

DOCKETED	
Docket Number:	24-OPT-04
Project Title:	Potentia-Viridi Battery Energy Storage System
TN #:	261428
Document Title:	DR Response 2 - Attachment 5, BAAQMD Correspondence - Part 2
Description:	This document (part 2 of 2) provides all correspondence between Dudek and the BAAQMD, including permit application for use of emergency generators.
Filer:	Ronelle Candia
Organization:	Dudek
Submitter Role:	Applicant Consultant
Submission Date:	1/29/2025 10:29:06 AM
Docketed Date:	1/29/2025

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

375 Beale Street, Suite 600, San Francisco, CA 94105. . . (415) 749-4990 . . . FAX (415) 749-5030 OR 4949
WEBSITE: WWW.BAAQMD.GOV

Health Risk Assessment

IMPORTANT: For any permit application that requires a Health Risk Assessment, fill out one form for each source that emits a Toxic Air Contaminant(s) [or for a group of sources that exhaust through a common stack]. Emissions can be from a discrete point source (with stack) or a source with fugitive emissions (area or volume source). You must provide a plot plan (drawn to scale, if possible) and a local map (aerial photos are recommended), which clearly demonstrate the location of your site, the source(s), property lines, and any surrounding buildings [see attached example]. Label streets, schools, residences, and other businesses. List major dimensions of all buildings surrounding the source in Section C.

Plant Name: Potentia Viridi Engery StoragePlant No.:

Source Description: Two Emergency Generators

Source No.: S- (if known)Emission Point No.: P- (if known)

SECTION A (Point Source)

1. Does the source exhaust at clearly defined emission point; i.e., a stack or exhaust pipe? YES OR NO
(If YES continue at #2, If NO, skip to Section B)
2. Does the stack (or exhaust pipe) stand alone or is it located on the roof of a building? alone OR on roof
Important: If stack is on a roof, provide building dimensions on line B1 in Section C.
3. What is the height of the stack outlet above ground level? 21 feet OR meters?
4. What is the inside diameter of the stack outlet? inches OR 2.3 feet OR meters
5. What is the direction of the exhaust from the stack outlet? horizontal OR vertical
6. Is the stack outlet: open or hinged rain flap OR rain capped (deflects exhaust downward or horizontally)
7. What is the exhaust flowrate during normal operation? 24,791 cfm (cubic feet/min) OR meters³/second
8. What is the typical temperature of the exhaust gas? degrees Fahrenheit OR 519 degrees Celsius
(Skip Section B and Go on to Section C)

SECTION B (Area/Volume Source)

This section applies to fugitive emissions that are NOT captured by a collection system nor directly emitted through a stack or other emission point. Volume sources have fugitive emissions generally released within a building or other defined space (e.g., dry cleaner, gasoline station canopy). Area sources are generally flat areas of release (e.g., landfill, quarry).

1. Is the emission source located within a building? YES (go to #2) OR NO (go to #3)
2. If YES (source inside building), provide building dimensions on line B1 in Section C

a. Does the building have a ventilation system that is vented to the outside? YES OR NO

b. If NO (ventilation), are the building's doors & windows kept open during hours of operation? YES OR NO
3. If NO (source not inside building), provide a description of the source, dimensions, & indicate location on plot plan.

(Go on to Section C)

SECTION C (Building Dimensions)

Provide building dimensions. Use Line B1 only for building with source/stack on the roof or with fugitive emissions inside building. Use Lines B2-B9 for buildings surrounding the source (within 300 feet). Distance and direction are optional if map and/or aerial photo are adequately labeled with locations of buildings. Check one for units: ☐ feet OR ☐ meters

B#	Building name or description	Height	Width	Length	Distance To Source	Direction To Source
B1	Building with source:	21	12	25.5	n/a	n/a
B2	BESS cabinet	15	33	160	778	West
B3	BESS cabinet	15	33	211	622	West
B4	BESS cabinet	15	33	211	476	West
B5	BESS cabinet	15	33	211	273	Northeast
B6	BESS cabinet	15	33	140	630	Northeast
B7	BESS cabinet	15	33	140	824	Northeast
B8	O&M Building	28	125	125	800	Northeast
B9						

NOTE: Label buildings by B# on plot plan, map and/or aerial photo. Provide comments below for any details that need additional clarification (e.g., list buildings that are co-occupied by your employees and other workers, residents, students, etc).

The only true building is the O&M building. The rest of the structures are the battery energy storage cabinets. We've included them for factoring in downwash.

(Go on to Section D)

SECTION D (Receptor Locations)

NOTE: Indicate on maps or aerial photos the residential and nonresidential areas surrounding your facility.

- Indicate the area where the source is located (check one):
☐ zoned for residential use ☐ zoned for mixed residential and commercial/industrial use
☐ zoned for commercial and/or industrial use ☒ zoned for agricultural use
- Distance from source (stack or building) to nearest facility property line = 895 feet OR _____ meters
- Distance from source (stack or building) to the property line of the nearest residence = _____ feet OR _____ meters
- Describe the nearest nonresidential property (check one): ☒ Industrial/Commercial OR ☐ Other _____
PG&E Substation
- Distance from source (stack or building) to property line of nearest nonresidential site = 1900 feet OR _____ meters
- Distance from source to property line of nearest school* (or school site) = _____ feet OR ☒ Greater than 1,000 feet

[Note: Helpful website with California Dept. of Education data: www.greatschools.net]

Provide the names and addresses of all schools* that have property line(s) within 1,000 feet of the source:

