

# ENGINEERING EVALUATION

Facility ID No. 202934  
Edison Technology Park, MP, LP  
3475 Edison Way, Menlo Park, CA 94025  
Application No. 673547

## Background

Edison Technology Park, MP, LP is applying for an Authority to Construct/Permit to Operate for the following equipment:

**S-1 Emergency Standby Diesel Generator Set**  
**Make: John Deere, Model: 6068HFG85,**  
**Year: 2022, 315 bhp, 2.12 MMBtu/hr**

The criteria pollutants are nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), precursor organic compounds (POC) from unburned diesel fuel, sulfur dioxide (SO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). All of these pollutants are briefly discussed on the District's web site at [www.baaqmd.gov](http://www.baaqmd.gov).

S-1 will power an emergency fire pump and meets the Environmental Protection Agency and California Air Resources Board (EPA/CARB) Tier 3 Off-road standard. The engine will burn commercially available California low sulfur diesel fuel. The sulfur content of the diesel fuel will not exceed 0.0015% by weight.

This evaluation report will discuss compliance of the proposed project with all applicable rules and regulations.

## Emissions

**Table 1. Annual and Daily Emissions from EPA/CARB Certified Data for S-1.**

Pollutant	Emission Factor (g/bhp-hr)	Max Daily Emissions (lb/day)	Annual Emissions (lb/yr)	Annual Emissions (tons/yr)
NO <sub>x</sub>	2.47	41.13	85.77	0.043
POC	0.08	1.33	2.78	0.001
CO	0.45	7.49	15.63	0.008
PM <sub>10</sub> /PM <sub>2.5</sub> <sup>1</sup>	0.07	1.17	2.43	0.001
SO <sub>2</sub>	N/A <sup>2</sup>	0.09	0.19	0.000

### Basis:

- Annual emissions: Reliability-related activity 50 hours.
- Max daily emissions: 24-hour operation
- Emissions from Carryover EPA Engine Family CJDXL13.5103 for S-1
- <sup>1</sup> Conservative Assumption: All PM emissions are PM<sub>2.5</sub>
- <sup>2</sup> SO<sub>2</sub> emission factor from AP-42 Table 3.4-1, SO<sub>2</sub> (15 ppm) = 0.00809\*0.0015 lb SO<sub>2</sub>/bhp-hr

### **Plant Cumulative Increase**

Table 2 summarizes the cumulative increase in criteria pollutant emissions that will result from this application. Cumulative increase considers 50 hours of operation per year for S-1.

**Table 2. Plant Cumulative Emissions Increase, Post 4/5/91**

<b>Pollutant</b>	<b>Existing Emissions Post 4/5/91 (tons/yr)</b>	<b>Application Emissions (tons/yr)</b>	<b>Cumulative Emissions (tons/yr)</b>
NO <sub>x</sub>	0.000	0.043	0.043
POC	0.000	0.001	0.001
CO	0.000	0.008	0.008
PM <sub>10</sub> /PM <sub>2.5</sub>	0.000	0.001	0.001
SO <sub>2</sub>	0.000	0.000	0.000

### **Health Risk Assessment (HRA)**

All PM<sub>10</sub> emissions are considered diesel particulate emissions. The PM<sub>10</sub> emissions from this application are summarized in Table 1. There were no other related projects permitted in the last five years. Since the diesel particulate emissions from the project are greater than the toxic trigger level of 0.26 lb/year, an HRA is required. This application did not qualify for HRA streamlining.

### **HRA Results**

This analysis estimates the incremental health risk resulting from toxic air contaminant (TAC) emissions from non-emergency operation of a standby generator diesel engine at this facility. Results from the HRA indicate that the project cancer risk is 1.8 in a million and the project chronic hazard index (HI) is 0.00049. In accordance with District Regulation 2-5-301, the proposed new source requires TBACT because the estimated source risk is greater than a cancer risk of 1.0 in a million and/or a chronic HI of 0.20. See HRA Report for more details.

### **TBACT**

In accordance with the District's Regulation 2-5-301, S-1 requires TBACT because the estimated source cancer risk is greater than 1.0 in a million. BACT and TBACT determinations for compression ignition engines with a rated capacity between 50-1000 bhp are described in BAAQMD BACT/TBACT Workbook for IC Engines – Compression Ignition: Stationary Emergency, non-Agricultural, non-direct drive fire pump, Document #96.1.3, Revision 8, dated 12/22/2020). S-1 complies with TBACT because PM emission factor is less than 0.15 g/bhp-hr. Emissions from S-1 are 0.07 g/bhp-hr. for PM.

