

DRAFT Engineering Evaluation
Rivian Automotive, LLC
24570 Clawiter Road, Hayward, California 94545
Plant No. 25211 (Site No. E5211)
Application Nos. 31707 & 31934

Project Description: New Battery Research and Development, Design, and Manufacturing

BACKGROUND

Rivian Automotive, LLC (Rivian) has applied to obtain an Authority to Construct (A/C) and Permit to Operate (P/O) for the following equipment:

S-2 Stationary Emergency Diesel Engine-Generator Set
Make: Caterpillar, Model: C9, Model Year: 2022
480 Horsepower, 3.07 MMBtu/Hour
Permit Condition Nos. 100072, 100073, and 100102

Abated by:

A-1 Diesel Particulate Filter
Make: Johnson Matthey, Model: CRT(+)

S-3 Facility-Wide Wipe Cleaning Operation
7.8 lbs/day of IPA

Rivian Automotive, LLC (Rivian) initially proposed to construct a new facility that would have been used for lithium-ion battery cell research and development, design, and manufacturing.

Rivian submitted two permit applications (Application 31707 and Application 31934) to install and operate equipment for lithium-ion battery cell research and development, design, engineering, and manufacturing.

However, after submittal of Application 31707 and Application 31934, Rivian requested that all sources within Application 31707 be withdrawn and all sources within Application 31934 be withdrawn except for an emergency diesel engine (S-2) and a facility-wide wipe cleaning operation (S-3). Accordingly, Application 31707 will be cancelled and only S-2 and S-3 of Application 31934 will be evaluated.

Stationary Emergency Diesel Engine-Generator Set (S-2)

The regulated air pollutants from this source are nitrogen oxides (NO_x), carbon monoxide (CO), precursor organic compounds (POC), sulfur dioxide (SO₂), particulate matter 10-microns (PM₁₀), particulate matter 2.5-micron (PM_{2.5}), and Toxic Air Contaminants (TACs).

All of these pollutants are briefly discussed on the Air District's web site at www.baaqmd.gov. S-2 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. S-2 will be abated by a Johnson Matthey CRT(+) diesel particulate filter (DPF) approved by CARB

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(CARB Level 3 Verified Technology). It is certified to achieve an 85% reduction in particulate matter emissions.

Facility-Wide Wipe Cleaning Operation (S-3)

Rivian will use isopropanol (IPA) for wipe cleaning of equipment. IPA is both a POC and a TAC. Rivian will be limited to 7.8 pounds of IPA per day and 1.424 tons of IPA per year.

EMISSIONS REVIEW

The emergency engine (S-2) is equipped with a diesel particulate filter (A-1) that is certified to control PM₁₀ and PM_{2.5} by 85%.

Table 1. Cumulative Increase Emissions Emergency Engine (S-2)						
Pollutant	Unabated Emission Factor (g/bhp-hr)	Emission Reduction Percent via DPF	Hourly Emission Rate (lbs./hour)	Daily Emission Rate (lbs./day)	Annual Emission Rate (lbs./year)	Annual Emission Rate (tons/year)
NOx	2.55	0	2.70	64.7	135	0.067
POC	0.20	0	0.21	5.1	11	0.005
CO	2.46	0	2.60	62.4	130	0.065
PM ₁₀ /PM _{2.5}	0.11	85	0.02	0.4	1	0.000
SO ₂	--	0	0.01	0.1	0	0.000

Basis:

- Annual emissions: Reliability-related activity 50 hours for S-20
- Max daily emissions: 24-hour operation
- Emissions from EPA Engine Family NCPXL08.8NZZ for S-20
- ¹ Conservative Assumption: All PM emissions are PM_{2.5}
- ² SO₂ emission factor from AP-42 Table 3.4-1, SO₂ (15 parts per million) = 0.00809*0.0015 pounds SO₂/horsepower-hour

Table 2. Facility-Wide Wipe Cleaning Operation (S-3)					
Pollutant	CAS #	Hourly Emission Rate (lbs./hour)	Daily Emission Rate (lbs./day)	Annual Emission Rate (lbs./year)	Annual Emission Rate (tons/year)
POC	--	7.80	7.8	2,847	1.424
IPA	67-63-0	7.8E+00	--	2.8E+03	--

Rivian will be limited to 7.8 pounds per hour of IPA emissions by Regulation 2-5. To avoid hourly recordkeeping, they will be limited to 7.8 pounds per day to comply with the hourly limit by recording daily usages.