NA

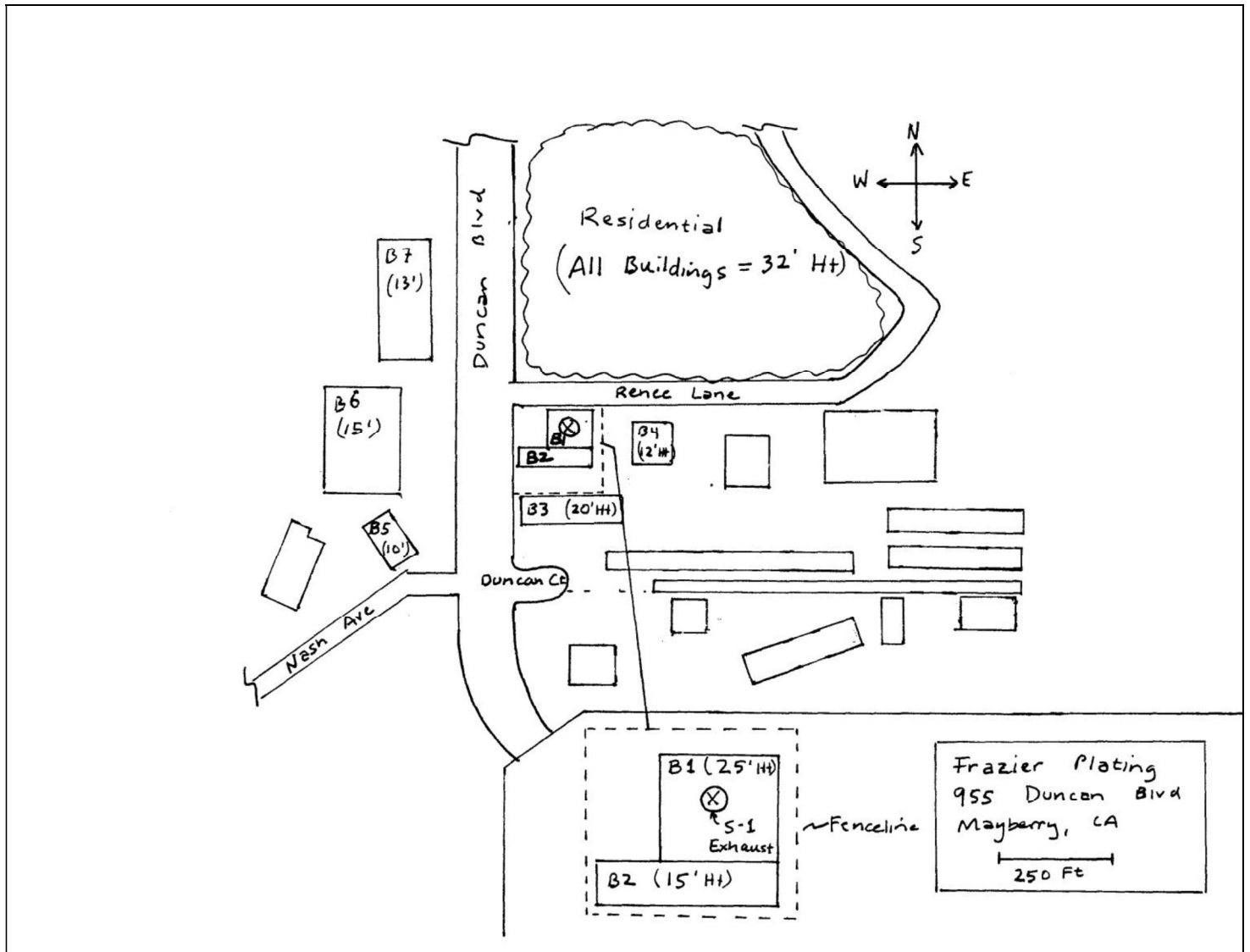
*K-12 and more than twelve children only

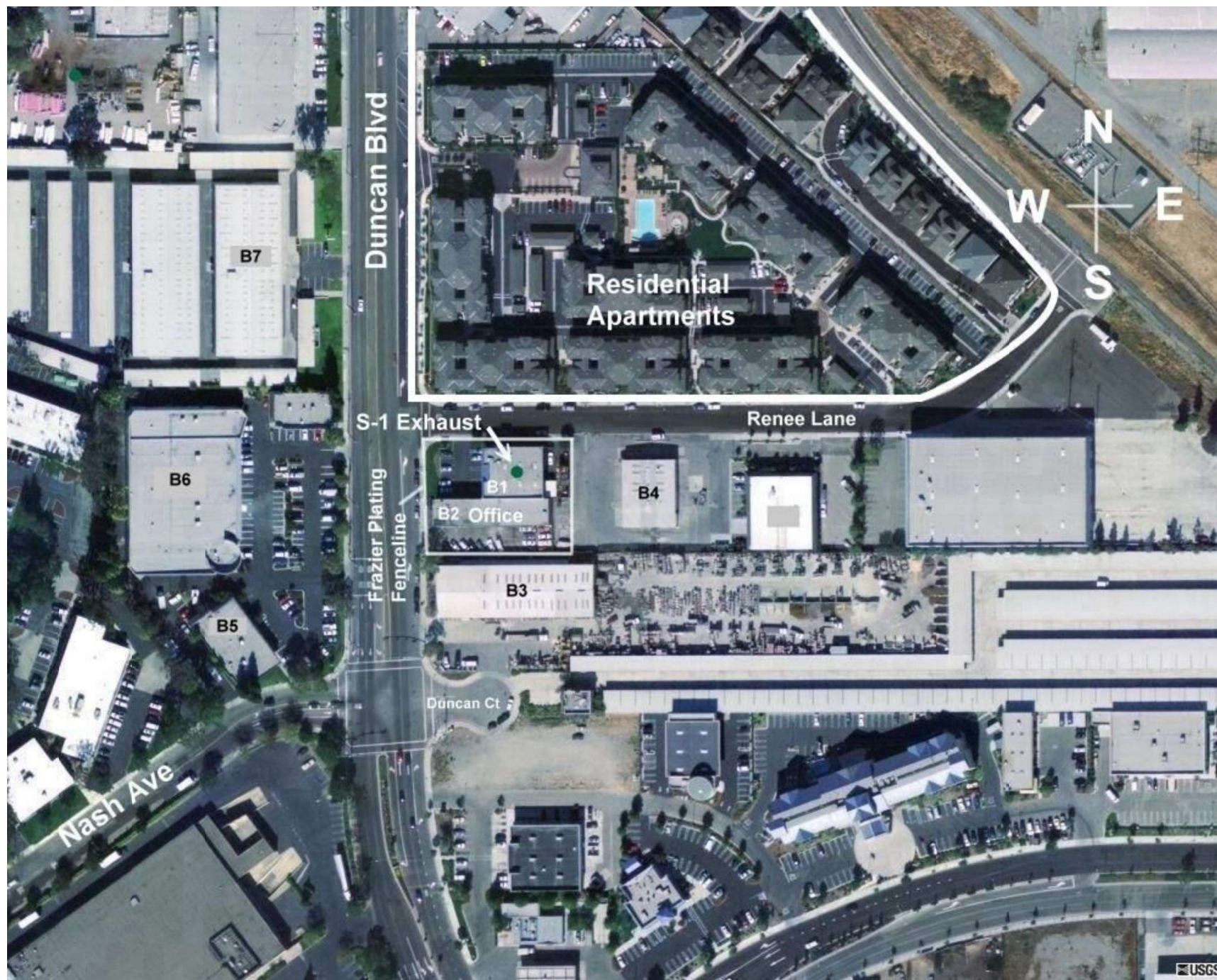
EXAMPLE:

