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Description:	From Jack P. Broadbent, Executive Officer, APCO, Bay Area Quality
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Connect with the
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12/21/2020

Mr. Richard Corey
Executive Officer *Richard*
California Air Resources Board
1001 I Street,
Sacramento, CA 95814

Mr. Drew Bohan
Executive Director *Drew*
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: BACT Determination for Diesel Back-Up Engines Greater than or equal to 1,000 Brake Horsepower

Dear Mr. Corey and Mr. Bohan,

The purpose of this letter is to inform your agencies that the Bay Area Air Quality Management District (Air District) has established a best available control technology (BACT) guideline for large (greater or equal to 1,000 brake horsepower) diesel engines used for emergency standby power that requires them to meet the U. S. EPA's Tier 4 emissions standards. This determination will apply to any new and open permit application with a diesel backup engine ≥ 1000 bhp that is deemed complete after 1/1/2020.

The Air District is the entity charged with permitting for stationary sources of air pollution in the nine-county region surrounding the San Francisco bay. Air District permits are required by law for:

- Any stationary equipment that may cause air pollution;
- Modifications to existing permitted equipment or their permit conditions;
- Permitted equipment that is moved to a new location;
- Transfer of permitted equipment to new owners; and
- Installation of equipment used to control emissions.

As part of our permitting processes, The Air District's New Source Review Rule - Regulation 2, Rule 2 (Regulation 2, Rule 2) - requires that new or modified sources of air pollutants undergo permit review for Best Available Control Technology (BACT). BACT2 "Achieved-In-Practice", applies to the most effective emission controls already in use or the most stringent emission limit achieved in the field for the type and capacity of equipment comprising the source under review and operating under similar conditions.

Regulation 2, Rule 2, states that any new or modified source which results in an increase in emissions of precursor organic compounds (POC), non-precursor organic compounds (NPOC), nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM₁₀), or carbon monoxide (CO) in excess of 10 pounds per highest day must be reviewed for possible application of BACT. California Health and Safety Code Section 42300 authorizes delegation of stationary source permitting authority from the state to the local air pollution control districts, including the setting of rules and definitions.


For the BACT Guideline, the Air District relied on its evaluations of the following projects, which are both emergency standby engines that are installed and operating in compliance with the U.S. EPA Tier 4 emissions standards:

- Air District Permit Application 27020 (San Jose – Santa Clara Regional Wastewater Facility, Four Emergency Diesel Standby Engines, each 4,376 BHP)
- Air District Permit Application 25115 (Sutro Tower, Inc., Emergency Diesel Standby Engine, 1,881 BHP).

The Air District also relied on an evaluation of the permit and source test results of the Microsoft – MWH Data Center, in Quincy, Washington. The permit limits that Microsoft complies with are in units of g/bhp-hr: 0.5 NO_x, 0.14 NMHC, 0.02 PM filterable, 2.6 CO. These emergency diesel standby engines ranged from 0.75 MWe to 3.0 MWe.

Thank you for your attention and If you have any questions regarding this letter, please contact Damian Breen, Senior Deputy Executive Officer at (415) 749-5041.

Sincerely,



Jack P. Broadbent
Executive Officer/APCO