For further information on emission calculations, please reference Appendix A.

TOXIC RISK SCREENING ANALYSIS

A Health Risk Assessment (HRA) was required as this project exceeded chronic and acute trigger levels listed in Regulation 2-5. IPA emissions exceeded the acute trigger level while diesel particulate matter exceeded the chronic trigger levels. As this is a new facility, no prior sources are included in this project. The following tables provide a summary of the project TAC emission rates.

Table 3. Toxic Air Contaminant Acute Project Emissions Review				
Toxic	CAS#	Project Hourly Emission Rate (lbs./hour)	Acute Threshold (lbs./hour)	Exceeds Reg. 2-5 Acute Threshold?
S-2				
Diesel Exhaust Particulate Matter	N/A	1.7E-02	--	--
S-3				
Isopropyl Alcohol	67-63-0	7.8E+00	1.4E+00	Yes

Table 4. Toxic Air Contaminant Chronic Project Emissions Review				
Toxic	CAS#	Project Annual Emission Rate (lbs./year)	Chronic Threshold (lbs./year)	Exceeds Reg. 2-5 Chronic Threshold?
S-2				
Diesel Exhaust Particulate Matter	N/A	8.7E-01	2.6E-01	Yes
S-3				
Isopropyl Alcohol	67-63-0	2.8E+03	2.7E+05	No

Initial results from the HRA indicated that the project cancer risk is 0.47 in a million, the project chronic hazard index (HI) is 0.024, and the project acute HI is 5.1. In accordance with the Air District’s Regulation 2-5-301, Best Available Control Technology for Toxics (TBACT) is not required because each individual source risk does not exceed a cancer risk of 1.0 in a million and/or a chronic HI of 0.20. The estimated project cancer risk does not exceed 6.0 in a million and the project chronic HI does not exceed 1.0. However, the project acute HI exceeds 1.0. The project as initially proposed does not comply with the Air District’s Regulation 2-5-302 project risk requirements. The HRA was conducted to include TAC emissions from a withdrawn source. However, the risk driver for the project was associated with S-3.

To reduce the acute HI to no more than 1.0, the maximum hourly emissions of IPA from S-3 must be limited to no more than 7.8 pounds per hour. To avoid hourly recordkeeping, Rivian accepted a daily IPA limit of 7.8 pounds per day.

The following table is a summary of the risk results.

Table 5. Health Risk Assessment Results			
Receptor	Maximum Cancer Risk	Maximum Chronic Hazard Index	Maximum Acute Hazard Index
Residential	0.47	0.011	--
Off-site worker	0.25	0.024	--
PMI	--	--	1.0

Since the project maximum cancer risk is less than 6.0 in a million and the chronic and acute hazard indices are less than 1.0, the project is acceptable. Since the source cancer risk is less than 1.0 in a million and the chronic hazard index is less than 0.20, TBACT is not required.

BEST AVAILABLE CONTROL TECHNOLOGY

Pursuant to Regulation 2-2-301, Best Available Control Technology (BACT) is required for new or modified sources of BACT pollutants that emit or exceed a maximum daily emission rate of 10 pounds per day. The Stationary Emergency Diesel Engine-Generator Set, S-2, will emit more than 10.0 pounds per day of CO and NOx and will be subject to BACT for these pollutants.

The facility-wide wipe cleaning source (S-3) will not have the potential to emit 10.0 pounds per day or more of any pollutant and is not subject to BACT.

Stationary Emergency Diesel Engine-Generator Set (S-2)

BACT for this source is presented in the current BAAQMD BACT/TBACT Workbook for IC Engine – Compression Ignition: Stationary Emergency, non-Agricultural, non-direct drive fire pump, Document #96.1.3, Revision 8, dated 12/22/2020. For NOx, CO, POC and PM10, BACT(2) is the CARB ATCM standard for the respective pollutant at the applicable horsepower rating. For SO2, BACT(2) is using fuel with sulfur content not to exceed 0.0015%, or 15 ppm. The more restrictive BACT(1) standards are not applicable to this engine because it will be limited to operation as an emergency standby engine.

