Facility Name:	DISC Surgery Center at Carlsbad, LLC
Equipment Type:	34H – Emergency Diesel Engine
Application #:	APCD2024-APP-008388
ID#:	APCD2024-SITE-04616
Equipment/Facility Address:	6250 El Camino Real, Carlsbad, CA 92009
Facility Contact:	Jim Becker, 317-525-1104 jbecker@triasmd.com
Applicant Contact:	Thomas Elliott, (714) 893-7900 Elliott@proehs.com
Permit Engineer:	10/22/2024 X Hawzhin Muhamed Hawzhin Muhamed Assistant APC Engineer Signed by: E089831
Senior Engineer Signature:	11/19/2024 X Joe Herzig Joseph Herzig Senior Air Pollution Control Engineer Signed by: jherzig

1.0 Background

1.1 Type of Application: New installation of a 609 bhp emergency diesel engine driving a 400-kW generator

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

1.3 Facility Description: This is a Medical Center. This facility has no other permits with SDAPCD at other sites. No other applications are open at this site.

1.4 Other Background Info: No hearing board actions, permit denials, legal settlements, open NOV, or nuisance complaints. This site is not a Title V facility.

2.0 Process Description

2.1 Equipment Description.

Emergency Diesel Engine:
Manufacturer: Caterpillar
S/N: TBD
Model: C13
Model Year: 2022
Engine Family: NCPXL12.5NYS
Tier: 3
Horsepower (maximum rated): 609 BHP
Driving a 400-kW emergency-use standby generator.
8-inch diameter, vertical exhaust with Flapper, 8.4 feet above ground.

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.

2.3 Emissions Controls.

This is a Tier 3 certified diesel engine. It is not equipped with any aftermarket controls.

2.4 Attachments.

Generator specification sheets

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
NOx	2.65	3.56	85.33	0.09	177.78
CO	2.01	2.70	64.90	0.07	135.21
NMHC	0.14	0.190	4.57	0.0048	9.51
PM	0.12	0.160	3.85	0.004	8.013
SOx	NA	0.00590	0.14162	0.00015	0.29504

3.2 Estimated Emissions Assumptions.

- Table 1 evaluates the emission unit assuming full load operations, 24 hours per day and total of 50 hours per year.
- Manufacturer-provided emissions were EPA certified emission factors.
- Standard toxics emission factors for diesel engines (see method E15).
- 15 ppmw sulfur fuel
- 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.

Table 3: Prohibitory Rule Discussion				
Applicable Section	**Requirement**	**Engine Complies?**	**Explanation**	**Condition**
Rule 50	Visible Emissions not to exceed 20% opacity or Ringlemann 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
Rule 51	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
Rule 53	Emissions of sulfur compounds calculated as SO2 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
Rule 62	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
Rule 69.4.1				
69.4.1(d)(1)(ii)(E)	Emission standards for NOx and CO emissions. For a new or replacement certified diesel engine, NOx 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	Yes	Use of an EPA certified tier 3 engine (tier 2 for engines with a rated power in excess of 750 bhp) ensures that NOx emissions comply with this requirement.	NA

	50≤bhp<100; 3.7 g/bhp-hr if 100≤bhp<175; 2.6 g/bhp-hr if 175≤bhp<750; 2.6 g/bhp-hr if bhp≥750.			
69.4.1(d)(2)	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
69.4.1(e)(3)	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
69.4.1(f)(2)	The owner or operator must conduct specific maintenance on the engine and control equipment, including oil change/analysis, and checking hoses and belts. Maintenance is required 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
69.4.1(g)(1)	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
69.4.1(g)(2)	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	Yes	Compliance with this provision is expected and this requirement is specified in permit conditions.	C45252

	dates maintenance is performed. Engines within 500 feet of schools must record the time of day when the engine is operated for testing and maintenance. Specific records for internal, external, and partial external power outages is required.			
69.4.1(g)(6)	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 period is needed.	NA
69.4.1(g)(7)	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
69.4.1(g)(9)	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
69.4.1(i)(1)	Requires periodic source testing to confirm compliance with applicable emission standards.	NA	This subsection does not apply to certified emergency engines.	NA

4.2 New Source Review (NSR) Rule 20.1-20.4

This application is subject to District NSR rules. This site is considered a non-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 4: Classification of Major/PSD Source and Modification New Source Review (NSR) Requirements

