Facility Name:	Netly	Fiber	Holdin	gs
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Equipment Type: [34H] California Certified Emergency Engine

Application #: APCD2024-APP-008188

ID#: APCD2024-SITE-04517

Equipment/Facility Address: 740 Lomas Santa Fe Dr.

Solana Beach, CA 92075

Facility Contact: Nick Cerini (Facility Contact)

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Revoked certificate



 X Austin Stein

Austin Stein

Jr. Air Pollution Control Engineer

Permit Engineer: Signed by: AustinC.Stein@sdcounty.ca.gov

X

Nicholas Horres

Senior Air Pollution Control Engineer

Senior Engineer Signature:

1.0 Background

- **1.1 Type of Application:** "Existing", unpermitted emergency engine, initial application. For this evaluation, considered a new engine as it was not permitted previously.
- **1.2 Permit History:** This is the initial application for this engine. It is existing, unpermitted. Netly Fiber Holdings acquired the property from another business and with the property they also acquired this installed emergency engine that was not permitted by the SDAPCD.
- **1.3 Facility Description:** This is an office space/business park. This facility does not have any active permits with APCD. No other applications are open at this site.
- **1.4 Other Background Info:** There are no hearing board actions, permit denials, legal settlements, NOV, or nuisance complaints. The site is not a Title V facility.

2.0 Process Description

2.1 Equipment Description.

Emergency Diesel Engine Generator

Manufacturer: FPT Industrial;

Model: F4GE9685A*J;

S/N: 01740136;

Horsepower (maximum rated): 198 BHP;

Model Year: 2019;

EPA Certification Tier: 3;

Engine Family (EPA): KFPXL06.7DGB;

Driving a 100-kW emergency-use standby generator;

5-inch diameter vertical exhaust with flapper raincap, exhausting 8.8 ft. above ground.

Non-Emergency/Maintenance and Testing Limits: 30 hrs./year

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 for the Netly Fiber Holdings operation.

2.3 Emissions Controls.

This is a Tier 3 certified diesel engine. It is not equipped with any add-on controls.

2.4 Attachments.

Generator specification sheet.

3.0 Emissions

3.1 Emissions estimate summary. Estimated emissions from the process are shown below.

Table 1: Estimated PTE for criteria pollutants

	Emission Factor	Hourly Emissions	Daily Emissions	Annual Emissions	
Compound	g/bhp-hr	lbs/hr	lbs/day	tons/year	lbs/yr
NOx	2.70	1.18	28.29	0.018	35.36
CO	0.67	0.29	7.03	0.004	8.79
NMHC	0.12	0.05	1.25	0.001	1.56
PM	0.12	0.05	1.25	0.001	1.56
SOx	NA	0.00212	0.0510	0.00003	0.064

3.2 Estimated Emissions Assumptions

- Table 1 evaluates the emission unit at 30 hours per day and a total of 30 hours per year, assuming full load operations
- Estimated emissions are calculated for maintenance and testing operations. Emergency use is not counted towards operation limits.
- 15 ppmw sulfur fuel
- Emission factors were EPA certified emission factors; Standard toxics emission factors for diesel engines.

- 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 2: Prohibitory Rule Discussion						
Applicable Section	Requirement	Engine Complies?	Explanation	Condition			
	Visible Emissions not to exceed	•	Compliance with this requirement is achieved				
	20% opacity or Ringelmann 1 for		through the use of an EPA certified engine,				
	more than 3 minutes in a 60		and permit conditions will specify this				
Rule 50	minute period	Yes	requirement.	C28413			
			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				
	Cannot cause or contribute to a		will prohibit this engine from causing a public				
Rule 51	public nuisance	Yes	nuisance.	C28414			
	Emissions of sulfur compounds						
	calculated as SO2 on a dry basis		Permit conditions will require use of CARB				
	shall not exceed 0.05 % by volume		diesel fuel (15 ppm Sulfur by weight), which				
Rule 53	on a dry basis.	Yes	will ensure compliance with this requirement.	C28412			
			Permit conditions will require use of CARB				
	Sulfur content of liquid fuel shall		diesel fuel (15 ppm Sulfur by weight), which				
Rule 62	not exceed 0.5 % sulfur by weight.	Yes	will ensure compliance with this requirement.	C28412			
Rule 69.4.1							
	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\leq bhp<100; 3.0 g/bhp-hr if						
	100≤bhp<175; 3.0 g/bhp-hr if						
	175\leq bhp < 750; 4.8 g/bhp-hr if		Use of an EPA certified tier 3 engine (tier 2 for				
	bhp≥750. For a new or		engines with a rated power in excess of 750				
	replacement certified diesel		bhp) ensures that NOx and CO emissions				
	engine, CO emissions shall not		comply with this requirement. This engine is a				
	exceed: 3.7 g/bhp-hr if		tier 3, therefore it complies with this				
69.4.1(d)(1)(ii)(E)	50\leq bhp<100; 3.7 g/bhp-hr if	Yes	requirement.	NA			

	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 periodic maintenance on the engine, 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
\Q\\ /	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 dates maintenance is performed.			
69.4.1(g)(2)	Engines within 500 feet of schools must record the time of day when	Yes	Compliance with this provision is expected and this requirement is specified in permit conditions.	C45252

	the engine is operated for testing and maintenance. Specific records for internal, external, and partial			
	external power outages is required.			
	Requires records of the dates and times when fuel is being combusted and cumulative operating time if claiming a		The applicant has not claimed a	
69.4.1(g)(6)	commissioning exemption.	NA	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
	Requires periodic source testing to confirm compliance with applicable emission standards.		This subsection does not apply to certified	NA
69.4.1(i)(1)	applicable chilission standards.	NA	emergency engines.	INA

4.2 New Source Review (NSR) Rule 20.1-20.4

This application is subject to District NSR rules. At the time of filing, this facility is not considered a 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 3: 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
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
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	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. Requirements of this rule apply; as shown in the table on the following page and sections 20.2(d)(1-2).