S-2 satisfies the current BACT(2) standards for the following pollutants which exceed 10 pounds/day below:

Pollutant	Emission Factor	BACT(2) Standard
NOx	2.55 g/bhp-hr	2.85 g/bhp-hr
CO	2.46 g/bhp-hr	2.60 g/bhp-hr

* The standard is expressed as 3.0 g/bhp of NMHC+NOx. NOx is estimated to be 95% of the combined standard (3.0*0.95 = 2.85 g/bhp-hr)

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 NOx. 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,

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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/year or more of PM₁₀, PM_{2.5}, or SO₂.

The following table provides a summary of Rivian’s potential to emit. The potential to emit for the engine includes 100 hours per year for emergencies in addition to the test and maintenance hours.

Table 6. Facility Potential to Emit			
Pollutant	Existing Facility Emissions (tons/year)	New Emissions Increase (tons/year)	New Facility Emissions (tons/year)
POC	0.000	1.439	1.439
NO _x	0.000	0.201	0.201
PM ₁₀	0.000	0.002	0.002
PM _{2.5}	0.000	0.002	0.002
SO ₂	0.000	0.000	0.000
CO	0.000	0.195	0.195

Rivian would not emit more than 10 tons per year of POC or NO_x. Therefore, offsets for POC or NO_x are not required. In addition, Rivian is not a major facility of PM₁₀, PM_{2.5}, or SO₂.

The following table provides a summary of Rivian’s cumulative increase pursuant to Regulation 2-2-208.

Table 7. Facility Cumulative Increase			
Pollutant	Existing Facility Emissions (ton/year)	New Emissions Increase (ton/year)	New Facility Emissions (ton/year)
POC	0.000	1.429	1.429
NO _x	0.000	0.067	0.067
PM ₁₀	0.000	0.000	0.000
PM _{2.5}	0.000	0.000	0.000
SO ₂	0.000	0.000	0.000
CO	0.000	0.065	0.065

STATEMENT OF COMPLIANCE (S-2)

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

Air District Rules

Regulation 6 (Particulate Matter), Rule 1 (General Requirements)

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Per Section 6-1-303.2, internal combustion engines of less than 25 liters (1500 in³) displacement shall not emit 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 or be equal to or greater than 40 percent opacity for more than three minutes in any hour.

Per Section 6-1-305 (Visible Particles), "no person shall emit particles from any operation in sufficient number to cause annoyance to any other person where the particles are large enough to be visible as individual particles at the emission point, or of such size and nature as to be visible individually as incandescent particles.

As shown in Table 1, S-2 has a certified, unabated emission rate of 0.11 g/bhp-hour and an expected abated emission rate of 0.02 g/bhp-hour. At this emission rate, S-2 is not expected to produce visible emissions or fallout in violation of either Section 6-1-303 or Section 6-1-305.

Regulation 9, Rule 1 (Limitations on Ground Level Concentrations of SO₂)

S-2 will be subject to the SO₂ limitations of Regulation 9-1-301 (*Limitation on Ground Level Concentrations of Sulfur Dioxide*), Regulation 9-1-302 (*General Emission Limitation*), and 9-1-304 (*Fuel Burning*).

Per Section 9-1-301, the facility shall not emit SO₂ from any source such that the ground level concentrations of SO₂ that exceeds 0.5 ppm continuously for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours.

Section 9-1-302 requires that a person shall not emit from any source a gas stream containing sulfur dioxide in excess of 300 ppm (dry). Section 9-1-304 states that a person shall not burn any liquid fuel having sulfur content in excess of 0.5% by weight.

Compliance with both Sections 9-1-301, 9-1-302 and 9-1-304 is likely since California law mandates using diesel fuel with a 0.015% by weight sulfur.

Regulation 9, Rule 8 (NO_x and CO from Stationary Internal Combustion Engines)

Regulation 9, Rule 8 limits NO_x and CO emissions from stationary internal combustion engines with an output greater than 50 brake horsepower.

