

**Engineering Evaluation
Verizon Wireless (Pinole Valley)
1617 Canyon Drive, Pinole, California 94564
Plant No. 16415 (Site No. B6415)
Application No. 30761**

Project Description: New Emergency Diesel Engine-Generator Set

BACKGROUND

Verizon Wireless – Pinole Valley (Verizon) has applied to obtain an Authority to Construct (A/C) and/or Permit to Operate (P/O) for the following equipment:

- S-2 Stationary Emergency Diesel Engine-Generator Set**
Generator Make: Generac; Generator Model: SD080; Model Year: 2020
Engine Make: FPT Industrial S.p.A.; Engine Model: F4GE9485A*J
Engine Family: LFPXL06.7DGB; Horsepower: 131 BHp
Fuel Rate: 6.84 Gal/Hr; Heat Input: 0.96 MMBtu/Hr

The engine will be replacing an existing engine (S-1) located on 1617 Canyon Drive in Pinole, California. The engine will operate for emergency-use. The engine will operate unrestricted during emergency-use events. Annual maintenance and testing hours will be limited to 50 hours per year. The criteria pollutants associated with the engine are precursor organic compounds (POC), nitrogen oxides (NO_x), particulate matter 10 microns in size (PM₁₀), particulate matter 2.5 microns in size (PM_{2.5}), sulfur dioxide (SO₂), and carbon monoxide (CO). The engine meets the Environmental Protection Agency (EPA) Tier 3 emission standards for engine-generator sets with an engine power rating greater than or equal to 100 horsepower and less than 175 horsepower. The engine will burn commercially available California Air Resources Board (CARB) low sulfur diesel fuel. The sulfur content of the diesel fuel shall not exceed 0.0015% by weight. The operation of the engine should not pose any health threat to the surrounding community or the public at large.

EMISSIONS CALCULATIONS

The applicant has submitted supporting documents, which include engine manufacturer specifications and engine emissions data. The following table provide a summary of the information provided by the applicant.

Table 1. Engine Specifications and Certified Emission Factors	
Engine Manufacturer	FPT Industrial S.p.A.
Model	F4GE9485A*J
Model Year	2020
Family Name	LFPXL06.7DGB
Engine Power Rating (hp)	131
Fuel Consumption¹ (gal/hr)	6.84
Maximum Input Heat Rating¹ (MMBtu/hr)	0.96
Engine Displacement² (cu in)	274.6
Engine Displacement² (L)	4.5

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Table 1. Engine Specifications and Certified Emission Factors (Continued)	
NO_x + NMHC³ (g/hp-hr)	2.80
NO_x³ (g/hp-hr)	2.66
NMHC^{3,4} (g/hp-hr)	0.14
CO (g/hp-hr)	0.70
PM⁵ (g/hp-hr)	0.12

¹ The energy content of diesel fuel is 140,000 Btu per gallon.

² 1 Liter = 61.0237 in³

³ Pursuant to the District *“Permit Handbook – Section 2.3.1 Stationary Diesel Engines”* (Permit Handbook), the emission factor for NO_x + NMHC is assumed to be 5% NMHC and 95% NO_x.

⁴ NMHC = POC

⁵ Particulate Matter (PM) = PM₁₀ = PM_{2.5}

Using the submitted information, the emission rate for each pollutant was determined. The following tables provide the potential to emit (PTE) and cumulative increase. The annual PTE is based on an assumed 100 hours for emergency events, plus allowable hours for maintenance and testing. The cumulative increase is based on allowable hours for maintenance and testing. For further information, please reference *Appendix A. “Project Emissions Review for New Source Review Application”* (Appendix A).

Table 2. Potential to Emit Source Emissions				
Pollutant	Hourly Emission Rate (lb/hr)	Daily Emission Rate¹ (lb/day)	Annual Emission Rate² (lb/yr)	Annual Emission Rate² (ton/yr)
POC	0.04	0.97	6.06	0.003
NO _x	0.77	18.42	115.13	0.058
PM ₁₀	0.03	0.83	5.19	0.003
PM _{2.5}	0.03	0.83	5.19	0.003
SO ₂ ³	0.00	0.03	0.22	0.000
CO	0.20	4.85	30.30	0.015

¹ Maximum daily operation assumed to be 24 hours.