Table 4: New Source Review Discussion							
Rule/Requirement	Requirement	Applicability	Discussion	Condition			
•	Rule 20.2 applies to	•	This is a non-major				
	non-major		stationary source, so Rule				
Applicability	stationary sources	Yes	20.2 applies.	NA			
Type of	New/Existing						
application	Unpermitted	Yes	NA	NA			
	No exemptions						
	apply to this						
Exemptions	equipment	NA	NA	NA			
20.2(d)(1) – BACT							
			The potential to emit for				
	Installation of	Triggered,	this pollutant is 29				
	BACT is required if	see	lbs/day, which does				
	emissions of NOx	discussion	exceed this trigger level,				
BACT - NOx	exceed 10 lbs/day	below.	so BACT is required.	NA			
			The potential to emit for				
	Installation of		this pollutant is 1.3				
	BACT is required if	Not	lbs/day, which does not				
	emissions of VOC	triggered, no	exceed this trigger level,				
BACT - VOC	exceed 10 lbs/day	permit limit	so BACT is not required.	NA			
		1	The potential to emit for				
	Installation of		this pollutant is 1.3				
	BACT is required if	Not	lbs/day, which does not				
	emissions of PM-10	triggered, no	exceed this trigger level,				
BACT - PM-10	exceed 10 lbs/day	permit limit	so BACT is not required.	NA			
Dite 1 111 10	eneced to less day	perime rimit	The potential to emit for	1111			
	Installation of		this pollutant is 0.05				
	BACT is required if	Not	lbs/day, which does not				
	emissions of SOx	triggered, no	exceed this trigger level,				
BACT - SOx	exceed 10 lbs/day	permit limit	so BACT is not required.	NA			
	eneced to lost day	рениненине	so Brief is not required.	1171			
20.2(d)(2) – AQIA	Paguired for						
	Required for project emission		The increase in emissions				
	increases in excess		of this air contaminant				
	of 25 lbs/hr, 250		from this project does not				
	lbs/day or 40 ton/yr		exceed any of these				
	of NOx calculated		levels, so no AQIA is				
AQIA - NOx	as NO2	Not Triggered	required.	NA			
			The increase in emissions				
	Required for		of this air contaminant				
	project emission		from this project does not				
	increases in excess		exceed any of these				
	of 100 lbs/day or 15		levels, so no AQIA is				
AQIA - PM-10	ton/yr of PM-10	Not Triggered	required.	NA			
	Required for		The increase in emissions				
	project emission		of this air contaminant				
AQIA - SOx	increases in excess	Not Triggered	from this project does not	NA			

	of 25 lbs/hr, 250		exceed any of these	
	lbs/day or 40 ton/yr		levels, so no AQIA is	
	of SOx calculated		required.	
	as SO2			
	Required for		The increase in emissions	
	project emission		of this air contaminant	
	increases in excess		from this project does not	
	of 100 lbs/hr, 550		exceed any of these	
	lbs/day or 1000		levels, so no AQIA is	
AQIA - CO	ton/yr of CO	Not Triggered	required.	NA
	Applicable to			
	source that may			
	have a significant		Emissions from this	
	impact on a class I		engine do not trigger PSD	
20.2(d)(3) - PSD	area	NA	requirements.	NA
	Requires 30 day			
	public notice if an			
	AQIA was required			
	or if increase in		AQIA was not required	
	VOC emissions		and VOC emission	
	from the project		increase from this project	
20.2(d)(4) - Public	exceed 250 lbs/day		does not exceed these	
Notice	or 40 ton/year	NA	levels.	NA

20.2(d)(1) - BACT

The PTE for NOx for the engine is 29 lbs./day, greater than the 10 lbs./day threshold for BACT. Therefore, a BACT analysis is required.

Alternatives that were considered include natural gas and propane engines and Tier 4f engines including SCR and DPF. 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 emissions control, a method which is 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.

							Annual	
	Engine	Capital		Annual	Annual	Annual	Emission	
	Size	Cost Tier	Capital	Cost	Cost	Incremental	Reduction	Cost
Project	(bhp)	2	Cost Tier 4	Tier 2	Tier 4	Cost	(lb/yr)	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.

The 198 BHP tier 3 engine proposed under this application would similarly not be cost effective. This is because a tier 3 engine does not have significantly different design than a tier 2 engine, has lower pre-secondary control emissions, and since costs would be expected to scale roughly linearly based on engine power for a smaller engine, any discrepancy would not be sufficient to alter the conclusion that a tier 4 final engine is not cost effective, especially considering that the 90% emission reduction achieved by SCR/Tier 4f engine would not likely be achieved during most testing and maintenance operations. This makes sense as a tier 3 engine has lower NOx emissions than a tier 2 engine, yet requires a similar level of add-on control costs to achieve tier 4 emission levels. For all these reasons, this demonstrates that a tier 4 engine or similar add-on controls including an SCR would not be cost effective.

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 5: Rule 1200 Applicable Requirements and Discussion

Question	Answer	Discussion
Does the application result in an increase in toxic emissions?	Yes	The application results in an increase in toxic emissions of Diesel Particulate Matter or specific trace heavy metals and organics (as shown in emission calculations section).
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?	Refined	Engine did not pass de minimis and was sent for a refined HRA. See results attached.
Is the Project Equipped with T-BACT?	No	N/A
Cancer Risk increase (per one million)	≤1	Project meets standard of one in one million at 30 hrs/yr limit of maintenance and testing operation
Chronic HHI	4.40E-04≤1	Meets standard of one.
Acute HHI	0.155≤1	Meets standard of one.
Passes Rule 1200?	Yes	Maintenance and testing (non-emergency operation) must be limited by permit conditions to 30 hours per calendar year

The refined HRA showed that the project did NOT pass rule 1200 for residential cancer risk when operating at 50 hrs/year. Therefore, it was reduced to 30 hrs/year for maintenance and testing to meet the residential cancer risk standard of 1 in one million or less.