Emergency standby engines are exempted from Sections 9-8-301 through 305, 9-8-501, and 9-8-503 per Section 9-8-110.5 but are subject to Section 9-8-330 (Hours of operation for emergency standby engines), and Section 9-8-502 (Recordkeeping).

Per Section 9-8-330, emergency standby engines may be used for an unlimited number of hours for emergency use but are limited to 50 hours in a calendar year for reliability-related activities.

As required by Section 9-8-530, the facility will be required to keep a monthly log of usage that indicates the total hours of operation, the emergency hours of operation, and the nature of the emergency condition for each emergency.

These requirements will be imposed within permit conditions.

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California Environmental Quality Act

This project includes an emergency standby diesel engine that may operate during testing and maintenance and without restrictions during emergency-use events. It may be employed to prevent or reduce damage to life, health, and property at a facility.

The 2023 California Environmental Quality Act (CEQA) Statue and Guidelines lists classes of projects in Section 15300, which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA.

Section 15301 lists Class 1 projects that involve negligible or no expansion of use. This includes additions to existing structures provided that the addition will not result in an increase of more than 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less, as listed in Section 15301(e)(1). The floor area in this situation is the facility which equates to approximately 12,000 square feet. 50% of this would be 6,000 square feet.

The footprint of the emergency fire pump is not expected to exceed the increase thresholds of 50 percent of the floor area of the existing structure, or 2,500 square feet. As such, this project is exempt from the provisions of CEQA and no further CEQA analysis is required.

Additionally, the applicant has completed Form Appendix H (Environmental Information Form), and it has been reviewed by the Air District, as required for categorical CEQA exemptions.

New Source Performance Standards (NSPS)

The engine is subject to Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart III (*Stationary Compression Ignition Internal Combustion Engines*) because it was manufactured after April 1, 2006, as required by Section 60.4200(a)(2)(i).

The engine has a total displacement of 538 cubic inches, which equates to 8.8 liters, so each cylinder has a volume of less than 10 liters. The engine is a 2022 model year engine and is not a fire pump. 40 CFR 60.4205(b) requires this engine to comply with the emissions standards in Section 60.4202 for all pollutants, for the same model year and maximum engine power. For engines greater than or equal to 300 horsepower and less than 600 horsepower, these standards are:

Non-Methane Hydrocarbon + NO _x :	3.0 g/hp-hour
CO:	2.60 g/hp-hour
PM:	0.15 g/hp-hour

Opacity Limits:

20% opacity during acceleration mode
15% opacity during lugging mode
50% opacity during peaks in acceleration or lugging mode

As shown in Table 1, the engine will comply with these standards.

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40 CFR 60.4206 and 60.4211(a) require that the owner/operator operate and maintain the engine according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine. The owner/operator is expected to comply with this requirement.

Since S-2 has an engine displacement of less than 30 liters per cylinder, S-2 is subject to 40 CFR 60.4207(b). 40 CFR 60.4207(b) requires that the owner/operator must use fuel that complies with 40 CFR 1090.305 for nonroad diesel. 40 CFR 1090.305 requires that owner/operator to use diesel fuel that has a sulfur content of less than or equal to 15 parts per million (ppm) maximum and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

The owner/operator is expected to comply with this requirement because CARB diesel is required to be used in California. California diesel is required to have a maximum sulfur content of no more than 15 ppm by weight. California diesel is required to have a maximum cetane number of 47 and a maximum aromatic content of 10 volume percent or less. Therefore, California diesel would not meet the 40 CFR 1090.305 cetane limit but would meet the aromatic limit.

40 CFR 60.4209(a) requires a non-resettable hour meter. This requirement is already in the standard permit conditions.

40 CFR 60.4209(b) requires that engines with a diesel particulate filter must be installed with a backpressure monitor that notifies the owner / operator when the high backpressure limit of the engine is approached. A permit condition will be imposed that requires this.

The engine will comply with the requirements of 40 CFR 60.4211(c) because the engine will comply with the emission limits of 40 CFR 60.4205(b).

The engine will comply with the requirement in Section 60.4211(f) to run for less than 50 hours per year for maintenance checks and readiness testing, and the prohibition of running for any reason other than emergency operation, maintenance, and testing because they are limited by permit condition to 50 hours per year for reliability testing and otherwise may only operate for emergencies.