² For the PTE, the maximum annual operation will include reliability-related activities as defined in Regulation 9-8-232 and 100 hours for emergency events.

³ SO₂ emissions are based upon the Permit Handbook. The Permit Handbook suggests the use of EPA AP-42, Table 3.4-1. Assuming a sulfur content of 15 ppm, pursuant to the fuel requirements of CARB, the emission factor equates to 0.001515 lb SO₂/MMBtu.

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Table 3. Cumulative Increase Source Emissions				
Pollutant	Hourly Emission Rate (lb/hr)	Daily Emission Rate (lb/day)	Annual Emission Rate¹ (lb/yr)	Annual Emission Rate¹ (ton/yr)
POC	0.04	0.97	2.02	0.001
NO _x	0.77	18.42	38.38	0.019
PM ₁₀	0.03	0.83	1.73	0.001
PM _{2.5}	0.03	0.83	1.73	0.001
SO ₂	0.00	0.03	0.07	0.000
CO	0.20	4.85	10.10	0.005

¹ For the cumulative increase, the maximum annual operation will only include reliability-related activities as defined in Regulation 9-8-232.

TOXIC RISK SCREENING ANALYSIS

Pursuant to Regulation 2-5-110, a project shall not be subject to this rule if, for each toxic air contaminant (TAC), the total project emissions are below the acute and chronic trigger levels listed in Table 2-5-1 of this regulation. A project includes all new or modified sources of TACs within a 3-year period. No new or modified sources of TACs have been reviewed within the previous 3-year period. Therefore, the project will only include emissions from S-2. The following tables provide a review of the project TAC emission rates.

Table 4. Diesel Exhaust Particulate Matter Source Emissions				
App#	Date Final Disposition	Equipment Description (Source #)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lb/yr)
30761	Received 09/29/2020	Emergency Standby Diesel Generator Set (S-2)	3.5E-02	1.73E+00
Project			3.5E-02	1.73E+00

Table 5. Regulation 2-5 Threshold Review						
Pollutant	Hourly Emission Rate (lb/hr)	Acute Threshold (lb/hr)	Exceeds Acute Threshold? (Yes/No)	Annual Emission Rate (lb/yr)	Chronic Threshold (lb/yr)	Exceeds Chronic Threshold? (Yes/No)
Diesel Exhaust Particulate Matter	3.5E-02	--	--	1.73E+00	2.6E-01	Yes

The project exceeds the listed Table 2-5-1 chronic trigger level for diesel exhaust particulate matter. The project is subject to the requirements of this regulation. The hours of use for emergencies are not included pursuant to Regulation 2-5-111.

Pursuant to a Health Risk Assessment (HRA) completed on November 24, 2020, the maximum project cancer risk is 2.2 in a million and the chronic hazard index (HI) is 0.00075. The project

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is below a cancer risk of 10.0 in a million and a chronic HI of 1.0. Therefore, the project meets the risk requirements of Regulation 2-5-302. Pursuant to Regulation 2-5-301, S-2 exceeds a cancer risk of 1.0 in a million and is subject to Best Available Control Technology for Toxics (TBACT). S-2 meets TBACT with a diesel exhaust particulate matter emission factor equal to or less than 0.15 g/hp-hr.

The following table provides a summary of the HRA for each receptor.

Table 6. Health Risk Assessment Summary		
Receptor	Cancer Risk (in a million)	Chronic Hazard Index
Resident	2.2	0.00060
Worker	0.98	0.00075
Student: Pinole Middle School	0.20	0.00011

BEST AVAILABLE CONTROL TECHNOLOGY

Pursuant to Regulation 2-2-301, Best Available Control Technology (BACT) shall apply to new or modified sources with a PTE equal to or greater than 10 lb per highest day of any single regulated air pollutant. S-2 will emit more than 10 lb/day of NO_x. Therefore, S-2 is subject to BACT for NO_x.