Check one for units: ☒ feet OR ☐ meters

B#	Building or Description	Height	Width	Length	Distance to Source	Direction to Source
B1	Building with source: Frazier Plating, shop	25	100	100	N/a	N/a
B2	Frazier Plating, office	15	50	175	40	N
B3	7-Eleven	20	50	225	100	N
B4	Ye Old Oak Cooper	12	63	225	100	W
B5	Floyd's Barber Shop	10	69	112	225	NE
B6	Goober's Car Care	15	175	225	220	E
B7	Exito Enterprises	13	115	275	220	SE
B8	Residential (9 Apartment Bldgs)	32	60	130	Various	S

Frazier Plating, 955 Duncan Blvd, Mayberry, CA







Diesel Generator Set

mtu 20V4000 DS3250 43 °C

3,250 kWe/60 Hz/Standby/480 - 13,800V



System ratings

Voltage (L-L)	480V † ‡	600V ‡	4,160V	12,470V	13,200V	13,800V
Phase	3	3	3	3	3	3
PF	0.8	0.8	0.8	0.8	0.8	0.8
Hz	60	60	60	60	60	60
kW	3,250	3,250	3,250	3,250	3,250	3,250
kVA	4,062	4,062	4,062	4,062	4,062	4,062
Amps	4,886	3,909	563	188	177	170
skVA@30% voltage dip	5,325	5,875	5,760	5,210	5,840	6,380
Generator model*	941-VL60	941-VL70	941-M60	4P9.6-2400	4P9.6-2400	4P9.6-2400
Temp rise	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C	130 °C/40 °C
Connection	6 LEAD WYE	6 LEAD WYE	6 LEAD WYE	6 LEAD WYE	6 LEAD WYE	6 LEAD WYE

* Consult the factory for alternate configuration. Generator model may end with -M or -R, depending on selection.

† UL 2200 offered

‡ CSA offered

Certifications and standards

- Emissions
 - EPA Tier 2 certified
 - South Coast Air Quality Management District (SCAQMD)
- Generator set is designed and manufactured in facilities certified to standards ISO 9001:2008 and ISO 14001:2004
- Seismic certification – optional
 - 2021 IBC certification
 - HCAI pre-approval
- UL 2200 - optional (refer to *System ratings* for availability)
- CSA - optional (refer to *System ratings* for availability)
 - CSA C22.2 No. 100
 - CSA C22.2 No. 14
- Performance Assurance Certification (PAC)
 - Generator set tested to ISO 8528-5 for transient response
 - Verified product design, quality, and performance integrity
 - All engine systems are prototype and factory tested
- Power rating
 - Accepts rated load in one step per NFPA 110
 - Permissible average power output during 24 hours of operation is approved up to 85%.

Standard features*

- Single source supplier
- Global product support
- Two (2) Year/3,000 Hour Basic Limited Warranty
- 20V4000 diesel engine
 - 95.4 liter displacement
 - Common rail fuel injection
 - 4-cycle
- HVO and GtL fuels meeting fuel specification EN15940
- Complete range of accessories
- Cooling system
 - Integral set-mounted
 - Engine-driven fan
- Generator
 - Brushless, rotating field generator
 - 2/3 pitch windings
 - Permanent Magnet Generator (PMG) supply to regulator
 - 300% short circuit capability
- Digital control panel(s)
 - UL recognized, CSA certified, NFPA 110
 - Complete system metering
 - LCD display

Standard equipment*

Engine

- Air cleaners
- Oil pump
- Oil drain extension and shut-off valve
- Full flow oil filter
- Closed crankcase ventilation
- Jacket water pump
- Inter cooler water pump
- Thermostats
- Blower fan and fan drive
- Radiator - unit mounted
- Electric starting motor - 24V
- Governor - electronic isochronous
- Base - structural steel
- SAE flywheel and bell housing
- Charging alternator - 24V
- Battery box and cables
- Bulkhead fuel connectors
- Flexible exhaust connection
- EPA certified engine

Generator

- NEMA MG1, IEEE, and ANSI standards compliance for temperature rise and motor starting
- Sustained short circuit current of up to 300% of the rated current for up to 10 seconds
- Self-ventilated and drip-proof
- Superior voltage waveform
- Digital, solid state, volts-per-hertz regulator
- Brushless alternator with brushless pilot exciter
- 4 pole, rotating field
- 130 °C standby temperature rise
- 2-bearing, sealed
- Flexible coupling
- Full amortisseur windings
- 125% rotor balancing
- 3-phase voltage sensing
- $\pm 0.25\%$ voltage regulation no load to full load
- 5% maximum total harmonic distortion

Digital control panel(s)

- Digital metering
- Engine parameters
- Generator protection functions
- Engine protection
- CANBus ECU communications
- Windows®-based software
- Multilingual capability
- Communications to remote annunciator
- Programmable input and output contacts
- UL recognized, CSA certified, CE approved
- Event recording
- IP 54 front panel rating with integrated gasket
- NFPA 110 compatible

Application data

Engine

Manufacturer	mtu
Model	20V4000G94S
Type	4-cycle
Arrangement	20-V
Displacement: L (in ³)	95.4 (5,822)
Bore: cm (in)	17 (6.69)
Stroke: cm (in)	21 (8.27)
Compression ratio	16.4:1
Rated rpm	1,800
Engine governor	electronic isochronous (ADEC)
Maximum power: kWm (bhp)	3,490 (4,680)
Steady state frequency band	± 0.25%
Air cleaner	dry

Liquid capacity

Total oil system: L (gal)	390 (103)
Engine jacket water capacity: L (gal)	205 (54.2)
After cooler water capacity: L (gal)	50 (13.2)
System coolant capacity: L (gal)	860 (227)

Electrical

Electric volts DC	24
Cold cranking amps under -17.8 °C (0 °F)	4,200
Batteries: group size	8D
Batteries: quantity	6

Fuel system

Fuel supply connection size	-16 JIC 37° female 1" NPT adapter provided
Fuel return connection size	-16 JIC 37° female 1" NPT adapter provided
Maximum fuel lift - cranking: m (ft)	1 (3.3)*
Maximum fuel lift - running: m (ft)	3.1 (10)
Recommended fuel	diesel #2/HVO
Total fuel flow: L/hr (gal/hr)	1,620 (428)

Fuel consumption

At 100% of power rating: L/hr (gal/hr)	844 (223)
At 75% of power rating: L/hr (gal/hr)	644 (170)
At 50% of power rating: L/hr (gal/hr)	447 (118)