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 a school (Skyline Elementary), 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 regarding 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 6a: State and Federal Requirement Discussion (Stationary ATCM)						
Applicable Section	Requirement	Engine Complies/Expect ed 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	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 for engines with a rated power in excess of 750 bhp) and have Diesel PM emissions less than 0.15 g/bhp-hr	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 below this level satisfies this requirement. This is a tier 3 engine, therefore complies.	NA		

			Permit conditions and equipment	
	Restricts maintenance and testing		description specify yearly maintenance	
	operation to no more than 50		and testing operations equal to or less	
93115.6(a)(3)(A)(1)(c)	hours per calendar year	Yes	than 50 hours per calendar year.	C44986
	Does not allow emergency			
	standby engines to operate as part			
	of "demand response programs"			
	unless additional requirements are		Permit conditions specify this	
93115.6(c)	met	Yes	requirement.	C40907
	Requires that specified		The submitted application contained all	
	information is submitted to the		of the required contact/location	
	District as part of application		information, engine data, and emission	
93115.10(a)-(b)	package	Yes	information	NA
	Requires installation of a non-			
	resettable hour meter and for			
	engines with DPFs, a			
	backpressure monitor that alerts			
	the operator when the		Permit conditions require the	
	backpressure limit of the engine		installation and use of a non-resettable	
93115.10(d)	is approached	Yes	hour meter.	C28419
	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		Permit conditions require that these	
	testing, other, demand response)		records be kept and the summary	
93115.10(f)	of each period of operation	Yes	updated monthly	C45252
			Permit conditions require that	
			documentation of the CARB diesel	
	Requires records of CARB diesel		certification for all fuel used be	
93115.10(f)	fuel certification	Yes	maintained	C43434
	States that records must be kept			
	on-site for at least 24 months and		Compliance with this provision is	
	off-site for an additional 12		expected and this requirement is	
93115.10(f)	months (total 36 months)	Yes	specified in permit conditions.	C43432

	Allows the use of certification		The manufacturer's engine rating	
	data or other emission test data to		specific emission data was used to	
	demonstrate compliance with		determine compliance and for emission	
93115.13(a)	emission limits	Yes	calculations	NA
	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			
93115.13(f)	means as listed)	NA	Not equipped with a DPF	NA

Table 6a: State and Federal Requirement Discussion (Stationary ATCM)										
Applicable Section	Requirement	Engine Complies/Expected to Comply?	Explanation	Condition						
NESHAP ZZZZ										
	Requires that new emergency engines comply with the NESHAP by complying with									
40 CFR 63.6590(b)-(c)	the applicable NSPS	Yes	See NSPS section below.	NA						
NSPS IIII										
	Requires that engines meet emission limits equivalent to		Use of an EPA certified tier 3 engine (tier 2 for engines with a rated power in excess of 750 bhp) with PM emission below this level satisfies this							
40 CFR 60.4205	tier 3 levels (tier 2 for engines 750 bhp or higher)	Yes	requirement. This is a tier 3 engine, therefore complies.	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 weight), which will ensure compliance with this requirement.	C28412						

			Permit conditions require the	
	Requires installation of a non-		installation and use of a non-resettable	
40 CFR 60.4209	resettable hour meter	Yes	hour meter.	C28419
	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		Permit conditions specify this	
40 CFR 60.4211(a)	by manufacturer	Yes	requirement.	C43433
			Use of an EPA certified tier 3 engine	
			(tier 2 for engines with a rated power in	
			excess of 750 bhp) with PM emission	
	Requires that the engine be		below this level satisfies this	
	certified under EPA		requirement. This is a tier 3 engine,	
40 CFR 60.4211(c)	regulations	Yes	therefore complies.	NA
` ,			Compliance ensured by permit	
			conditions for ATCM limiting operation	
			for maintenance and testing to no more	
			than 30 hours per calendar year and	
			restricting non-emergency operation for	
	Restricts operation of		only those uses allowed by the permit	C40239,
	emergency engines for non-		(maintenance and testing). ATCM	C40907,
40 CFR 60.4211(e)	emergency purposes	Yes	requirements more stringent than NSPS.	C44986
	Requires records of operation			
	to show that engine is operated		Compliance is expected and specified in	
40 CFR 60.4214(b)	as an emergency engine	Yes	permit conditions.	C45252
	For engines with DPFs,			
	requires records of corrective			
	actions taken when the high			
	backpressure limit is			
40 CFR 60.4214(c)	approached	NA	Engine is not equipped with a DPF.	NA
			Compliance with this provision is	
	Requires that all records be		expected and this requirement is	
40 CFR 60.7(f)	maintained for at least 2 years	Yes	specified in permit conditions.	C43432

ENGINEERING EVALUATION ATTACHMENTS

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

Conditions APCD2020-CON-001704 with a 30 hour/year limit for non-emergency/maintenance and testing.

All relevant attachments are uploaded to BCMS under the corresponding application number.

Rule 1200 Health Risk Assessment

Facility Name: Netly Fiber Holdings
Facility ID: APCD2024-SITE-04517
Application: APCD2024-APP-008188

Project Engineer: Austin Stein Modeler: Bill Reeve

Toxics Risk Analyst: Peter Ossowski

Date Submitted to Toxics: 7/02/2024 Date Completed by Toxics: 7/24/2024

HRA Tools Used: Lakes-AERMOD (Version 23132)/HARP (v22118)

The following estimated risks are valid only for the input data provided by the Project Engineer.