BACT for a stationary emergency diesel engine is presented in the “BAAQMD BACT Guideline – IC Engine-Compression Ignition: Stationary Emergency, Non-Agricultural, Non-Direct Drive Fire Pump” (BACT Guideline). The following table provides a summary of the BACT requirements.

Table 7. Stationary Emergency Diesel Engine BACT Requirements			
Pollutant	BACT Requirement	Engine Emission Factor (g/hp-hr)	Compliant with BACT Requirement?
NO _x	CARB ATCM Standard for NMHC+NO _x at the applicable power rating, which is 3.0 g/hp-hr for engines rated greater than or equal to 100 and less than 175 hp.	2.8	Yes

S-2 meets the requirements of BACT.

OFFSETS

Pursuant to Regulation 2-2-302, offsets must be provided for any new or modified source at a facility that emits, or is permitted to emit, more than 10 tons per year of POC or NO_x. Furthermore, pursuant to Regulation 2-2-303 offsets must be provided for any new or modified source at a major facility with a cumulative increase that exceeds 1.0 ton per year of PM₁₀, PM_{2.5}, or SO₂. For purposes of Regulation 2-2-303, a major facility is defined as a facility that is permitted to emit 100 tons per year or more of PM₁₀, PM_{2.5}, or SO₂.

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The following table provides a summary of the facility's PTE.

Table 8. Facility Potential to Emit Review				
Pollutant	Existing Potential to Emit¹ (ton/yr)	Proposed Emission Decrease² (ton/yr)	New Emission Increase (ton/yr)	New Potential to Emit (ton/yr)
POC	0.005	(0.005)	0.003	0.003
NO _x	0.080	(0.080)	0.058	0.058
PM ₁₀	0.001	(0.001)	0.003	0.003
PM _{2.5}	0.001	(0.001)	0.003	0.003
SO ₂	0.003	(0.003)	0.000	0.000
CO	0.012	(0.012)	0.015	0.015

¹ Emissions information obtained from New Source Review Application #10738.

² Verizon is proposing to replace S-1, which is the only source contributing to the existing PTE.

Verizon has a PTE less than 10 tons per year of POC and NO_x. Therefore, the facility is not subject to the offset requirements of Regulation 2-2-302. Furthermore, the facility is not a major facility for PM₁₀, PM_{2.5}, or SO₂. Therefore, the facility is not subject to the offset requirements of Regulation 2-2-303.

The following table provides a summary of the facility's cumulative increase.

Table 9. Facility Cumulative Increase Review				
Pollutant	Existing Cumulative Increase¹ (ton/yr)	Proposed Emission Decrease² (ton/yr)	New Emission Increase (ton/yr)	New Cumulative Increase (ton/yr)
POC	0.001	(0.001)	0.001	0.001
NO _x	0.018	(0.018)	0.019	0.019
PM ₁₀	0.000	(0.000)	0.001	0.001
PM _{2.5}	0.000	(0.000)	0.001	0.001
SO ₂	0.001	(0.001)	0.000	0.000
CO	0.003	(0.003)	0.005	0.005

¹ Emissions information obtained from New Source Review Application #10738.

² Verizon is proposing to replace S-1, which is the only source contributing to the existing PTE.

NEW SOURCES PERFORMANCE STANDARDS

The engine is subject to the following New Source Performance Standards (NSPS).

40 CFR Part 60, Subpart III

According to §60.4200(a)(1)(i), the engine is subject to the requirements of this subpart.

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Pursuant to §60.4205(b), owners or operators of 2007 model year and later stationary emergency diesel engine-generator sets with a displacement of less than 30 liters must comply with §60.4202. In accordance with §60.4202(a)(2), the emission standards must meet those established in 40 CFR 89.112 and 40 CFR 89.113.