Cooling - radiator system

Ambient capacity of radiator: °C (°F)	43 (108)
Maximum restriction of cooling air: intake and discharge side of radiator: kPa (in. H ₂ O)	0.12 (0.5)
Water pump capacity: L/min (gpm)	1,567 (414)
After cooler pump capacity: L/min (gpm)	567 (150)
Heat rejection to coolant: kW (BTUM)	1,300 (73,929)
Heat rejection to after cooler: kW (BTUM)	970 (55,163)
Heat radiated to ambient: kW (BTUM)	237 (13,472)
Fan power: kW (hp)	60.6 (81.3)

Air requirements

Aspirating: *m ³ /min (SCFM)	264 (9,323)
Air flow required for radiator cooled unit: *m ³ /min (SCFM)	3,082 (108,843)
Remote cooled applications; air flow required for dissipation of radiated generator set heat for a maximum of 25 °F rise: *m ³ /min (SCFM)	866 (30,384)

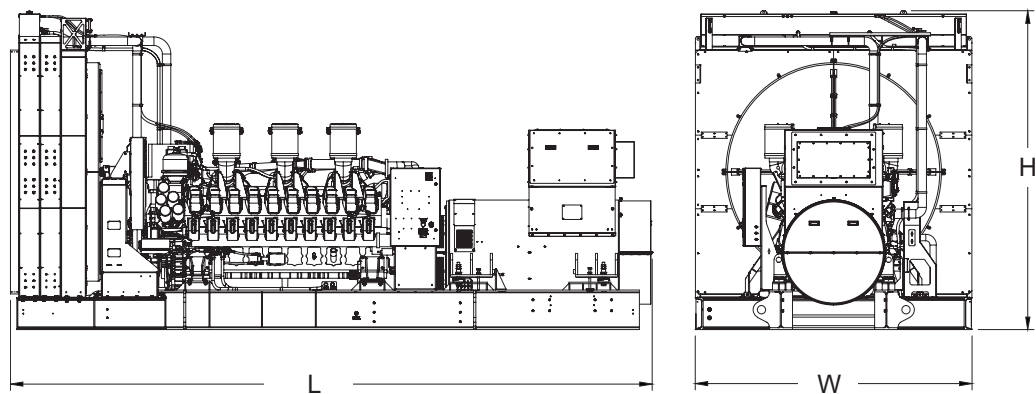
* Air density = 1.184 kg/m³ (0.0739 lbm/ft³)

Exhaust system

Gas temperature (stack): °C (°F)	525 (977)
Gas volume at stack temperature: m ³ /min (CFM)	702 (24,791)
Maximum allowable back pressure at outlet of engine, before piping: kPa (in. H ₂ O)	8.5 (34.1)

* Fuel lift pump for cranking increases lift to: m (ft) 3.1 (10)

Weights and dimensions



Drawing above for illustration purposes only, based on standard open power 480 volt generator set. Lengths may vary with other voltages. Do not use for installation design. See website for unit specific template drawings.

System	Dimensions (L x W x H)	Weight
Open Power Unit (OPU)	7,756 x 3,072 x 3,590 mm (305.4 x 120.9 x 141.3 in)	27,340 kg (60,284 lb)

Weights and dimensions are based on open power units and are estimates only. Consult the factory for accurate weights and dimensions for your specific generator set.

Sound data

Unit type	Standby full load
Level 0 (OPU): dB(A)	95.1

Sound data is provided at 7 m (23 ft). Generator set tested in accordance with ISO 8528-10 and with infinite exhaust.

Emissions data

NO _x + NMHC	CO	PM
5.1	0.6	0.03

— All units are in g/hp-hr and shown at 100% load (not comparable to EPA weighted cycle values). Emission levels of the engine may vary with ambient temperature, barometric pressure, humidity, fuel type and quality, installation parameters, measuring instrumentation, etc. The data was obtained in compliance with US EPA regulations. The weighted cycle value (not shown) from each engine is guaranteed to be within the US EPA standards.

Rating definitions and conditions

- Standby ratings apply to installations served by a reliable utility source. The standby rating is applicable to varying loads for the duration of a power outage. No overload capability for this rating. Ratings are in accordance with ISO 8528-1, ISO 3046-1, BS 5514, and AS 2789. Average load factor: ≤ 85%.
- Nominal ratings at standard conditions: 25 °C and 300 meters (77 °F and 1,000 feet).
- Deration Factor:
 - Consult your local **mtu** Distributor for altitude derations.
 - Consult your local **mtu** Distributor for temperature derations.



Instructions: Application Cover Form – “P-101B” and “Facility Creation Form and Contacts”

Introduction

Use the following instructions to guide you through the ***Application Cover Form – P-101B and Facility Creation and Contacts Form*** and in assembling an application packet.

Minimum Requirements

Failure to submit the minimum forms in the format specified will result in the return of all submitted material.

The minimum submittal requirements to create an application with BAAQMD are:

1. Application Cover Form: P-101B
2. Facility Creation Form (For first time permittees only) and Facility Contacts Form (For first time permittees, but can be used to update contacts for existing facilities with permits – See Next Sections)
3. Cover letter on company letterhead describing the project
4. At least one (1) Data Form or a Permit Condition Change Request form
5. If the application contains Trade Secret information, submit the documents specified under Trade Secret section of this form.

Electronic submittals (preferred):

- Attachments must be PDF files only.
- Email plus attachments is limited to under 35 MB in size.

Paper submissions:

- No staples
- Two (2) copies of all data forms must be provided
- Paper size limited to 11”x17” size

Other Forms

Forms you may want to include in your application:

- HRA Form – Health Risk Assessments
- Form APPENDIX H- CEQA Information
- Permit Condition Change Request Form
- **Data Forms-** Source Information (if applicable)
 - Form A- Abatement Device
 - Form C- General Combustion Device
 - Form G- General Source
 - Form ICE: Internal Combustion Engines
 - Form S: Coating & Solvent Sources
 - Form T: Tank Devices
 - Form P: Emission Point
 - Boiler Registration form

Trade Secret information

If your application has extensive areas marked Trade Secret, this may delay the acceptance of your application.

To claim information as Trade Secret, please provide the following:

1. Rationale for each Trade Secret claim per the Government Code 6254.7
2. A “Trade Secret” Copy identifying the item
3. A “Public Copy” containing the redactions of the trade secret information

Where to Send?

Email your application materials to permits@baaqmd.gov or mail to:

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105

Still need help?

Call the Engineering Division at (415) 749-4990 or email permits@baaqmd.gov

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT****Application Cover Form – “P-101B form”**

All fields are required unless otherwise noted. Please type or print.
No information provided on this form can be marked trade secret.