Estimated worker risk does not exceed the residential risk. Therefore, only residential risk is presented in the following results.

Estimated Risk Levels:

Maximum Individual Cancer Risk (Resident) 1.64 in one million

Chronic Noncancer Health Hazard Index (Resident) = 4.40E-04 Acute Health Hazard Index (*PMI) = 0.155

The proposed application is for a stationary diesel emergency engine. The ARB Air Toxics Control Measure (ATCM) limits non-emergency operations to 50 hours per year.

The estimated cancer risk for the application exceeds Rule 1200 limits of 1 in one million (not equipped with T-BACT) at 50 hours, therefore the project is within Rule 1200 thresholds contingent on Routine Maintenance and Testing limited to 30 hours a year.

^{*}Point of Maximum Impact

Netly Fiber Holdings

page 2 of 3 7/24/2024

Application Number 008188

Input Data Provided by Project Engineer:

Type of Source: Diesel IC Engine.

Controls Description: None.

Worst-Case TAC Emissions Increase:

	Hourly Emission Rate	Annual Emission Rate
Toxic Air Contaminant	(lb/hr)	(lb/yr)
DIESEL PARTICULATE	N/A	2.60E+00
ACETALDEHYDE	7.86E-03	3.93E-01
ACROLEIN*	3.40E-04	1.70E-02
ARSENIC COMPOUNDS	1.61E-05	8.03E-04
BENZENE	1.87E-03	9.35E-02
BUTADIENE, 1,3-	2.18E-03	1.09E-01
CADMIUM AND COMPOUNDS	1.51E-05	7.53E-04
CHLOROBENZENE	2.01E-06	1.00E-04
CHROMIUM (HEXAVALENT)	1.00E-06	5.02E-05
COPPER AND COMPOUNDS	4.12E-05	2.06E-03
ETHYL BENZENE	1.09E-04	5.47E-03
FORMALDEHYDE	1.73E-02	8.67E-01
HEXANE-N	2.70E-04	1.35E-02
HYDROCHLORIC ACID	1.87E-03	9.35E-02
LEAD & COMPOUNDS	8.33E-05	4.17E-03
MANGANESE AND COMPOUNDS	3.11E-05	1.56E-03
MERCURY AND COMPOUNDS (INORGANIC)	2.01E-05	1.00E-03
NAPHTHALENE	1.98E-04	9.89E-03
NICKEL AND NICKEL COMPOUNDS	3.92E-05	1.96E-03
POLYCYCLIC AROM. HC (PAH) [Treat as B(a)P for HRA]	3.63E-04	1.82E-02
PROPYLENE	4.69E-03	2.34E-01
SELENIUM AND COMPOUNDS	2.21E-05	1.10E-03
TOLUENE	1.06E-03	5.29E-02
XYLENES	4.26E-04	2.13E-02

Source: Acute TACs – Ventura County, 5/17/01.

Diesel particulate exhaust is a surrogate for all toxic air contaminant annual emissions from diesel-fueled engines when determining the potential cancer risk and noncancer chronic hazard index. Speciated toxic air contaminant hourly emissions are used when determining the potential noncancer acute hazard index.

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Process Data:

Operation Parameter	Value
Diesel particulate emission factor (g/hp-hr)	0.12
Engine horsepower (bhp)	198
Fuel Consumption (gal/hr)	10.04
Annual hours of operation	50

Release Parameters:

Exhaust Flow Rate, cfm:	885
Exhaust Temperature, °F:	885
Stack Height above ground, ft:	8.8
Stack Diameter, ft:	0.4

Discussion

The HRA was conducted in accordance with EPA and OEHHA guidance and District standard procedures. A point source was modeled with refined air dispersion modeling using EPA's AERMOD model, AERMET (Version 22112) processed Del Mar 2010/2012 sigma theta meteorology data, AERMAP terrain processing, and urban dispersion coefficients. Building downwash effects were calculated using the EPA BPIP-Prime model. The receptor grid was sufficiently dense to identify maximum impacts.

Since there is a school within a 1 in one million residential cancer risk isopleth, a fraction of time (FAH) was not applied to ages less than 16 years.

These risk results are based on the risk scenario calculations and health data at the time of the review, and should not be scaled with revised emissions rates without consulting with the Toxics Section.

HARP2 - HRACalc (dated 22118) 7/24/2024 11:38:31 AM - Output Log

RISK SCENARIO SETTINGS

Receptor Type: Resident

Scenario: All

Calculation Method: Derived

EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: -0.25

Total Exposure Duration: 30

Exposure Duration Bin Distribution

3rd Trimester Bin: 0.25

0<2 Years Bin: 2 2<9 Years Bin: 0 2<16 Years Bin: 14 16<30 Years Bin: 14 16 to 70 Years Bin: 0

PATHWAYS ENABLED

NOTE: Inhalation is always enabled and used for all assessments. The remaining pathways are only used for cancer and noncancer chronic assessments.

Inhalation: True Soil: True Dermal: True Mother's milk: True

Water: False

Fish: False

Homegrown crops: False

Beef: False Dairy: False Pig: False Chicken: False Egg: False

INHALATION

Daily breathing rate: RMP

Worker Adjustment Factors

Worker adjustment factors enabled: NO

Fraction at time at home

3rd Trimester to 16 years: OFF 16 years to 70 years: ON

Deposition rate (m/s): 0.02 Soil mixing depth (m): 0.01 Dermal climate: Warm

TIER 2 SETTINGS Tier2 not used.

