALUATION
Safeway, Inc.
Plant No.22849
Application No: 26865

BACKGROUND

Safeway, Inc., of Vallejo has applied for a Permit to Operate a standby generator powered by Natural Gas engine (S-1). The engine is located at 709 Lincoln Road Vallejo, CA 94590.

S-1 Emergency Standby Generator Set: Natural Gas Engine Make: GM; Model: 4.3L V6; Model Year; 2002; Rated Horsepower: 56 HP; Abated by A-1 Nett Technologies TC-102 Series Catalytic Converter

EMISSIONS

The 56 hp Natural Gas engine was tested and the emission factors are listed below in table (1). For this report, it is assumed that the emission value of Total Unburned Hydrocarbons (HC) is equivalent to the emission value of POC.

Abatement Device: The engine is equipped with a Catalyst/Silencer abatement device.

Table (1)

Component	Controlled Emission (g/bhp·hr)
NO _x	0.17
CO	1.36
POC	0.06
PM ₁₀	Negligible

**The emission factor for SO₂ is from Chapter-3, Table 3.2-2 of the EPA Document AP-42, Emission Factors for 4-Stroke Rich-Burn Engines. SO₂:5.88E-4 lb/MMBtu*

Manufacturer guarantees emission factors at BAAQMD BACT Standards

Maximum Emissions in Tons per year:

Table
(2)

NOx	=	(0.17 g/bhp-hr)	(56hp)	(50 hr)	(454 g/lb)	=	1.04 lb/yr	0.000 TPY
CO	=	(1.36 g/bhp-hr)	(56hp)	(50 hr)	(454 g/lb)	=	8.38 lb/yr	0.004 TPY
POC	=	(0.06 g/bhp-hr)	(56hp)	(50 hr)	(454 g/lb)	=	0.37 lb/yr	0.000 TPY
PM10	=	(0.00 g/bhp-hr)	(56hp)	(50 hr)	(454 g/lb)	=	0.000 lb/yr	0.000 TPY
SO2	=	(0.0058 g/bhp-hr)	(56hp)	(50 hr)	(454 g/lb)	=	0.035 lb/yr	0.000 TPY

Maximum Daily Emissions:

A full 24-hour day will be assumed since no daily limits are imposed on intermittent and unexpected operations. Check Table (3) for emissions per day.

Table (3)

NOx	=	(0.17 g/hp-hr)	(56 hp)	(24 hr)	(454 g/lb)	=	0.503 lb/day
CO	=	(1.36 g/bhp-hr)	(56 hp)	(24 hr)	(454 g/lb)	=	4.02 lb/day
POC	=	(0.06 g/bhp-hr)	(56 hp)	(24 hr)	(454 g/lb)	=	0.177 lb/day
PM10	=	(0.00 g/bhp-hr)	(56 hp)	(24 hr)	(454 g/lb)	=	0.000 lb/day
SO2	=	(0.0058 g/hp-hr)	(56 hp)	(24 hr)	(454 g/lb)	=	0.017 lb/day

Plant Cumulative Increase: (tons/year): Cumulative increase from the plant is as shown in Table (4).

Table (4)

Plant Cumulative Increase: (tons/year)

Pollutant	Existing	New S-1	Total TPY
NOx	0.000	0.000	0.000
CO	0.000	0.004	0.004
POC	0.000	0.000	0.000
PM10	0.000	0.000	0.000
SO2	0.000	0.000	0.000

Toxic Risk Screening:

Emission factors for a 4-stroke rich-burn Natural Gas engine will be used to estimate the emissions from the engine. Emissions factors are from the California Air Toxic Emission Factors. S-1 is not in excess of any of the risk screening triggers for the CATEF table. A Risk Screening Analysis is not required.

	Compound Name	CATEF Emission Factor lb/MMcf (Fuel Input)	Emission Factor lb/Mmbtu	Calculated Emission (lbs/yr)	TAC Trigger Levels in lb/yr
Trace Organic Compounds					
	1,3-Butadiene	1.05E-01	1.00E-04	0.00	1.10
	Acetaldehyde	1.82E+00	1.73E-03	0.02	64.00
	Benzene	1.02E+01	9.71E-03	0.13	6.40
	Formaldehyde	5.77E+00	5.50E-03	0.07	30.00
	Naphthalene	8.66E-02	8.25E-05	0.00	5.30
	PAH	2.54E-07	2.42E-10	0.00	0.01
	Toluene	2.62E+00	2.50E-03	0.03	12000.00
	Xylene	7.38E-02	7.03E-05	0.00	27000.00

	insert MMBTU/yr	1.28E+01			
Note: fuel usage is based on 245.1 scf/hr, 1050 btu/scf, 50 hr/yr = 12.86 MMBtu/yr					

Public Notification:

Since this plant is located within 1000 feet of a school, public notification is required.