Send to:
BAAQMD
Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105
Email: permits@baaqmd.gov

Phone: (415) 749-4990

1. Facility and Project Information

- If this facility does not have a current BAAQMD permit or active permit application (new facility), fill out the **Facility Creation and Contacts Form** part of this form.
- If this application is in response to a Notice of Violation from BAAQMD Compliance & Enforcement Division, please enter the NOV number here

Facility Name	Facility ID (except new facilities)
Potentia Viridi Energy Storage Facility	
Application Title/ Project or Equipment Description	
Two Emergency Generators	
Equipment/Project Location in relation to facility location (e.g., NW corner of facility OR 338 Washington Dr.) (Optional)	
Center of Facility in Laydown Yard.	

2. Application Contact

First Name	Last Name		
Nicholas	Lorenzen		
Business Name of Contact (If different from facility)		Contact Title	
Dudek		Air Resource Specialist	
Address Line 1		Address Line 2 (Optional)	
3760 State Street		Suite 101	
City	State	Zip Code	
Santa Barbara	CA	93101	
E-mail Address			
nlorenzen@dudek.com			
Primary Phone (xxx-xxx-xxxx)	Alternate Phone (Optional)		Fax Number (Optional)
805 308 8517			

3. Proximity to a School (K-12)

Is the equipment/project located within 1,000 ft of the outer boundary of the nearest school? ☐ Yes ☒ No

4. Additional Information: *The following additional information is required to complete all permit applications and should be included with your submittal. Failure to provide this information may delay the review of your application.*

- ☒ A facility map with street address or location and the property boundary, drawn roughly to scale, that locates the equipment and its emission points, completed data form(s), and a pollutant flow diagram for each piece of equipment. (See www.baaqmd.gov/forms/permits)
- ☒ Equipment/project description, manufacturer's data
- ☒ Discussion and/or calculations of air pollutant emissions from the equipment

5. Small Business Certification (optional): *If the facility identified in Part 1 qualifies as a small business as defined in Regulation 3, certify by checking boxes that your business meets all the following criteria. You may qualify for an application fee reduction.*

- ☐ The business does not employ more than 10 persons and its gross annual income does not exceed \$750,000.
- ☐ And the business is not an affiliate of a non-small business. (Note: a non-small business employs more than 10 persons and/or its gross income exceeds \$750,000.)

6. Green Business Certification (optional): *If the facility identified in Part 1 has been certified as a Green Business by the Association of Bay Area Governments and implemented by participating counties, check the box & include your documentation. You may qualify for an application fee reduction.*

- ☐ Green Business certificate included

An electronic version of this form and instructions can be found at www.baaqmd.gov.



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Application Cover Form – “P-101B form”

All fields are required unless otherwise noted. Please type or print.
No information provided on this form can be marked trade secret.

Send to:
BAAQMD
Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105
Email: permits@baaqmd.gov

Phone: (415) 749-4990

7. Accelerated Permitting (optional): The Accelerated Permitting Program entitles you to install and operate qualifying sources of air pollution and abatement equipment **while your permit application is being processed**. To qualify for this program, you must certify that your project will meet all of the following criteria. Please acknowledge each item by checking each box.

- ☐ Uncontrolled emissions of any single pollutant are each less than 10 lbs/highest day, or the equipment has been pre-certified by the BAAQMD.
- ☐ Uncontrolled emissions of toxic compounds do not exceed the trigger levels identified in Table 2-5-1 (see Regulation 2, Rule 5).
- ☐ The source is not a diesel engine.
- ☐ The project is not subject to public notice requirements (the source is either more than 1000 ft. from the nearest school, or the source does not emit any toxic compound in Table 2-5-1 of BAAQMD Regulation 2, Rule 5).
- ☐ For replacement of abatement equipment, the new equipment must have an equal or greater overall abatement efficiency for all pollutants than the equipment being replaced.
- ☐ For alterations of existing sources, the requested change does not result in an increase in emissions for all pollutants.
- ☐ Payment of all applicable permit application fees (the minimum permit fee to install and operate each source). See Regulation 3 or contact the Engineering Division for help in determining your fees.

8. CEQA Please answer the following questions pertaining to CEQA (California Environmental Quality Act).

- A Has another public agency prepared, required preparation of, or issued a notice regarding preparation of a California Environmental Quality Act (CEQA) document (initial study, negative declaration, environmental impact report, or other CEQA document) that analyzes impacts of this project or another project of which it is a part or to which it is related? If no, go to section 8B. Describe the document or notice, preparer, and date of document or expected date of completion:

The emergency generators are part of a Battery Energy Storage Project that is being processed through the California Energy Commission's AB 205 Process and they will serve as the lead agency for the CEQA documentation

- B List and describe any other permits or agency approvals required for this project by city, regional, state or federal agencies

- C List and describe all other prior or current projects for which either of the following statements is true: (1) the project that is the subject of this application could not be undertaken without the project listed below, (2) the project listed below could not be undertaken without the project that is the subject of this application:

Pontentia Viridi Energy Storage Project

9. Trade Secret Information: Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to the public, unless you have asked BAAQMD to treat certain items as trade secret as specified in Regulation 2, Rule 1, Section 402.7.

Does this application contain Trade Secret information? ☐ Yes ☒ No

- ☐ Each page containing trade secret information must be labeled “trade secret” with the trade secret information clearly marked and you must provide a “public copy” with the information redacted.
- ☐ For each item asserted to be trade secret, you must provide a statement which provides the basis for your claim.

10. Certification/Signature

I hereby certify that I am authorized to complete this form for the facility and that all information contained herein is true and correct.

I acknowledge that all documentation in this application submittal is a matter of public record unless otherwise indicated per Section 9 of this form.

Name	Title	
Nicholas Lorenzen	Air Resource Specialist	
Signature	Date (mm/dd/yy)	Phone (xxx-xxx-xxxx)
	1/3/2025	805-308-8517



Instructions: Facility Creation Form

Introduction Use the following instructions to help guide you through the **Facility Creation form**. You must submit a Facility Contacts form as well as this form. The Facility Contacts form can be used to update Facility Contacts at an existing facility.

Who should use this form? This form is for:

- New facilities, not previously permitted by BAAQMD at that location/address.
- Currently permitted facilities that will be changing locations. BAAQMD permits are not transferable. A new permit application is required.

Owning Entity & Type of Business **Owning Entity** - The individual, partnership, limited liability company, corporation, or other entity that owns or controls the permitted equipment and is responsible for the permit to operate. If no fictitious name is used, the owner can be the same name as the facility name above.