### **Project Risk Limits**

Since the proposed engine, operating at 50 hours/year for reliability-related testing complies with TBACT, and the estimated project cancer risk does not exceed 10 in a million and the chronic hazard index does not exceed 1.0, this project complies with the District's Regulation 2-5-302 project risk requirements.

### **Best Available Control Technology (BACT)**

In accordance with Regulation 2-2-301, BACT is triggered for any new or modified source with the potential to emit 10 pounds or more per highest day of POC, NPOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, or PM<sub>10</sub>.

As shown in Table 1, emissions of NO<sub>x</sub> exceed 10 pounds per day and thus trigger BACT requirements.

Per Section 2-2-202, BACT is defined as an emission limitation, control device, or control technique applied at a source that is the most stringent of:

- the most effective device or technique successfully utilized,
- the most stringent emission limitation achieved by an emission control device or technique for the type of equipment comprising such a source,
- the most effective emission control limitation for the type of equipment comprising such a source that is contained in an approved implementation plan of any state, or
- the most effective control device or technique or most stringent emission limitation that is technologically feasible, taking into consideration cost-effectiveness, any ancillary health and environmental impacts, and energy requirements.

These requirements are generally categorized as either technologically feasible and cost-effective (termed “BACT 1”) or achieved-in-practice (termed “BACT 2”).

BACT 2 is either equal to or less stringent than BACT 1. Because achieved-in-practice is required regardless of cost and BACT 1 is more stringent than BACT 2, an evaluation for what has been achieved-in-practice is first conducted.

#### *Achieved-in-Practice.*

Achieved-in-practice BACT is presented in the current BAAQMD BACT/TBACT Workbook for IC Engine – Compression Ignition: Stationary Emergency, non-Agricultural, non-direct drive fire pump 50 BHP and < 1000 BHP Output, Document #96.1.3, Revision 8, dated 12/22/2020.

For NO<sub>x</sub> and CO, achieved-in-practice BACT has been determined to be meeting the CARB Air Toxics Control Measure (ATCM) standard for the respective pollutant at the applicable horsepower rating.

#### *Technologically Feasible and Cost-Effective.*

The following control technologies and mitigation measures have been found technically feasible for abating NO<sub>x</sub> emissions from internal combustion engines<sup>1</sup>:

- Engine ignition timing retard (achievable NO<sub>x</sub> reduction 20 to 30 percent), and
- Selective catalytic reduction (achievable NO<sub>x</sub> reduction of 90 percent)

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<sup>1</sup> United States Environmental Protection Agency. Control Techniques Guidelines for Alternative Control Techniques Document – NO<sub>x</sub> Emissions from Stationary Reciprocating Internal Combustion Engines. EPA-453/R-93-032. July 1993. Updated September 2000.

Techniques for mitigating CO emissions include:

- Catalytic oxidation, and
- Good combustion practices (e.g., preventative maintenance, change oil and filter every 500 hours of operation, inspect all hoses and belts every 500 hours of operation, minimize idling time).

Although Regulation 2-2 does not include a definition for cost-effectiveness, Section 2-2-414 requires the Air District to publish and periodically update a BACT Workbook and that BACT will be determined using the workbook as a guidance document.

Section 1 of the BACT Workbook includes a maximum cost guideline for NO<sub>x</sub> emissions of \$17,500 per ton of emissions reduced. The BACT Workbook does not have a maximum cost effectiveness value for CO. However, the South Coast Air Quality Management District lists a maximum cost-effectiveness value of \$801 for CO.

Using these maximum cost effectiveness values and assuming that 90 percent of the emissions in Table 1 could be abated, maximum annualized costs for NO<sub>x</sub> controls could not exceed \$675.50 and \$5.70 for CO controls to be deemed cost-effective.

All NO<sub>x</sub> and CO controls are expected to exceed both maximum annualized costs. Therefore, requiring more stringent controls than meeting achieved-in-practice requirements is deemed not cost-effective.

Consequently, S-1 is required to comply with the current achieved-in-practice standards:

S-1	Pollutant	Emission Factor	BACT(2) Standard
	NO <sub>x</sub> *	2.47 g/bhp-hr	2.85 g/bhp-hr

**Basis:** The standard is expressed as non-methane hydrocarbons +NO<sub>x</sub>. NO<sub>x</sub> is estimated to be 95% of the combined standard.

**Offsets**

Offset must be provided for any new or modified source at a facility that will have the potential to emit more than 10 tons per year of NO<sub>x</sub> or POC, as specified in Regulation 2-2-302; 100 tons per year or more of PM<sub>2.5</sub>, PM<sub>10</sub> or sulfur dioxide, as specified in Regulation 2-2- 303.