Calculating cancer risk

Cancer risk saved to: C:\Users\possowsk\Desktop\8188_Netly Fiber Holdings\risk\nofahCancerRisk.csv

Calculating chronic risk

Chronic risk saved to: C:\Users\possowsk\Desktop\8188_Netly Fiber Holdings\risk\nofahNCChronicRisk.csv

Calculating acute risk

Acute risk saved to: C:\Users\possowsk\Desktop\8188_Netly Fiber Holdings\risk\nofahNCAcuteRisk.csv

HRA ran successfully

 $*HARP-HRACalc\ v22118\ 7/24/2024\ 11:38:31\ AM-Cancer\ Risk-Input\ File:\ C:\ Users\ possowsk\ Desktop\ 8188_Netly\ Fiber\ Holdings\ risk\ nofah\ HRAInput.hra$

INDEX GRP1 GRP2 POLID POLABBREV CONC RISK_SUM SCENARIO

1 Engine 9901 DieselExhPM 0.0022 1.64E-06 30YrCancerRMP_InhSoilDermMMilk_FAH16to70

1.64E+00

Hours for <1 Risk = 30

*HARP - HRACalc v22118 7/24/2024 11:38:31 AM - Chronic Risk - Input File: C:\Users\possowsk\Desktop\8188_Netly Fiber Holdings\risk\nofahHRAInput.hra

INDEX GRP1 GRP2 POLID POLABBREV CONC RESP SCENARIO

1 Engine 9901 DieselExhPM 0.0022 4.40E-04 NonCancerChronicDerived_InhSoilDermMMilk

*HARP - HRACalc v22118 7/24/2024 11:38:31 AM - Acute Risk - Input File: C:\Users\possowsk\Desktop\8188_Netly Fiber Holdings\risk\nofahHRAInput.hra

INDEX	GRP1	GRP2	POLID	POLABBREV	CONC	EYE	SCENARIO
	1 Engine		9901	DieselExhPM	0	0.00E+00	NonCancerAcute
:	2 Engine		75070	Acetaldehyde	2.6	5.53E-03	NonCancerAcute
;	3 Engine		107028	Acrolein	0.113	4.52E-02	NonCancerAcute
	4 Engine		7440382	Arsenic	0.00531	0.00E+00	NonCancerAcute
	5 Engine		71432	Benzene	0.619	0.00E+00	NonCancerAcute
(6 Engine		106990	1,3-Butadiene	0.721	0.00E+00	NonCancerAcute
•	7 Engine		7440439	Cadmium	0.00498	0.00E+00	NonCancerAcute
	B Engine		108907	Chlorobenzn	0.000664	0.00E+00	NonCancerAcute
!	9 Engine		18540299	Cr(VI)	0.000332	0.00E+00	NonCancerAcute
1) Engine		7440508	Copper	0.0136	0.00E+00	NonCancerAcute
1	1 Engine		100414	Ethyl Benzene	0.0362	0.00E+00	NonCancerAcute
1:	2 Engine		50000	Formaldehyde	5.73	1.04E-01	NonCancerAcute
13	3 Engine		110543	Hexane	0.0893	0.00E+00	NonCancerAcute
1	4 Engine		7647010	HCl	0.619	2.95E-04	NonCancerAcute
1	5 Engine		7439921	Lead	0.0276	0.00E+00	NonCancerAcute
1	6 Engine		7439965	Manganese	0.0103	0.00E+00	NonCancerAcute
1	7 Engine		7439976	Mercury	0.00664	0.00E+00	NonCancerAcute
1	B Engine		91203	Naphthalene	0.0654	0.00E+00	NonCancerAcute
19	9 Engine		7440020	Nickel	0.013	0.00E+00	NonCancerAcute
2) Engine		1151	PAHs-w/o	0.12	0.00E+00	NonCancerAcute
2	1 Engine		115071	Propylene	1.55	0.00E+00	NonCancerAcute
2:	2 Engine		7782492	Selenium	0.00731	0.00E+00	NonCancerAcute
2	3 Engine		108883	Toluene	0.35	7.00E-05	NonCancerAcute
2	4 Engine		1330207	Xylenes	0.141	6.41E-06	NonCancerAcute
						1.55E-01	