40 CFR 60.4214(b) states that owner/operators do not have to submit an initial notification to EPA for emergency engines.

Because the engine has a diesel particulate filter, the owner/operator is subject to 40 CFR 60.4214(c) and must keep records of any corrective action taken after the backpressure monitor has notified the owner / operator that the high backpressure limit of the engine is approached.

The owner/operator is required to comply with certain sections of 40 CFR 60, Subpart A, General Provisions. The owner/operator is expected to comply with this requirement.

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National Emissions Standards for Hazardous Air Pollutants (NESHAP)

40 CFR 63, Subpart ZZZZ (*Stationary Reciprocating Internal Combustion Engines (RICE)*)
Per 40 CFR 63.6585 (“Am I subject to this subpart?”), a stationary RICE is subject to this subpart if it is located at either a major source of hazardous air pollutants (HAPs, 10 tons or more per year of a single HAP or 25 tons or more of a combination of HAPs) or an area source of HAPs.

The facility is not considered a major source of HAPs. Per 40 CFR 63.6675, an area source of HAPs is “any stationary source of HAP that is not a major source as defined in part 63”. Per 40 CFR 63.2, a “stationary source” is “any building, structure, facility, or installation which emits or may emit any air pollutant.”

Therefore, the facility is considered an area source of HAPs and S-2 is subject to 40 CFR 63 Subpart ZZZZ.

Per 40 CFR 63.6590(c)(1), a new stationary RICE located at an area source must meet the requirements of this part by meeting the requirements of 40 CFR Part 60 Subpart IIII for compression ignition engines. No further requirements apply for such engines.

Prevention of Significant Deterioration (PSD)

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

STATEMENT OF COMPLIANCE (S-3)

Regulation 8, Rule 1

Pursuant to Regulation 8-1-320, a person shall not use open containers for the storage or disposal of cloth or paper impregnated with organic compounds that are used for surface preparation, clean-up, or coating, ink, or paint removal. In addition, in accordance with Regulation 8-1-321, a person shall not store spent or fresh organic compounds to be used for surface preparation, clean-up, or coating, ink, or paint removal, in open containers. The requirements of Regulation 8-1 will be included as a permit condition.

Regulation 8, Rule 4

Pursuant to Regulation 8-4-302, a person shall not use solvents or apply surface coatings unless they meet at least one of the three requirements of section 8-4-302. This operation meets section 8-4-302.1 as it will not result in at least 5 tons of VOC emissions during any calendar year.

In addition, according to Regulation 8-4-312.1 any person using organic solvents for surface preparation and cleanup or any person mixing, using or disposing of organic solvent must use closed containers for the storage or disposal of cloth or paper used for solvent surface preparation and cleanup. Pursuant 8-4-312.3 any person using organic solvents for surface preparation and cleanup or any person mixing, using or disposing of organic solvent must use closed containers for solvents and coatings when not in use.

Pursuant Regulation 8-4-501, any person using coatings or solvents subject to this rule shall maintain a current list of coatings and solvents in use that provide all of the data necessary to

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evaluate compliance, such as VOC content and mix ratios of coatings, catalysts and reducers and density and VOC content of solvent; record on an annual basis the quantity of coating applied; record, on a monthly basis, coating usage for coatings subject to subsection 8-4-302.3 and solvents used for surface preparation and clean up; and, retain records for the previous 24 months, which shall be made available for inspection by the Air District.

Regulation 8, Rule 16

According to Regulation 8-16-111, wipe cleaning operations are not subject to the requirements of Regulation 8-16-301 through 8-16-304. In addition, wipe cleaning operations are subject to the requirements of Regulation 8-16-501.3. Regulation 8-16-501.3 requires monthly records showing the type and amount of solvents used, which are subject to Regulation 8-16-111. The recordkeeping requirements of Regulation 8-16 will be included as a permit condition.

California Environmental Quality Act

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 CEQA requirement of Regulation 2-1-310 if the Air 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 Air District's Permit Handbook and BACT/TBACT Workbook.

S-3 was reviewed in accordance with Chapter 6.3 of the Air District's Permit Handbook. The application is considered to be ministerial and is not subject to CEQA review.