Type of Business

A partnership is an association of two or more persons to carry on as co-owners.

A sole proprietorship is owned and run by one individual and in which there is no legal distinction between the owner and the business.

Facility Physical Address If your facility does not currently have a physical address, enter a cross street or nearest street along with the city and zip code. Submit a map, outlining the physical boundaries of your property in addition to the form.

Overburdened Community: Overburdened Communities (OBC) are defined in Regulation 2, Rule 1, Section 243. Maps of OBCs are here:

<https://www.baaqmd.gov/about-air-quality/interactive-data-maps>

North American Industry Classification System code North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. This code represents the primary operation of your business, NOT the primary device permitted by BAAQMD.

Below are common NAICS codes:

811121	Automotive Body, Paint, and Interior Repair and Maintenance
812320	Dry Cleaning and Laundry Services (except Coin-Operated)
447110	Gas dispensing facility with Convenience Stores
447190	Gas dispensing facility without Convenience Stores

Still need help? Call the Engineering Division at (415) 749-4990.

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT****FACILITY CREATION FORM**

For new facilities or facilities not currently permitted by BAAQMD

All fields are required unless otherwise noted. Please type or print.

Send to:
BAAQMD
Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105
Email: permits@baaqmd.gov

Phone: (415) 749-4990

➤ A **Facility Contacts Form** must also be submitted with this form.**1. Facility Name**

Facility Name
Potentia Viridi Energy Storage Facility

2. Ownership and Business Type

Owning Entity
Levy Alameda, LLC

Type of Business (Select one)

- | | | |
|--|--|---|
| <input checked="" type="radio"/> Corporation | <input type="radio"/> Partnership | <input type="radio"/> Sole proprietorship |
| <input type="radio"/> Federal government | <input type="radio"/> State government | <input type="radio"/> Local government |

3. Facility Physical Address/Location☒ Check here, if this facility location address is unable to accept mail.☐ This facility does not have a street address. If checked, submit map with location marked. (See instructions)

Street Address or Intersection or Nearest Street		
17257 Patterson Pass Road		
Address Line 2 (Optional)		
City	State	Zip Code
Alameda County	CA	95377

Is this facility within an Overburdened Community, as defined in Regulation 2-1-243: ☐ Yes ☒ No (See instructions)**4. North American Industry Classification System Code**Enter your facility's primary NAICS code.

NAICS Code (6 digits)
221122

The following sites have keyword searches and other tools to help you determine the NAICS number: www.census.gov - or - www.naics.com**5. Certification/Signature** of person responsible for the information on this form.*I hereby certify that I am authorized to complete this form for the facility and that all information contained herein is true and correct.*

Name	Title	
Nicholas Lorenzen	Air Resources Specialist	
Signature	Date	Phone (xxx-xxx-xxxx)
	1/3/2025	805-308-8517

BAAQMD Office Use Only – Skip this section

BAAQMD Facility ID

**FACILITY CONTACTS FORM**

For contacts at new facilities and updates to existing facility contacts

All fields are required unless otherwise noted. Please type or print.

Send to:
BAAQMD
Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105
Email: permits@baaqmd.gov

Phone: (415) 749-4990

1. Purpose of submitting this form

This form is being submitted to: (Select one)

- ☒ Provide information on facility contacts for a new facility. (Complete all sections)
- ☐ Update information on current facility contacts (Complete Parts 1, 2, 6 and applicable contact sections)

2. Facility Name

Facility Name	BAAQMD Facility ID (except new facilities)
Potentia Viridi	

3. Owner Contact

First Name		Last Name	
Paul		Miller	
Business Name of Contact (If different from facility)		Contact Title	
Eurowind Energy		Country Manager	
Address Line 1		Address Line 2 (Optional)	
16875 W Bernardino Drive		Ste 200	
City	State	Zip Code	
San Diego	CA	92127	
E-mail Address			
pam@eurowindenergy.com			
Primary Phone (xxx-xxx-xxxx)	Alternate Phone (optional)	Fax Number (Optional)	
760-291-8603			

4. Operator Contact – Select existing contact or fill out information below.☐ Same as Owner Contact

First Name		Last Name	
Patrick		Leitch	
Business Name of Contact (If different from facility)		Contact Title	
Capstone Infrastructure		Chief Operating Officer	
Address Line 1		Address Line 2 (Optional)	
155 Wellington Street West		Suite 2930	
City	State	Zip Code	
Toronto	NA	NA	
E-mail Address			
pleitch@capstoneinfra.com			
Primary Phone (xxx-xxx-xxxx)	Alternate Phone (optional)	Fax Number (Optional)	
+1 (416) 649-1316			

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT****FACILITY CONTACTS FORM**

For contacts at new facilities and updates to existing facility contacts

All fields are required unless otherwise noted. Please type or print.

Send to:
BAAQMD
Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105
Email: permits@baaqmd.gov

Phone: (415) 749-4990

5. Billing Contact - Select existing contact or fill out information below.☐ Same as Owner Contact☐ Same as Operator Contact

First Name		Last Name	
Patrick		Leitch	
Business Name of Contact (If different from facility)		Contact Title	
Levy Alameda, LLC			
Address Line 1		Address Line 2 (Optional)	
155 Wellington Street West,		Suite 2930	
City	State	Zip Code	
Toronto	NA	M5V 3H1	
E-mail Address			
pleitch@capstoneinfra.com			
Primary Phone (xxx-xxx-xxxx)	Alternate Phone (optional)		Fax Number (Optional)
+1 (416) 649-1316			

6. Certification/Signature of person responsible for the information on this form.

I hereby certify that I am authorized to complete this form for the facility and that all information contained herein is true and correct.

Name	Title	
Nicholas Lorenzen	Air Resource Specialist.	
Signature	Date	Phone (xxx-xxx-xxxx)
	1/3/2025	805-308-8517



Instructions: Facility Creation Form

Introduction

Use the following instructions to help guide you through the **Facility Creation form**. You must submit a Facility Contacts form as well as this form. The Facility Contacts form can be used to update Facility Contacts at an existing facility.

Who should use this form?

This form is for:

- New facilities, not previously permitted by BAAQMD at that location/address.
- Currently permitted facilities that will be changing locations. BAAQMD permits are not transferable. A new permit application is required.

Owning Entity & Type of Business

Owning Entity - The individual, partnership, limited liability company, corporation, or other entity that owns or controls the permitted equipment and is responsible for the permit to operate. If no fictitious name is used, the owner can be the same name as the facility name above.