**Table 3. Potential to Emit for FID 202934**

Pollutant	Existing Annual Emissions (TPY)	Application Annual Emissions* (TPY)	Facility Annual Emissions (TPY) *	Offset Requirement (TPY)	Offset Required
NO <sub>x</sub>	0.000	0.129	0.129	>10	N
POC	0.000	0.004	0.004	>10	N
CO	0.000	0.023	0.023	-	N
PM <sub>10</sub> /PM <sub>2.5</sub> <sup>1</sup>	0.000	0.004	0.004	≥100	N
SO <sub>2</sub>	0.000	0.000	0.000	≥100	N

Basis: Annual emissions: Reliability-related activity of 50 hours and emergency operation of 100 hours for S-1.

Since the facility’s potential to emit is below the offsets trigger levels specified in Regulation 2-2, offsets are not required.

**Statement of Compliance**

The owner/operator is expected to comply with all applicable requirements. Key requirements are listed below:

**Airborne Toxic Control Measure for Stationary Compression Ignition Engines**

ATCM, 5/19/2011, section § 93115, title 17, CA Code of Regulations

S-1 is considered stationary Internal Combustion Engines (ICE) greater than 50 hp, therefore is subject to section 93115. S-1 meets the applicable emission standards for all pollutants for the same model year and maximum horsepower rating as specified in Table 1 (attached as an image below), in effect on the date of submittal, as defined in section 93115.4, and are certified to the new nonroad compression-ignition (CI) engine emission standards for all pollutants as specified in 40 CFR, PART 60, Subpart III-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The engine is limited to operating up to 50 hours per year for maintenance and testing purposes per permit conditions below. However, per section 93115.6(a)(3)(A)2 operation for emergency use and for emission testing to show compliance with 93115.6(a)(3) is not limited.

Image 1: Table 1 from title 17, California Code of Regulations section 93115.

<b>Maximum Engine Power</b>	<b>Model year(s)</b>	<b>PM</b>	<b>NMHC+NOx</b>	<b>CO</b>
50 ≤ HP < 75 (37 ≤ kW < 56)	2007	0.15 (0.20)	5.6 (7.5) 3.5 (4.7)	3.7 (5.0)
	2008+			
75 ≤ HP < 100 (56 ≤ kW < 75)	2007	0.15 (0.20)	5.6 (7.5) 3.5 (4.7)	3.7 (5.0)
	2008+			
100 ≤ HP < 175 (75 ≤ kW < 130)	2007	0.15 (0.20)	3.0 (4.0)	3.7 (5.0)
	2008+			
175 ≤ HP < 300 (130 ≤ kW < 225)	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
	2008+			
300 ≤ HP < 600 (225 ≤ kW < 450)	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
	2008+			
600 ≤ HP < 750 (450 ≤ kW < 560)	2007	0.15 (0.20)	3.0 (4.0)	2.6 (3.5)
	2008+			
HP > 750 (kW > 560)	2007	0.15 (0.20)	4.8 (6.4)	2.6 (3.5)
	2008+			

1. May be subject to additional emission limitations as specified in current applicable district rules, regulations or policies.

**District Rules**

Regulation 2-5-302 (New Source Review of Toxic Air Contaminants) S-1 is a source of Toxic Air Contaminants (TAC) therefore subject to this regulation. A Health Risk Assessment (HRA) was conducted for this project. Since the proposed engine does not trigger TBACT, and the estimated project cancer risk does not exceed 10 in a million and the chronic hazard index does not exceed 1.0, this project complies with the Air District’s regulations.

Regulation 6-1-303 (*Ringelmann No. 2 Limitation*) Except as provided in Sections 6-1-303, 304 and 306, any source of particulate matter must comply with this regulation. The operation of S-1 does not fall under sections 6-1-303, 304 and 306, therefore are subject to 6-1-303.

Regulation 9-1-301 (*Limitations on Ground Level Concentrations of SO<sub>2</sub>*)

S-1 will operate within the State of California, therefore, use Ultra Low Sulfur Diesel (ULSD) which has a sulfur content of 15 ppm. Hence, the project is likely to comply with the requirements of this regulation.

Regulation 9-8 (*NO<sub>x</sub> and CO from Stationary Internal Combustion Engines*)

Section 9-8-110.5 – Limited exemption for emergency standby engines. The requirements of Sections 9-8-301 through 305, 501 and 503 shall not apply to the emergency standby engines. This is applicable to this project since S-1 is an emergency engine that will be used to mitigate imminent fires.