STATEMENT OF COMPLIANCE (PROJECT-WIDE)

Public Notification Requirement (Regulation 2-1-412)

Pursuant to Regulation 2-1-412, prior to approving an application for an A/C or P/O for sources that are located within 1,000 feet from the outer boundary of a kindergarten through grade 12 school site or sources located within an overburdened community (OBC) that are subject to the HRA requirement of Regulation 2-5, the Air District shall prepare a public notice as detailed in Regulation 2-1-412.

The facility is not located within 1,000 feet of a kindergarten through grade 12 school. However, the facility is located in an OBC and the project required an HRA. Therefore, this application is subject to the public noticing requirements of Regulation 2-1-412.

PERMIT CONDITIONS

The following applies to S-2.

Permit Condition #100072

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

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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]

End of Condition

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Permit Condition #100073

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

S1 - 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 Condition

Permit Condition #100102

1. The owner/operator shall abate the particulate emissions from the emergency diesel engine by the Diesel Oxidation Catalyst/Particulate Filter at all times the engine is in operation.

[Basis: Toxics, "ATCM for Stationary Compression Ignition Engines" Section 93115.6(a)(3) or 93115.6(b)(3), title 17, CA Code of Regulations]

2. The owner/operator shall comply with requirements for CARB Executive Order DE-08-009-11. [Basis: CARB Executive Order DE-08-009-11, "ATCM for Stationary Compression Ignition Engines" Section 93115.13(f), title 17, CA Code of Regulations, Toxics, Sections 2700 through 2711 of title 13, CA Code of Regulations]

End of Condition

This permit condition is for S-3, wipe cleaning.

Permit Condition #100199

1. The owner/operator of the Wipe Cleaning Operation, S-3, shall not exceed the following usage limits:

75% Isopropanol 1.6 gallons per day; and,
576.7 gallons per consecutive 12-month period.

[Basis: Cumulative Increase and Toxics]

2. The owner/operator may use an alternate solvent(s) other than the materials specified in Part 1 and/or usages in excess of those specified in Part 1, provided that the owner/operator can demonstrate that all of the following are satisfied:

- a. Daily combined NPOC and POC emissions do not exceed 7.8 pounds during any calendar day;
- b. Total combined NPOC and POC emissions from S-3 do not exceed 2,847 pounds in any consecutive twelve-month period;
- c. The use of these materials does not increase toxic emissions above any risk screening trigger level of Table 2-5-1 in Regulation 2-5, with the exception of isopropanol which is allowed to be emitted at a rate of 7.8 pounds per hour and 2,847 pounds in any consecutive twelve-month period.

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[Basis: Cumulative Increase and Toxics]

3. The owner/operator shall use closed containers for the storage or disposal of cloth or paper used for solvent surface preparation and cleanup.
[Basis: Regulations 8-1-321 and 8-4-312]
4. The owner/operator shall close containers of solvents when not in use.
[Basis: Regulations 8-1-321 and 8-4-312]
5. To determine compliance with the above parts, the owner/operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts, including the following information:
 - a. Quantities of each type of solvent used at this source on a daily basis;
 - b. Quantities of each type of solvent used at this source on a monthly basis;
 - c. If a material other than those specified in Part 1 is used, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 2, on a daily and monthly basis; and,
 - d. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve-month period.

[Basis: Regulation 2-1-403]

End of Condition

RECOMMENDATION

The Air 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 Air 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 sources will be located within an Overburdened Community and require 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 initiate a public notice and consider any comments received prior to taking any final action on issuance of Authorities to Construct for the following equipment:

S-2 Emergency Generator Standby Diesel Set
Make: Caterpillar, Model: C9, Model Year: 2022
480 Horsepower, 3.07 MMBtu/hour

Abated by

Rivian Automotive, LLC
Plant No. 25211 (Site No. E2511)
Application Nos. 31707 and 31934

A-1 Diesel Particulate Filter
Make: Johnson Matthey, Model: CRT(+)

S-3 Facility Wide Wipe Cleaning Operation
Isopropanol
Maximum usage 7.8 pounds per day

By: _____
Kevin Creaven
Air Quality Engineer I

Date: _____

DRAFT