Type of Business

A partnership is an association of two or more persons to carry on as co-owners.

A sole proprietorship is owned and run by one individual and in which there is no legal distinction between the owner and the business.

Facility Physical Address

If your facility does not currently have a physical address, enter a cross street or nearest street along with the city and zip code. Submit a map, outlining the physical boundaries of your property in addition to the form.

Overburdened Community: Overburdened Communities (OBC) are defined in Regulation 2, Rule 1, Section 243. Maps of OBCs are here:

<https://www.baaqmd.gov/about-air-quality/interactive-data-maps>

North American Industry Classification System code

North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. This code represents the primary operation of your business, NOT the primary device permitted by BAAQMD.

Below are common NAICS codes:

811121	Automotive Body, Paint, and Interior Repair and Maintenance
812320	Dry Cleaning and Laundry Services (except Coin-Operated)
447110	Gas dispensing facility with Convenience Stores
447190	Gas dispensing facility without Convenience Stores

Still need help?

Call the Engineering Division at (415) 749-4990.

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT****Application Cover Form - "P-101B form"**

All fields are required unless otherwise noted. Please type or print.
No information provided on this form can be marked trade secret.

Send to:
BAAQMD
Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105
Email: permits@baaqmd.gov

Phone: (415) 749-4990

7. Accelerated Permitting (optional): The Accelerated Permitting Program entitles you to install and operate qualifying sources of air pollution and abatement equipment **while your permit application is being processed**. To qualify for this program, you must certify that your project will meet all of the following criteria. Please acknowledge each item by checking each box.

- ☐ Uncontrolled emissions of any single pollutant are each less than 10 lbs/highest day, or the equipment has been pre-certified by the BAAQMD.
- ☐ Uncontrolled emissions of toxic compounds do not exceed the trigger levels identified in Table 2-5-1 (see Regulation 2, Rule 5).
- ☐ The source is not a diesel engine.
- ☐ The project is not subject to public notice requirements (the source is either more than 1000 ft. from the nearest school, or the source does not emit any toxic compound in Table 2-5-1 of BAAQMD Regulation 2, Rule 5).
- ☐ For replacement of abatement equipment, the new equipment must have an equal or greater overall abatement efficiency for all pollutants than the equipment being replaced.
- ☐ For alterations of existing sources, the requested change does not result in an increase in emissions for all pollutants.
- ☐ Payment of all applicable permit application fees (the minimum permit fee to install and operate each source). See Regulation 3 or contact the Engineering Division for help in determining your fees.

8. CEQA Please answer the following questions pertaining to CEQA (California Environmental Quality Act).

- A Has another public agency prepared, required preparation of, or issued a notice regarding preparation of a California Environmental Quality Act (CEQA) document (initial study, negative declaration, environmental impact report, or other CEQA document) that analyzes impacts of this project or another project of which it is a part or to which it is related? If no, go to section 8B. Describe the document or notice, preparer, and date of document or expected date of completion:

The emergency generators are part of a Battery Energy Storage Project that is being processed through the California Energy Commission's AB 205 Process and they will serve as the lead agency for the CEQA documentation.

- B List and describe any other permits or agency approvals required for this project by city, regional, state or federal agencies

- C List and describe all other prior or current projects for which either of the following statements is true: (1) the project that is the subject of this application could not be undertaken without the project listed below, (2) the project listed below could not be undertaken without the project that is the subject of this application:

Pontentia Viridi Energy Storage Project

9. Trade Secret Information: Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to the public, unless you have asked BAAQMD to treat certain items as trade secret as specified in Regulation 2, Rule 1, Section 402.7.

Does this application contain Trade Secret information? ☐ Yes ☒ No

- ☐ Each page containing trade secret information must be labeled "trade secret" with the trade secret information clearly marked and you must provide a "public copy" with the information redacted.
- ☐ For each item asserted to be trade secret, you must provide a statement which provides the basis for your claim.

10. Certification/Signature

I hereby certify that I am authorized to complete this form for the facility and that all information contained herein is true and correct.

I acknowledge that all documentation in this application submittal is a matter of public record unless otherwise indicated per Section 9 of this form.

Name	Title	
Nicholas Lorenzen	Air Resource Specialist	
Signature	Date (mm/dd/yy)	Phone (xxx-xxx-xxxx)
	1/3/2025	805-308-8517

An electronic version of this form and instructions can be found at www.baaqmd.gov.

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT****Application Cover Form – "P-101B form"**

All fields are required unless otherwise noted. Please type or print.
No information provided on this form can be marked trade secret.

Send to:
BAAQMD
Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105
Email: permits@baaqmd.gov

Phone: (415) 749-4990

1. Facility and Project Information

- If this facility does not have a current BAAQMD permit or active permit application (new facility), fill out the **Facility Creation and Contacts Form** part of this form.
- If this application is in response to a Notice of Violation from BAAQMD Compliance & Enforcement Division, please enter the NOV number here

Facility Name	Facility ID (except new facilities)
Potentia Viridi Energy Storage Facility	
Application Title/ Project or Equipment Description	
Two Emergency Generators	
Equipment/Project Location in relation to facility location (e.g., NW corner of facility OR 338 Washington Dr.) (Optional)	
Center of Facility in Laydown Yard.	

2. Application Contact

First Name	Last Name		
Nicholas	Lorenzen		
Business Name of Contact (If different from facility)		Contact Title	
Dudek		Air Resource Specialist	
Address Line 1		Address Line 2 (Optional)	
3760 State Street		Suite 101	
City	State	Zip Code	
Santa Barbara	CA	93101	
E-mail Address			
nlorenzen@dudek.com			
Primary Phone (xxx-xxx-xxxx)	Alternate Phone (Optional)		Fax Number (Optional)
805 308 8517			

3. Proximity to a School (K-12)

Is the equipment/project located within 1,000 ft of the outer boundary of the nearest school? ☐ Yes ☒ No

4. Additional Information: The following additional information is required to complete all permit applications and should be included with your submittal. Failure to provide this information may delay the review of your application.

- ☒ A facility map with street address or location and the property boundary, drawn roughly to scale, that locates the equipment and its emission points, completed data form(s), and a pollutant flow diagram for each piece of equipment. (See www.baaqmd.gov/forms/permits)
- ☒ Equipment/project description, manufacturer's data
- ☒ Discussion and/or calculations of air pollutant emissions from the equipment

5. Small Business Certification (optional): If the facility identified in Part 1 qualifies as a small business as defined in Regulation 3, certify by checking boxes that your business meets all the following criteria. You may qualify for an application fee reduction.