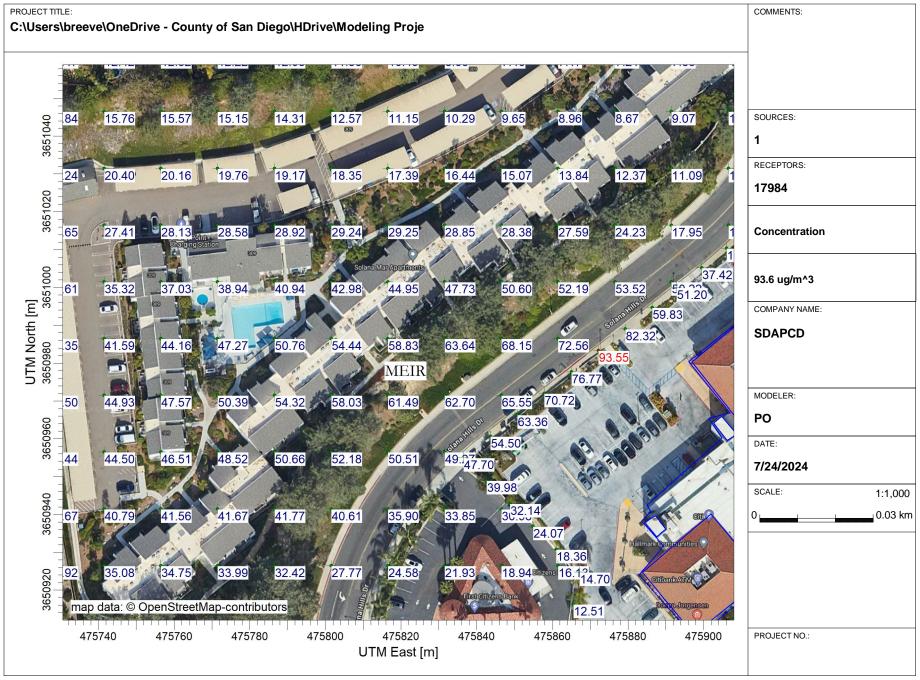
FACILITY NAME: Netly Fiber Holdings

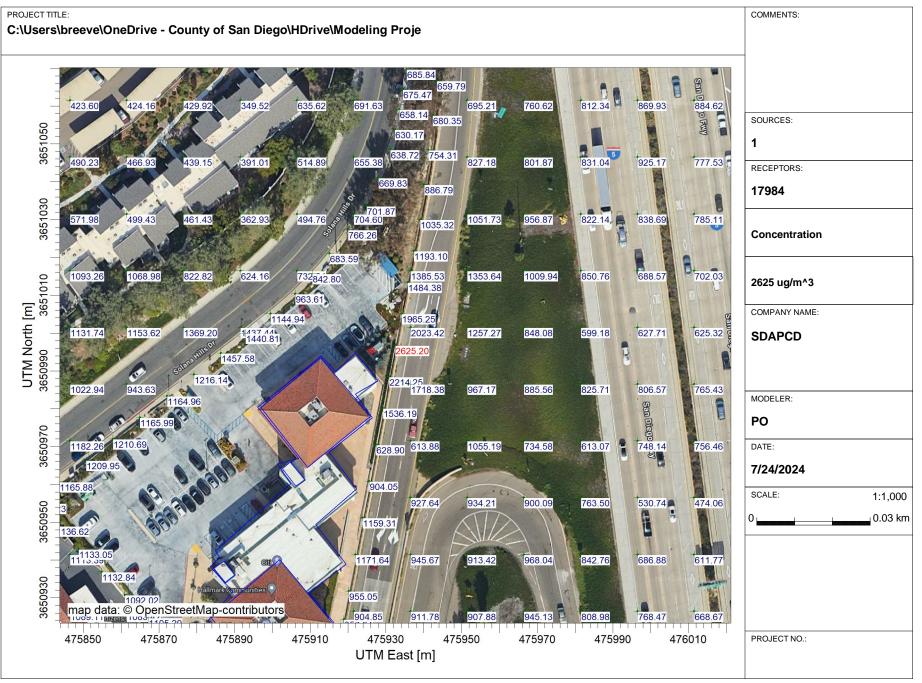
Fuel Consumption (gal/hr): 10.04 0.11936 Diesel Particulate Emission Factor (g/hp-hr): Brake Horsepower (hp): 198 Annual Hours of Operation (hrs): 50

> FACILITY ID: APCD2024-SITE-04517 APPLICATION NO.: APCD2024-APP-008188

RISK ANALYST ONLY **DISPERSION MODELING DATA** Annual Receptor Type: Resident ANNUAL DISPERSION FACTOR (µg/m3)/(g/s): 58.8 Distance (m): Hourly Receptor Type: PMI

APPLICATION NO.: ENGINEER:		HOURLY DISPERSION FACTOR (μg/m3)/(g/s): 2625.2 Distance (m):						
	Emission	Acute	Annual	Acute	Annual	Hourly	Annual	
CHEMICAL NAME	Factor	Emission Rate	Emission Rate	Emissions Rate	Emission Rate	GLC	GLC 3	
	lb/1000 gal	lb/hr	lb/yr	g/s	g/s	μg/m ³	μg/m ³	
DIESEL PARTICULATE			2.60E+00		3.74E-05		2.20E-03	
ACETALDEHYDE	7.83E-01	7.86E-03	3.93E-01	9.91E-04		2.60E+00		
ACROLEIN*	3.39E-02	3.40E-04	1.70E-02	4.29E-05		1.13E-01		
ARSENIC COMPOUNDS	1.60E-03	1.61E-05	8.03E-04	2.02E-06		5.31E-03		
BENZENE	1.86E-01	1.87E-03	9.35E-02	2.36E-04		6.19E-01		
BUTADIENE, 1,3-	2.17E-01	2.18E-03	1.09E-01	2.75E-04		0.7206536		
CADMIUM AND COMPOUNDS	1.50E-03	1.51E-05	7.53E-04	1.90E-06		4.98E-03		