Pursuant to 40 CFR 89.112, engines with a rated power greater than or equal to 75 kW (100 hp) and less than 130 kW (175 hp) must meet the following emission standards.

Table 10. Review of NSPS Standards for Engines 75 kW to 130 kW			
Pollutant	NSPS Emission Standard (g/kW-hr)	NSPS Emission Standard (g/hp-hr)	Manufacturer's Emission Rate (g/hp-hr)
NO _x + NMHC	4.0	3.0	2.8
CO	5.0	3.7	0.7
PM	0.30	0.22	0.12

The aforementioned analysis demonstrates that the engine will meet the emission standards of 40 CFR 89.112. In addition, the engine is expected to meet the following opacity standards identified in 40 CFR 89.113.

Table 11. 40 CFR 89.113 Opacity Standards	
Mode	Opacity (%)
Acceleration	20
Lugging	15
Peak (During acceleration or lugging modes)	50

§60.4206 and §60.4211(a) require the owner or operator to maintain and operate the engine according to the manufacturer's written instructions or owner/operator developed procedures approved by the manufacturer for the entire life of the engine. The engine is expected to be maintained and operated in accordance with the requirements of §60.4206 and §60.4211(a).

§60.4207(b) requires diesel fuel consumed after October 1, 2010 to meet the requirements of 40 CFR 80.510(b), which is a maximum sulfur content of 15 parts per million (ppm). The fuel consumed is expected to meet this requirement.

§60.4209(a) requires the installation of a non-resettable hour meter. This will be included as a permit requirement.

The engine is certified to the requirements of 40 CFR Part 89 and is expected to comply with §60.4211(c).

Per §60.4211(f), the engine will be allowed to operate unrestricted during emergencies. In addition, the engine will be limited to less than 100 hours per calendar year for maintenance and testing. However, the requirements of the CARB Airborne Toxic Control Measure (ATCM) may further limit the maintenance and testing hours.

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NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

The engine is subject to the following National Emission Standards for Hazardous Air Pollutants (NESHAP).

40 CFR Part 63, Subpart ZZZZ

Pursuant to §63.6585(c), engines located at an area source of hazardous air pollutants (HAP) are subject to the requirements of this subpart.

However, according to §63.6590(a)(1)(iii) & §63.6590(c)(1), compression ignition engines that commenced construction on June 12, 2006 or later and that operate at a facility that emits or has the potential to emit any single HAP at a rate of less than 10 tons per year or any combination of HAPs at a rate of less than 25 tons per year, must comply instead with 40 CFR Part 60 Subpart III, “Standards of Performance of Stationary Compression Ignition Internal Combustion Engines.” The engine is expected to meet the requirements of this subpart by meeting the standards of 40 CFR Part 60 Subpart III, “Standards of Performance of Stationary Compression Ignition Internal Combustion Engines.”

CALIFORNIA AIR RESOURCES BOARD AIRBORNE TOXIC CONTROL MEASURE FOR STATIONARY COMPRESSION IGNITION ENGINES

§93115.2 requires any person who purchases a stationary compression ignition engine to meet the requirements of the ATCM.

As of January 1, 2006, owners and operators of new engines are required to consume CARB diesel fuel in accordance with §93115.5.

According to §93115.6(a)(1), an engine located within 500 feet of school grounds shall not operate for non-emergency use between 7:30 A.M. and 3:30 P.M. on days when school is in session. However, the source is not located within 500 feet of school grounds. Although, this requirement will be part of a standard permit condition.

Pursuant to §93115.6(a)(3), a new engine must meet the following requirements as of January 1, 2005.

- ATCM “Table 1: Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines” for same model year and maximum engine power, which is shown below;

Table 12. ATCM <u>“Table 1 Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines”</u>				
Maximum Engine Power	Model Year	PM (g/bhp-hr)	NMHC+NO_x (g/bhp-hr)	CO (g/bhp-hr)
100 ≤ hp < 175 (75 ≤ kW < 130)	2008+	0.15	3.0	3.7

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- After December 31, 2008, be certified to the new non-road compression-ignition engine emission standard for all pollutants for 2007 and later model year engines as specified in 40 CFR, Part 60, Subpart III; and,
- Not operate more than 50 hours per year for maintenance and testing purposes, except as provided in §93115.6(a)(3)(A)(2). This regulation does not limit engine operation for emergency use and for emission testing to show compliance with §93115.6(a)(3).