	NOx	VOC	PM-10	PM-2.5	SOx	CO	Lead
Major Source Threshold (ton/year)	*50*	*50*	*100*	*100*	*100*	*100*	*100*
Major Source? (yes/no)	***No***	***No***	***No***	***No***	***No***	***No***	***No***
Major Modification Threshold (ton/year)	*25*	*25*	*15*	*10*	*40*	*100*	*0.6*
Major Modification at a Major Source?	***No***	***No***	***No***	***No***	***No***	***No***	***No***
Contemporaneous Calculations Performed?	**No**	**No**	**No**	**No**	**No**	**No**	**No**
Federal Major Stationary Source Threshold (ton/year) (Severe non-attainment status)	25	25	100	100	100	100	100
Federal Major Stationary Source?	**No**	**No**	**No**	**No**	**No**	**No**	**No**
Federal Major Modification Threshold (ton/year) (Severe non-attainment status)	*25*	*25*	*15*	*10*	*40*	*100*	*0.6*
Federal Major Modification?	***No***	***No***	***No***	***No***	***No***	***No***	***No***
Contemporaneous Net Calculations Performed	***No***	***No***	***No***	***No***	***No***	***No***	***No***
PSD Threshold (ton/year)	*250*	*250*	*250*	*--*	*250*	*250*	*--*
PSD Modification Threshold (ton/year)	*40*	*40*	*15*	*--*	*40*	*100*	*0.6*
PSD New or Modification?	**No**	**No**	**No**	**No**	**No**		**No**

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. No requirements of this rule apply as shown in the table on the following page.

Table 5: New Source Review Discussion				
Rule/Requirement	**Requirement**	**Applicability**	**Discussion**	**Condition**
Applicability	Rule 20.2 applies to non-major sources	Yes	This is not a major source, so Rule 20.2 applies.	NA
Type of application	New	Yes	NA	NA
Exemptions	No exemptions apply to this equipment	NA	NA	NA
20.2(d)(1) – BACT				
BACT - NOx	Installation of BACT is required if emissions of NOx exceed 10 lbs/day	**Triggered**, see discussion below	The potential to emit for this pollutant is 85.33 lbs/day, which exceed this trigger level, so BACT is required.	NA
BACT - VOC	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 does not exceed this trigger level, so BACT is not required.	NA
BACT - PM-10	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 does not exceed this trigger level, so BACT is not required.	NA
BACT - SOx	Installation of BACT is required if emissions of SOx exceed 10 lbs/day	Not Triggered, no permit limit	The potential to emit for this pollutant does not exceed this trigger level, so BACT is not required.	NA
20.2(d)(2) – AQIA				
AQIA - NOx	Required for project emission increases in excess of 25 lbs/hr, 250 lbs/day or 40 ton/yr of NOx calculated as NO2	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
AQIA - PM-10	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
AQIA - SOx	Required for project emission increases in excess of 25 lbs/hr, 250 lbs/day or 40 ton/yr	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

	of SOx calculated as SO2			
AQIA - CO	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
20.2(d)(3) - PSD	Applicable to source that may have a significant impact on a class I area	NA	This is not a PSD source and emissions are not expected to impact a class I area	NA
20.2(d)(4) - Public Notice	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 is **85.33** *lbs/day based on 24 hours of non-emergency operation, which is greater than the 10 lbs/day threshold for BACT. Alternatives that were considered include natural gas and propane engines, Tier 4F engines including SCR and DPF, and installing an add-on DOC to control VOC. Gas-fueled engines are not feasible as backup power for operations that must occur if natural gas lines are damaged in the event of an emergency like an earthquake. An engine of this size would also likely require SCR for NOx emissions control and DOC for VOC emissions control, methods which are not cost effective as described below. The cost-effectiveness evaluation did not take into account the likely short periods of operation of this engine for maintenance. In many maintenance situations, the engine is operated at low loads and for approximately 30 minutes, some of which the SCR catalyst has not reached appropriate temperature for effectively controlling emissions.*

NOx Analysis:

A tier 4 engine is the lowest emitting BACT option. Cost-effectiveness has previously been evaluated under applications APCD2021-APP-006831, and APCD2021-APP-006981, comparing incremental costs of a tier 2 vs. 4 engine, the results of which are summarized below. Note that this analysis is conservative and does not take into account the likely short periods of operation of this engine for maintenance as noted above which would lower the level of emission reductions achieved.

Project	*Engine Size (bhp)*	*Capital Cost Tier 2*	*Capital Cost Tier 4*	*Annual Cost Tier 2*	*Annual Cost Tier 4*	*Annual Incremental Cost*	*Annual Emission Reduction (lb/yr)*	***Cost Effectiveness***
6831	*2346*	*$329,050*	*$603,826*	*$127,026*	*$200,228*	*$73,202*	*1,112*	***$65.82***
6981	*2937*	*$810,000*	*$1,200,000*	*$131,824*	*$195,294*	*$63,471*	*1,322*	***$48.03***

This analysis shows that a Tier 4F engine, the lowest-emitting category of diesel engines, is not cost-effective. The analysis is based on the assumption that the engine allowed to run up to 50 hours per year for maintenance and testing, the maximum NOx emissions were calculated using the emission standards for a tier 2 and tier 4 engine. Capital costs were provided by the permit applicants which were annualized and added to expected maintenance and operating costs to determine an overall annual cost. While the previous analysis was conducted for larger engines, it is still representative for this application too because the equipment is very similar aside from engine size, and NOx emissions and costs are expected to scale roughly linearly with engine size. Additionally, the cost for an add-on SCR to a tier 2 engine is expected to have a similar cost to the incremental cost of a tier 4 engine, so this analysis also demonstrates that use of an SCR would not be cost effective, in addition to being technologically infeasible because it would not function during most periods of testing and maintenance.