Section 9-8-330 – Hours of operation for emergency standby engines.

Section 330.1 allows unlimited hours of operation for emergency use.

Section 330.3 adds that reliability-related activities are limited to 50 hours in a calendar year, or limitations contained in a District permit, whichever is lower. Permit conditions limit to 34 hours per calendar year maintenance and reliability operation for each engine in this application.

Section 9-8-502 – Recordkeeping Any person who operates any engine subject to Section 9-8-300 shall comply with the recordkeeping requirements. These requirements are established in this section and the permit condition.

### **California Environmental Quality Act (CEQA)**

This project is classified as ministerial under the District Regulation 2-1-311, because the engineering review for this project requires only the application of standard emission factors and established formulas as specified in Permit Handbook Chapter 2.3 Internal Combustion Engines and is therefore not subject to CEQA review. This review follows objective procedures and applies standard permit conditions; and therefore, the review of this project is not discretionary as defined by CEQA. Since this project is ministerial, it is not subject to CEQA review requirement of Regulation 2-1-310, and no further CEQA analysis is required.

### **New Source Performance Standards (NSPS)**

40 CFR 60, Subpart IIII (*Stationary Compression Ignition Internal Combustion Engines*)

S-1 is greater than 50 hp and has a displacement of 30 L or above, therefore is subject to the NSPS requirements.

Section § 60.4202 requires that engines 2011 model year and later, meet the Tier 2 emission standards as described in 40 CFR part 1039, appendix I, Table 2. S-1 meets the tier 3 emission standards. Therefore, comply with the requirements. Additionally, the engine is certified to the new nonroad compression-ignition (CI) engine emission standards for all pollutants as specified in 40 CFR, 60, Subpart IIII.

### **National Emissions Standards for Hazardous Air Pollutants (NESHAP)**

40 CFR 63, Subpart ZZZZ (*Stationary Reciprocating Internal Combustion Engines (RICE)*) establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. S-1 meets the stationary RICE definition in this subpart; however, they are not considered a major source of HAP emissions, therefore are not subject to section § 63.6610. Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The source is certified by EPA, and is expected to be installed, operated, and maintained per the manufacturer's instructions.

### **Prevention of Significant Deterioration (PSD)**

This application is not part of a PSD project as defined in Regulation 2-2.

### **California Health & Safety Code §42301.6 and Regulation 2-1-412 (Public Notice, Schools & Overburdened Communities)**

Prior to approving an application for an authority to construct or permit to operate, a public notice, fully describing the potential emissions, shall be prepared for the following cases:

- (i) A new or modified source located within 1000 feet of the outer boundary of a K-12 school site and which results in the increase in emissions of any substance into the ambient air which has been identified by the California Air Resources Board or the APCO as a toxic air contaminant or a hazardous air contaminant or which is on the list required to be prepared pursuant to subdivision (a) of Section 25532 or Section 44321 subsections(a) to (f) inclusive of the Health and Safety Code.
- (ii) A new or modified source located within an OBC as defined in Section 2-1-243 and for which a Health Risk Assessment is required pursuant to Section 2-5-401

The proposed source will operate less than 1,000 feet from the Synapse School located at 3375 Edison Way, Menlo Park , CA 94025. Furthermore, the project triggered a refined HRA and it is located within an OBC. Therefore is subject to the public notice requirements.

### **Permit Conditions**

#### **Permit Condition #100072 for S-1**

1. The owner or 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]

2. 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]

3. 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).

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

4. 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 or 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, playground, 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]

### **Permit Condition #100073 for S-1**

The owner/operator shall not exceed the following limits per year per engine for reliability-related activities:



- 50 Hours of Diesel fuel (Diesel fuel)  
[Basis: Cumulative Increase; Regulation 2-5; Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

*End of Conditions*

**Recommendation**

The Air District has reviewed the material contained in the permit application for the proposed project and has made the preliminary determination that the project is expected to comply with all applicable requirements of the 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 an Overburdened Community and requires an HRA, which triggers the public notification requirements of Regulation 2-1-412. After the comments are received from the public and reviewed, the Air District will make a final determination on the permit.

I recommend that the Air District initiates a public notice and consider any comments received prior to taking any final action on issuance of an Authority to Construct and/or a Permit to Operate for the following equipment:

**S-1 Emergency Standby Diesel Generator Set  
Make: John Deere, Model: 6068HFG85,  
Year: 2022, 315 bhp, 2.12 MMBtu/hr  
Condition No. 100072 and 100073**

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