The engine is expected to meet the aforementioned emission requirements and will be limited, through permit condition, to operate unrestricted only for emergencies and a maximum of 50 hours per year for maintenance and testing purposes. In addition, the permit will include near-school operating provisions that meet the requirements of §93115.6(a)(1).

Pursuant to §93115.10(d)(1) a non-resettable hour meter with a minimum display capability of 9,999 hours shall be installed upon engine installation. The owner/operator of the engine shall keep monthly records of the following for a minimum of 36 months, with the prior 24 months readily accessible at the site and the prior 25 to 36 months available to the District within 5 working days from the request.

- Emergency use hours of operation;
- Maintenance and testing hours of operation;
- Hours of operation for emission testing to show compliance with §93115.6(a)(3) and §93115.6(b)(3);
- Initial start-up testing hours;
- If applicable, hours of operation to comply with the requirements of NFPA 25;
- Hours of operation for all uses other than those specified in §93115.10(g)(1)(A) through (D);
- If applicable, DRP engine hours of operation; and,
- The fuel used.

STATEMENT OF COMPLIANCE

Regulation 6, Rule 1

Pursuant to Regulation 6-1-303 a person shall not emit, from an internal combustion engine with less than a 25-liter displacement, for a period or periods aggregating more than three minutes in any hour, a visible emission that is as dark or darker than No. 2 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree, nor shall said emission, as perceived by an opacity sensing device in good working order, where such device is required by District Regulations, be equal to or greater than 40% opacity. The engine is expected to meet the requirements of Regulation 6-1-303.

Regulation 9, Rule 1

The engine is subject to the SO₂ limitations of Regulation 9-1-301 (Limitations on Ground Level Concentrations of Sulfur Dioxide), Regulation 9-1-302 (Limitations Sulfur Dioxide Emissions) and 9-1-304 (Burning of Solid and Liquid Sulfur Dioxide Fuel). Pursuant to Regulation 9-1-301, the ground level concentrations of SO₂ shall not exceed 0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24

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hours. Pursuant to Regulation 9-1-302, a person shall not emit from any source, a gas stream containing SO₂ in excess of 300 ppm (dry). Lastly, pursuant to Regulation 9-1-304, a person shall not burn any liquid fuel having a sulfur content in excess of 0.5% by weight. Compliance with Regulation 9-1 is expected due to the use of CARB low sulfur diesel fuel with a sulfur content of 0.0015% by weight.

Regulation 9, Rule 8

This rule limits the emissions of NO_x and CO from stationary internal combustion engines with an output rated by the manufacturer at more than 50 brake horsepower. The engine is intended to operate at a specific site for more than one year and will be attached to a foundation at the site. Therefore, the requirements of this rule apply.

In addition, the engine will be used for emergency use and is defined as an emergency standby engine pursuant to Regulation 9-8-230.

Per Regulation 9-8-110.5, emergency standby engines are exempt from the requirements of Regulations 9-8-301 through 305, 9-8-501, and 9-8-503. However, emergency standby engines are subject to the requirements of Regulation 9-8-330. Pursuant to Regulation 9-8-330, the engine will be allowed to operate 50 hours per calendar year for reliability-related activities. The requirements of the CARB ATCM are equivalent to the allowed annual reliability-related activity hours of this rule.

In accordance with Regulation 9-8-530, the engine shall be equipped with a non-resettable totalizing meter that measures hours of operation or fuel usage. Monthly records for the following shall be kept for at least 2 years and be made available to District staff upon request.

- Total hours of operation;
- Emergency hours of operation; and,
- The nature of the emergency condition for each emergency.

The engine is expected to meet the requirements of this regulation.