- ☐ The business does not employ more than 10 persons and its gross annual income does not exceed \$750,000.
- ☐ And the business is not an affiliate of a non-small business. (Note: a non-small business employs more than 10 persons and/or its gross income exceeds \$750,000.)

6. Green Business Certification (optional): If the facility identified in Part 1 has been certified as a Green Business by the Association of Bay Area Governments and implemented by participating counties, check the box & include your documentation. You may qualify for an application fee reduction.

- ☐ Green Business certificate included

An electronic version of this form and instructions can be found at www.baaqmd.gov.



Instructions: Application Cover Form – “P-101B” and “Facility Creation Form and Contacts”

Introduction

Use the following instructions to guide you through the **Application Cover Form – P-101B and Facility Creation and Contacts Form** and in assembling an application packet.

Failure to submit the minimum forms in the format specified will result in the return of all submitted material.

The minimum submittal requirements to create an application with BAAQMD are:

Minimum Requirements

1. Application Cover Form: P-101B
2. Facility Creation Form (For first time permittees only) and Facility Contacts Form (For first time permittees, but can be used to update contacts for existing facilities with permits – See Next Sections)
3. Cover letter on company letterhead describing the project
4. At least one (1) Data Form or a Permit Condition Change Request form
5. If the application contains Trade Secret information, submit the documents specified under Trade Secret section of this form.

Electronic submittals (preferred):

- Attachments must be PDF files only.
- Email plus attachments is limited to under 35 MB in size.

Paper submissions:

- No staples
- Two (2) copies of all data forms must be provided
- Paper size limited to 11"x17" size

Other Forms

Forms you may want to include in your application:

- HRA Form – Health Risk Assessments
- Form APPENDIX H- CEQA Information
- Permit Condition Change Request Form
- **Data Forms-** Source Information (if applicable)
 - Form A- Abatement Device
 - Form C- General Combustion Device
 - Form G- General Source
 - Form ICE: Internal Combustion Engines
 - Form S: Coating & Solvent Sources
 - Form T: Tank Devices
 - Form P: Emission Point
 - Boiler Registration form

Trade Secret information

If your application has extensive areas marked Trade Secret, this may delay the acceptance of your application.

To claim information as Trade Secret, please provide the following:

1. Rationale for each Trade Secret claim per the Government Code 6254.7
2. A “Trade Secret” Copy identifying the item
3. A “Public Copy” containing the redactions of the trade secret information

Where to Send?

Email your application materials to permits@baaqmd.gov or mail to:

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Engineering Division
375 Beale St., Suite 600
San Francisco, CA 94105

Still need help?

Call the Engineering Division at (415) 749-4990 or email permits@baaqmd.gov

From: [Nicholas Lorenzen](#)
To: [Ronelle Candia](#)
Subject: RE: AN722261, FID203846 Potentia Viridi Energy Storage Facility
Date: Tuesday, January 21, 2025 2:41:58 PM
Attachments: [image001.png](#)

From: Isis O. Virrueta <ivirrueta@baaqmd.gov>
Sent: Tuesday, January 7, 2025 11:09 AM
To: Nicholas Lorenzen <nlorenzen@dudek.com>
Subject: AN722261, FID203846 Potentia Viridi Energy Storage Facility

Dear Nicholas L.,

My name is Isis Virrueta, I will be evaluating the project in the subject line.

After my initial review I have deemed the application:

Incomplete for Fees and Data

Incomplete for Fees

Incomplete for Data

Find the incompleteness letter and invoice attached.

Please send back the complete data in a single email or email threads.

Based on preliminary information the project:

Triggers a refined Health Risk Assessment: *Inconclusive/Yes/No*

Triggers the Public Notice Requirements: *Inconclusive /Yes/No*

It is located within an Overburdened Community: *Inconclusive /Yes/No*

This loop is the preferred way of communication, feel free to add your internal staff to this email to keep them posted.

Allow up to 72 hours for correspondence to be addressed. Otherwise, please follow up with a High Importance Tag.

Currently, the average review takes 6-12 months to be approved. If there is any sensitive deadline for this project, please let me know.

Please reach out to me with any further questions.

Sincerely,

Isis O. Virrueta

[Air Quality Engineer II \(she/her\)](#)

[Bay Area Air Quality Management District](#)

[Engineering Division](#)

375 Beale Street, Suite 600
San Francisco, CA 94105
ivirrueta@baaqmd.gov | www.baaqmd.gov





BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

ATTN: Nicholas Lorenzen

January 7, 2025

Application No.: 722261
Plant No.: 203846
Equipment Location: 17257 Patterson Pass Road,
Tracy, CA 95377

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION AND FEES

Dear Applicant:

Your application for an Authority to Construct and/or Permit to Operate the following equipment:

S-1 Emergency Standby Diesel Generator (900 bhp)
S-1 Emergency Standby Diesel Generator (900 bhp)
A-1 Selective Catalytic Reduction System
A-2 Selective Catalytic Reduction System

Has been assigned the above application number and is currently incomplete.

In order to complete our evaluation, we need the following information/clarifications:

1. Please provide a filled-out Appendix H Form and any other documents issued by the CEQA Review lead agency (NOD, EIR, etc.) Are the generators included in the project for CEQA purposes?
2. Are the generators identical? Will they have separate abatement devices? Do they share an exhaust?
3. Please provide a separate HRA Form for each generator if the generators are not shared.
4. Please provide the EPA Family for the engines (EPA Certificate).
5. Is there any diesel tank associated with the generator? If yes, please provide the specifications. Some diesel tanks (per Regulation 2-1) are exempt from the Authority to Construct/Permit to Operate requirements, therefore depending on the size, further information may be required.
6. Is there a DPF included as aftertreatment? Please provide the specifications.
7. Provide the SCR specifications (make/model).
8. Forms can be found here: <https://www.baaqmd.gov/en/forms/permits>
9. Please submit payment for the attached invoice.

Depending on the responses to the above information requests, the invoice may be adjusted. If the invoice is modified, a revised invoice will be sent out. Your payment options are the following:

a. Follow the link below and put in the invoice # and the last four digits of your customer number. There will be a fee applied.

<https://myaironline.baaqmd.gov/account/findPayInvoice>

b. If you wish to pay by check, send it to the address in the invoice and mark the envelope Attention: Finance.

Please submit the requested information and your fees within 90 days, or the application will be canceled.

Depending on the responses to the above information requests, the District may have more questions and reserves the right to ask them at the appropriate time. Please provide all responses in a single file or email.

Let me know if you have any questions.

Sincerely,

Isis Virrueta
Isis Virrueta
Air Quality Engineer