*** AERMOD - VERSION 23132 *** *** C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje *** 07/23/24 *** AERMET - VERSION 22112 *** *** 09:24:16 PAGE 1 RegDFAULT CONC ELEV URBAN SigA Data *** MODELOPTs: *** MODEL SETUP OPTIONS SUMMARY *** POINT SOURCE DATA *** NUMBER EMISSION RATE BASE STACK STACK URBAN CAP/ EMIS RATE STACK STACK BLDG SOURCE PART. (GRAMS/SEC) Χ Υ ELEV. HEIGHT TEMP. EXIT VEL. DIAMETER EXISTS SOURCE HOR SCALAR (METERS) (METERS) (METERS) (DEG.K) (M/SEC) (METERS) ID CATS. VARY BY STCK1 0 0.10000E+01 475926.2 3650995.4 41.3 2.68 747.04 32.45 0.13 YES YES ↑ *** AERMOD - VERSION 23132 *** *** C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje *** 07/23/24 *** AERMET - VERSION 22112 *** *** 09:24:16 PAGE 3 RegDFAULT CONC ELEV URBAN SigA Data *** MODELOPTs: ** Model Options Selected: * Model Uses Regulatory DEFAULT Options * Model Is Setup For Calculation of Average CONCentration Values. * NO GAS DEPOSITION Data Provided. * NO PARTICLE DEPOSITION Data Provided. * Model Uses NO DRY DEPLETION. DDPLETE = F * Model Uses NO WET DEPLETION. WETDPLT = F * Stack-tip Downwash. * Model Accounts for ELEVated Terrain Effects. * Use Calms Processing Routine. * Use Missing Data Processing Routine. * No Exponential Decay. * Model Uses URBAN Dispersion Algorithm for the SBL for 1 Source(s), for Total of 1 Urban Area(s): Urban Population = 189946.0; Urban Roughness Length = 1.000 m * Urban Roughness Length of 1.0 Meter Used. * CCVR Sub - Meteorological data includes CCVR substitutions * NOTURBST - Meteorological data Ignore turbulence - stable hours

```
* The User Specified a Pollutant Type of: OTHER
**Model Calculates 1 Short Term Average(s) of: 1-HR
   and Calculates PERIOD Averages
                         1 Source(s);
                                            1 Source Group(s); and 17984 Receptor(s)
**This Run Includes:
               with:
                         1 POINT(s), including
                                                0 POINTHOR(s)
                         0 POINTCAP(s) and
                         0 VOLUME source(s)
                and:
                         0 AREA type source(s)
                and:
                         0 LINE source(s)
                and:
                         0 RLINE/RLINEXT source(s)
                and:
                         0 OPENPIT source(s)
                and:
                         0 BUOYANT LINE source(s) with a total of
                and:
                                                                      0 line(s)
                         0 SWPOINT source(s)
               and:
**Model Set To Continue RUNning After the Setup Testing.
**The AERMET Input Meteorological Data Version Date: 22112
**Output Options Selected:
        Model Outputs Tables of PERIOD Averages by Receptor
        Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)
        Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
        Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword)
**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
                                                               m for Missing Hours
                                                               b for Both Calm and Missing Hours
**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) =
                                                               39.00 ; Decay Coef. =
                                                                                         0.000
                                                                                                   ; Rot. Angle =
                                                                                                                       0.0
                Emission Units = GRAMS/SEC
                                                                          ; Emission Rate Unit Factor = 0.10000E+07
                Output Units = MICROGRAMS/M**3
**Approximate Storage Requirements of Model =
                                                  5.5 MB of RAM.
```

* Model Assumes No FLAGPOLE Receptor Heights.

**Input Runstream File: aermod.inp
**Output Print File: aermod.out

**Detailed Error/Message File: 8188_Netly.err **File for Summary of Results: 8188 Netly.sum

*** MODELOPTs: RegDFAULT CONC ELEV URBAN SigA Data

*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
(1=YES; 0=NO)

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

*** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***

(METERS/SEC)

1.54, 3.09, 5.14, 8.23, 10.80,

*** MODELOPTs: RegDFAULT CONC ELEV URBAN SigA Data

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

Surface file: ..\..\AERMET\AERMET 22112 data\DMR 2010_2012_sigma_v22112.SFC Met Version: 22112

Profile file: ..\..\AERMET\AERMET 22112 data\DMR 2010_2012_sigma_v22112.PFL

Surface format: FREE Profile format: FREE

Surface station no.: 3177 Upper air station no.: 3190

Name: UNKNOWN
Year: 2010
Name: UNKNOWN
Year: 2010

First 24 hours of scalar data

YR	МО	DY	JDY	HR	Н0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS	WD	HT	REF TA	HT
	01			01				-9.000		27.	4.3	0.04	0.32		1.34	57.	10.0	284.2	2.0
	01			02	-2.6			-9.000		27.	4.3	0.04	0.32		1.34	59.	10.0	283.8	2.0
	01		1	03	-4.5			-9.000		40.	5.6	0.04	0.32		1.78	72.	10.0	283.1	2.0
10	01	01	1	04	-1.1	0.033	-9.000	-9.000	-999.	14.	2.8	0.04	0.32	1.00	0.89	52.	10.0	283.1	2.0
10	01	01	1	05	-0.3	0.016	-9.000	-9.000	-999.	5.	1.4	0.04	0.32	1.00	0.44	60.	10.0	283.1	2.0
10	01	01	1	06	-2.6	0.049	-9.000	-9.000	-999.	26.	4.2	0.04	0.32	1.00	1.34	77.	10.0	283.1	2.0
10	01	01	1	07	-4.5	0.066	-9.000	-9.000	-999.	40.	5.6	0.04	0.32	1.00	1.78	80.	10.0	282.0	2.0
10	01	01	1	80	-5.7	0.082	-9.000	-9.000	-999.	57.	8.8	0.04	0.32	0.47	2.23	89.	10.0	283.8	2.0
10	01	01	1	09	17.6	0.041	0.281	0.016	46.	20.	-1.0	0.01	0.32	0.26	0.44	301.	10.0	287.5	2.0
10	01	01	1	10	42.3	0.127	0.475	0.010	91.	108.	-4.4	0.03	0.32	0.19	1.34	356.	10.0	289.2	2.0
10	01	01	1	11	59.7	0.075	0.671	0.009	182.	50.	-1.0	0.01	0.32	0.17	0.89	318.	10.0	292.0	2.0
10	01	01	1	12	67.5	0.101	0.839	0.008	315.	77.	-1.4	0.01	0.32	0.16	1.34	321.	10.0	291.4	2.0
10	01	01	1	13	66.3	0.124	0.907	0.008	405.	105.	-2.6	0.01	0.32	0.16	1.78	320.	10.0	290.9	2.0
10	01	01	1	14	55.8	0.123	0.898	0.008	466.	103.	-3.0	0.01	0.32	0.17	1.78	309.	10.0	289.8	2.0
10	01	01	1	15	37.0	0.119	0.804	0.008	504.	98.	-4.1	0.01	0.32	0.20	1.78	321.	10.0	290.3	2.0
10	01	01	1	16	11.0	0.113	0.540	0.008	514.	91.	-11.7	0.03	0.32	0.29	1.34	341.	10.0	289.8	2.0
10	01	01	1	17	-1.0	0.031	-9.000	-9.000	-999.	20.	2.8	0.03	0.32	0.57	0.89	340.	10.0	288.8	2.0
10	01	01	1	18	-0.2	0.015	-9.000	-9.000	-999.	5.	1.3	0.03	0.32	1.00	0.44	341.	10.0	287.5	2.0
10	01	01	1	19	-2.3	0.049	-9.000	-9.000	-999.	26.	4.5	0.04	0.32	1.00	1.34	18.	10.0	287.0	2.0
10	01	01	1	20	-2.5	0.050	-9.000	-9.000	-999.	27.	4.3	0.04	0.32	1.00	1.34	38.	10.0	287.0	2.0
10	01	01	1	21	-1.1	0.033	-9.000	-9.000	-999.	14.	2.8	0.04	0.32	1.00	0.89	63.	10.0	285.9	2.0
10	01	01	1	22	-1.1	0.033	-9.000	-9.000	-999.	14.	2.8	0.04	0.32	1.00	0.89	65.	10.0	285.3	2.0
10	01	01	1	23	-1.1	0.033	-9.000	-9.000	-999.	14.	2.8	0.04	0.32	1.00	0.89	56.	10.0	285.3	2.0
10	01	01	1	24	-1.1	0.033	-9.000	-9.000	-999.	14.	2.8	0.04	0.32	1.00	0.89	51.	10.0	285.3	2.0