A tier 3 certified engine is the next lowest emitting option and therefore satisfies BACT requirements for NOx.

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 6a: Rule 1200 Applicable Requirements and Discussion

Question	Answer	Discussion
Does the application result in an increase in toxic emissions?	Yes	The application does result in an increase in toxic emissions of specific trace heavy metals and organics (as shown in emission calculations section). See HRA for detail.
Do any special exemptions apply to this equipment?	No	No exemptions apply to this equipment
Are there any other applications that are part of the project?	No	NA
What type of HRA was used?	De Minimis	Engine passed de minimis evaluation. See calculations sheet.
Is the Project Equipped with T-BACT?	No	The engine is not equipped with a DPF which is typically considered T-BACT for the equipment type.
Cancer Risk increase (per one million)	0.86	Meets standard of one.
Chronic HHI	0.54	Meets standard of one.
Acute HHI	0.07	Meets standard of one.
Passes Rule 1200?	Yes	Maintenance and testing (non-emergency operation) must be limited by permit conditions to 50 hours per calendar year.

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 (Aspirations School of Learning,), 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 in regards to 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.

Table 7a: State and Federal Requirement Discussion – Stationary ATCM				
Applicable Section	**Requirement**	**Engine Complies/Expected to Comply?**	**Explanation**	**Condition**
Stationary ATCM				
93115.3	There are no exemptions that apply to this engine	NA	This engine is not one of the engines exempted from any applicable requirements	NA
93115.4	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
93115.5	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
93115.6(a)(1)	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. This rule does not apply if the engine emits no more than 0.01g/bhp-hr of diesel PM.	Yes	Permit conditions specify this requirement.	C28415
93115.6(a)(2)	Allows for engine to be started 30 minutes prior to rotating outage	Yes	Permit conditions specify this requirement.	C28560
93115.6(a)(3)(A)(1)(b)	Requires that all engines used for emergency purposes be certified to at least tier 3 standards (tier 2	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	NA

	for engines with a rated power in excess of 750 bhp) and have Disel PM emissions less than 0.15 g/bhp-hr		below this level satisfies this requirement.	
93115.6(a)(3)(A)(1)(c)	Restricts maintenance and testing operation to no more than 50 hours per calendar year	Yes	Permit conditions specify this requirement.	C28643
93115.6(c)	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
93115.10(a)-(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
93115.10(d)	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.	C28419
93115.10(f)	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	C45252
93115.10(f)	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

93115.10(f)	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
93115.13(a)	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 plus DPF emission reduction guarantee were used to determine compliance and for emission calculations	NA
93115.13(f)	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)	Yes	Engine is not equipped with a DPF.	NA

Table 7b: State and Federal Requirement Discussion

Applicable Section	Requirement	Engine Complies/Expected to Comply?	Explanation	Condition
NESHAP ZZZZ				
40 CFR 63.6590(b)-(c)	Requires that new emergency engines comply with the NESHAP by complying with the applicable NSPS	Yes	See NSPS section below.	NA
NSPS IIII				
40 CFR 60.4205	Requires that engines meet emission limits equivalent to tier 3 levels (tier 2 for engines 750 bhp or higher)	Yes	Use of an EPA certified tier 3 engine (tier 2 for engines with a rated power in excess of 750 bhp) satisfies this requirement.	NA
40 CFR 60.4207	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	C28412

			weight), which will ensure compliance with this requirement.	
40 CFR 60.4209	Requires installation of a non-resettable hour meter	Yes	Permit conditions require the installation and use of a non-resettable hour meter.	C28419
40 CFR 60.4211(a)	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
40 CFR 60.4211(c)	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).	NA
40 CFR 60.4211(e)	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, C40907, C28643
40 CFR 60.4214(b)	Requires records of operation to show that engine is operated as an emergency engine	Yes	Compliance is expected and specified in permit conditions.	C45252
40 CFR 60.4214(c)	For engines with DPFs, requires records of corrective actions taken when the high backpressure limit is approached	NA	Engine is not equipped with a DPF.	NA
40 CFR 60.7(f)	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

4.6 Title V.

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

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

Standard BEC APCD2020-CON-001647 is recommended with 50 hour/year limit for non-emergency/maintenance and testing use.