STATEMENT OF COMPLIANCE

S-1 is subject to the monitoring and record keeping requirements of Regulation 9-8-530 and the SO₂ limitations of 9-1-301 (ground-level concentration) and 9-1-304 (0.5% by weight in fuel). Regulation 9-8-530 requirements are incorporated into the proposed permit conditions. Like all sources, S-1 is subject to Regulation 6, Rule 1 ("Particulate and Visible Emissions"). The engine is not expected to produce visible emissions or fallout in violation of this regulation and it will be assumed to comply with Regulation 6 pending a regular inspection. Emergency use of emergency standby engines is not subject to Toxics Risk Screening per 2-5-111.

California Environmental Quality Act (CEQA):

This application is considered ministerial under the District's proposed CEQA guidelines (Regulation 2-1-312), and Permit Handbook chapter 2.3.1 The application therefore is not subject to CEQA review.

Offsets: Offsets must be provided for any new or modified source at a facility that emits more than 10 tons/yr of Precursor Organic Compounds or Nitrogen Oxides. Based on the emission calculations above, offsets are not required for this application.

New Source Performance Standard (NSPS) in 40 CFR 60, Subpart JJJJ does not apply because the engine is an emergency engine manufactured before January 1, 2009.

National Emission Standard for Hazardous Air Pollution (NESHAP): This engine is not subject to the Reciprocating Internal Combustion Engine (RICE) NESHAP (40 CFR Part 63, Subpart ZZZZ), because it is an existing emergency engine at a commercial site per section 63.6585(f)(2).

Preventive of Significant Deterioration (PSD) does not apply.

PERMIT CONDITIONS

Conditions for S-1 Emergency Standby Natural Gas Generator Set, at Plant: 22850

COND# 23107

1. The owner or operator shall operate the stationary emergency standby engine only to mitigate emergency conditions or for reliability-related activities maintenance and testing). Operating while mitigating emergency conditions and while emission testing to show compliance with this part is unlimited. Operating for reliability-related activities is limited to 50 hours per year.

(Basis: Emergency Standby Engines, Hours of Operation Regulation 9-8-330)

2. The Owner/Operator shall equip the emergency standby engine(s) with: a non-resettable totalizing meter that measures hours of operation or fuel usage.

(Basis: Emergency Standby Engines, Monitoring and Record keeping 9-8-530)

3. The Owner/Operator shall not operate unless the natural gas fired engine is abated with a Catalytic Converter/Silencer Unit

(Basis: Cumulative Increase)

4. Records: The Owner/Operator shall maintain the following monthly records in a District-approved log for at least 24 months from the date of entry. Log entries shall be retained on-site, either at a central location or at the engine's location, and made immediately available to the District staff upon request.

- a. Hours of operation (maintenance and testing).
- b. Hours of operation for emission testing.
- c. Hours of operation (emergency).

- d. For each emergency, the nature of the emergency condition.
- e. Fuel usage or operating hours for engine.

(Basis: Emergency Standby Engines, Monitoring and Recordkeeping 9-8-530)

RECOMMENDATION

The District has reviewed the material contained in the permit application for the proposed project and has made a preliminary determination that the project is expected to comply with all applicable requirements of District, state, and federal air quality-related regulations. The preliminary recommendation is to issue an Authority to Construct for the equipment listed below. However, the proposed source will be located within 1000 feet of a school, which triggers the public notification requirements of District Regulation 2-1-412. After the comments are received and reviewed, the District will make a final determination on the permit.

I recommend that the District initiate a public notice and consider any comments received prior to taking any final action on issuance of an Authority to Construct for the following source:

S-1 Emergency Standby Generator Set: Natural Gas Engine Make: Generac; Model: 4.3L V6; Model Year: 2002; Rated Horsepower: 56 HP; Abated by A-1 Nett Technologies TC-102 Series Catalytic Converter

EXEMPTIONS

None.

By: _____ Date: 08-04-2016 _____

Sheryl Wallace
Air Quality Permit Technician

Acronyms			
S-1	Source one	NPOC	Non- Precursor Organic Compound
HP	Horse Power	TBACT	Best Available Control Technology for Toxics
CARB	California Air Resource Board	BACT	Best Available Control Technology
NOx	Oxides of Nitrogen as NO ₂	BAAQMD	Bay Area Air Quality Management District
CO	Carbon Monoxide	IC Engines	Internal Combustion Engines
POC	Precursor Organic Compound	EPA	Environmental Protection Agency
HC	Hydrocarbons	SCR	Selective Catalytic Reduction
PM ₁₀	Particulate Matter	PSD	Prevention of Significant Deterioration
SO ₂	Sulfur Dioxide	NSPS	New Source Performance Standard
O ₂	Oxygen	NESHAPS	National Emission Standard for Hazardous Air Pollutants
ppmv	parts per million by volume	CEQA	California Environmental Quality Act
ATCM	Airborne Toxic Control Measure		