First hour of profile data

YR MO DY HR HEIGHT F WDIR WSPD AMB_TMP sigmaA sigmaW sigmaV 10 01 01 01 10.0 1 57. 1.34 -999.0 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)

*** MODELOPTs: RegDFAULT CONC ELEV URBAN SigA Data

*** MODELOPTs: RegDFAULT CONC ELEV URBAN SigA Data

*** THE SUMMARY OF MAXIMUM PERIOD (26304 HRS) RESULTS ***

**

** CONC OF OTHER IN MICROGRAMS/M**3

NETWORK RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE GRID-ID GROUP ID AVERAGE CONC ALL 1ST HIGHEST VALUE IS 93.55418 AT (475872.12, 3650983.36, 40.46, 91.42, 0.00) DC 2ND HIGHEST VALUE IS 82.31731 AT (475879.24, 3650989.03, 91.10, 0.00) DC 41.08, 3RD HIGHEST VALUE IS 0.00) DC 76.76559 AT (475864.99, 3650977.69, 40.19, 91.42, 4TH HIGHEST VALUE IS 72.56404 AT (475861.50, 3650986.50, 40.34, 91.42, 0.00) DC 5TH HIGHEST VALUE IS 70.72055 AT (475857.86, 3650972.03, 39.79, 91.42, 0.00) DC 6TH HIGHEST VALUE IS 68.14808 AT (475846.50, 3650986.50, 41.70, 91.38, 0.00) DC 65.55179 AT (475846.50, 3650971.50, 7TH HIGHEST VALUE IS 39.34, 91.52, 0.00) DC 8TH HIGHEST VALUE IS 64.92810 AT (475929.20, 3650980.17, 40.80, 90.03, 0.00) DC 9TH HIGHEST VALUE IS 63.63590 AT (475831.50, 3650986.50, 89.86, 0.00) DC 45.14, 10TH HIGHEST VALUE IS 63.35913 AT (475850.73, 3650966.36, 0.00) DC 39.78, 91.38. *** RECEPTOR TYPES: GC = GRIDCART GP = GRIDPOLR DC = DISCCART DP = DISCPOLR↑ *** AERMOD - VERSION 23132 *** *** C:\Users\breeve\OneDrive - County of San Diego\HDrive\Modeling Proje *** 07/23/24 *** AERMET - VERSION 22112 *** *** 09:24:16 PAGE 5

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	RECEPT(OR (XR, YR,	ZELEV, ZHIL 	L, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL HIGH 1ST HIGH VALUE I	S 2625.20111 (ON 11091012: AT (475932.47,	3650996.80,	41.56,	90.80,	0.00) DC	
*** RECEPTOR TYPES: GC = GRIDCA GP = GRIDPA DC = DISCOA DP = DISCPA *** AERMOD - VERSION 23132 **	OLR ART OLR * *** C:\Users\	breeve\OneDrive -	County of San	Diego\HDriv	e\Modeling	•		
*** AERMET - VERSION 22112 *** *** MODELOPTs: RegDFAULT CO		SigA Data				***	09:24: PAGE	
*** Message Summary : AERMOD Mod								
Summary of Total Mes								
A Total of 0 Fatal E A Total of 9 Warning	rror Message(s)							
A Total of 9 Warning A Total of 15042 Informa	tional Message(s)							
A Total of 26304 Hours W	ere Processed							
A Total of 1791 Calm Ho	urs Identified							
A Total of 505 Missing	Hours Identified	(1.92 Percent)						
****** FATAL ERROR MESSAGE:	S *****							

*** NONE ***

	*****	WARNING	MESSAGES	******	k								
MX	W403	102	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data
MX	W403	1	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data
MX	W403	2	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data
MX	W403	3	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data
MX	W403	4	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data
MX	W403	5	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data
MX	W403	6	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data
MX	W403	7	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data
MX	W403	8	PFLCNV:	Turbulence	data	is	being	used	w/o	ADJ_U*	option	SigA	Data