California Environmental Quality Act and Regulation 2-1

Pursuant to Regulation 2-1-311, an application for a proposed new or modified source will be classified as ministerial and will accordingly be exempt from the California Environmental Quality Act (CEQA) requirement of Regulation 2-1-310 if the District's engineering evaluation and basis for approval or denial of the permit application for the project is limited to the criteria set forth in Regulation 2-1-428 and to the specific procedures, fixed standards, and objective measurements set forth in the District's Permit Handbook and BACT/TBACT Workbook. The evaluation of the proposed project was performed in accordance with comparable criteria set forth in Chapter 2.3.1 of the Permit Handbook and is considered ministerial.

California Health & Safety Code §42301.6 and Regulation 2-1-412

Pursuant to California Health & Safety Code §42301.6(a), prior to approving an application for a permit to construct or modification of a source, which is located within 1,000 feet from the outer

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boundary of a school site, the District shall prepare a public notice as detailed in §42301.6. §42301.9(a) defines a “school” as any public or private school used for the purposes of the education of more than 12 children in kindergarten or any grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in private homes.

The applicant has proposed to install the engine within 1,000 feet from the outer boundary of the following school site(s) identified in the following table.

Table 13. School Sites Located Within 1,000 Feet of the Equipment			
School Name	School Location	Grades	Description
Pinole Middle School	1575 Mann Drive Pinole, CA 94564	7-8	Public

The District will be required to prepare a public notice as detailed in §42301.6.

PERMIT CONDITIONS

Permit Condition #22850

1. The owner/operator shall not exceed 50 hours per year per engine for reliability-related testing. [Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]
2. The owner/operator shall operate each emergency standby engine only for the following purposes: to mitigate emergency conditions, for emission testing to demonstrate compliance with a District, State or Federal emission limit, or for reliability-related activities (maintenance and other testing, but excluding emission testing). Operating while mitigating emergency conditions or while emission testing to show compliance with District, State or Federal emission limits is not limited. [Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]
3. The owner/operator shall operate each emergency standby engine only when a non-resettable totalizing meter (with a minimum display capability of 9,999 hours) that measures the hours of operation for the engine is installed, operated and properly maintained. [Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]
4. Records: The owner/operator shall maintain the following monthly records in a District-approved log for at least 36 months from the date of entry (60 months if the facility has been issued a Title V Major Facility Review Permit or a Synthetic Minor Operating Permit). 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 for reliability-related activities (maintenance and testing).
 - b. Hours of operation for emission testing to show compliance with emission limits.
 - c. Hours of operation (emergency).
 - d. For each emergency, the nature of the emergency condition.
 - e. Fuel usage for each engine(s).

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[Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

5. At School and Near-School Operation: If the emergency standby engine is located on school grounds or within 500 feet of any school grounds, the following requirements shall apply:

The owner/operator shall not operate each stationary emergency standby diesel-fueled engine for non-emergency use, including maintenance and testing, during the following periods:

- a. Whenever there is a school sponsored activity (if the engine is located on school grounds).
- b. Between 7:30 a.m. and 3:30 p.m. on days when school is in session. "School" or "School Grounds" means any public or private school used for the purposes of the education of more than 12 children in kindergarten or any of grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in a private home(s). "School" or "School Grounds" includes any building or structure, athletic field, or other areas of school property but does not include unimproved school property.

[Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

End of Conditions

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 1,000 feet of a school, which triggers the public notification requirement 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 the issuance of an Authority to Construct for the following source:

S-2 Stationary Emergency Diesel Engine-Generator Set
Generator Make: Generac; Generator Model: SD080; Model Year: 2020
Engine Make: FPT Industrial S.p.A.; Engine Model: F4GE9485A*J
Engine Family: LFPXL06.7DGB; Horsepower: 131 BHp
Fuel Rate: 6.84 Gal/Hr; Heat Input: 0.96 MMBtu/Hr

By: _____
Alfonso Borja
Senior Air Quality Engineer

Date: _____