

**AIR QUALITY  
MANAGEMENT DISTRICT****AUTHORITY TO CONSTRUCT EVALUATION**

**APPLICATION NO.:** A/C 25330  
**REVIEW STARTING DATE:** 09/06/17  
**ISSUING ENGINEER:** Jagdeep Khinda

**I. PROJECT DESCRIPTION:**

**FACILITY NAME:** AT&T MOBILITY

**LOCATION:** 1931 Arena Blvd, Sacramento, CA, 95834

**PROPOSAL:** Authority to Construct and Permit to Operate a diesel-fired emergency standby generator.

**INTRODUCTION:** AT&T MOBILITY is a wireless service provider. AT&T MOBILITY is seeking an Authority to Construct and a Permit to Operate a diesel fired emergency standby generator which will be installed at the location mentioned above.

**EQUIPMENT DESCRIPTION:** Emergency standby engine.

Make: Generac  
Model: SD050  
Serial No.: TBD  
Engine HP: 86 BHP  
Fuel Type: Diesel  
Displacement: 207.48 in<sup>3</sup>  
Engine Family: HKMCL3.41D43-001  
Model Year: 2017

**PROCESS RATE/FUEL USAGE:**

Equipment	Diesel Fuel Usage		
	Gallons/Hour (A)	Gallons/Day	Gallons/Quarter
Generac SD050 86 HP Engine	4.3	103.2	860

(A) Based on full standby load operation and using submitted Manufacturer Data.

**OPERATING SCHEDULE:** This application is for a standby emergency engine. For purposes of establishing the applicable BACT determination and for ensuring compliance with the ATCM for Stationary Compression Ignition Engines (Title 17, CCR, §93115), engine operation will be limited to 50 hours per year for maintenance and 24 hours per day, 200 hours per quarter and 200 hours per year for total use (maintenance and actual emergency operation). Twenty four hours a day is reasonable because it is an emergency engine and may in fact operate 24 hours per day.

**CONTROL EQUIPMENT EVALUATION:** The engine is certified to Tier 3 non-road emission standards.

## II. EMISSIONS CALCULATIONS:

1. **HISTORIC POTENTIAL EMISSIONS:** The equipment is being evaluated as a new emission unit; therefore its Historic Potential Emissions are as follows (Rule 202, §225):

HISTORIC POTENTIAL EMISSIONS		
Pollutant	Daily Historic Potential Emissions	Quarterly Historic Potential Emissions
VOC	0 lb/day	0 lb/qtr
NOx	0 lb/day	0 lb/qtr
SOx	0 lb/day	0 lb/qtr
PM10	0 lb/day	0 lb/qtr
PM2.5	0 lb/day	0 lb/qtr
CO	0 lb/day	0 lb/qtr

2. **PROPOSED POTENTIAL TO EMIT:** This application is for a standby emergency engine. During emergency episodes it can operate for up to 24 hr/day and for a maximum of 200 hours in a quarter or year, including both maintenance and emergency. Therefore, its Potential to Emit will be calculated assuming the engine operates (i) 24 hours per day, (ii) 200 hours per calendar quarter, and (iii) 200 hours per year. Refer to Appendix A – Emissions Calculations.

Emissions are calculated using the following equation:

$$PTE = \frac{EF * HP * Hrs}{U_{CF}}$$

Where

PTE = Potential to Emit (lb/day, lb/qtr, lb/yr)

EF = Emission Factor (g/hp-hr)

HP = Horse Power of engine

Hrs = Maximum hours of operation (hrs/day, hrs/qtr, hrs/yr)

$U_{CF}$  = Unit conversion factor (453.6 g/lb)

Pollutant	Emission Factors (A) (g/hp-hr)	Potential to Emit (B)		
		lb/day	lb/quarter	lb/year
VOC (C)	1.14	5.2	43	43
NOx (C)	3.0	13.7	114	114
SOx	0.005	0.0	0	0
PM10	0.17	0.8	6	6
PM2.5	0.17	0.8	6	6
CO	3.7	16.8	140	140
GHG	519	1.2 tons/day	10 tons/qtr	10 tons/qtr
Lead	N/A	N/A	N/A	N/A

- (A) Emission factors for VOC and NOx are based on the District's BACT standards (Tier 3 standard). CO emission factor is based on the certified level for a Tier 3 engine. PM10 and PM2.5 emission factors include both the condensable portion and the filterable portion of the particulates. The filterable portion is based on the ATCM standard and the condensable portion is derived using the condensable to filterable fraction, taken from AP-42, Table 3.4-2 (10/96), multiplied by the certification standard  $((0.15 \text{ g/hp-hr} + 0.15 \text{ g/hp-hr} * 0.0077/0.0496) = 0.17 \text{ g/hp-hr})$ . SOx emission factor is based on AP-42, Table 3.3-1 (10/96) using a fuel sulfur content of 15 ppm. GHG emission factor is expressed as CO2e and is from EPA's Mandatory Reporting of Greenhouse Gases Rule (78 FR 71948, Nov. 29, 2013), Tables C-1 & C-2.
- (B) Emissions are based on 86 BHP, 24 hours/day, 200 hours/quarter and 200 hours/year of operation. All emission limits are in English units.
- (C) The engine is required to comply with the combined NOx + VOC emission standard. For the purpose of calculating NOx and VOC individually, VOC emissions are assessed at the worst case scenario of the uncontrolled AP-42 emission factor of 1.14 g/bhp-hr and NOx emissions are assessed at the worst case limit of 3.0 g/bhp-hr.

### III. COMPLIANCE WITH RULES AND REGULATIONS:

**1. H&S § 42301.6 (AB 3205) COMPLIANCE:** The proposed project is located within 1,000 feet of the outer boundary of one K-12 school: Natomas Christian School (1921 Arena Blvd, Sacramento, CA, 95834). Furthermore, in accordance with CH&S §42301.6(b), a survey of additional schools located within a quarter mile was performed but none were identified. Therefore, the public noticing requirement of AB 3205 [CH&S §42301.6] applies to the proposed project. To comply with this requirement, a Public Notice shall be distributed to the parents or guardians of students attending Natomas Christian School and to all residents and businesses located within 1,000 feet of the source. A thirty-day comment period will be required prior to issuance of an Authority to Construct. Refer to Appendix D – Public Notice.

#### 2. NSR COMPLIANCE:

##### Rule 202 – New Source Review

##### Section 301 – Best Available Control Technology

BACT is triggered for any pollutant for which the emission increase ( $BACT_{EI}$ ) calculated pursuant to Rule 202, Section 411.1 exceeds the levels specified below. For purposes of this calculation, the difference is done using tenths, then the difference is rounded to an integer using standard rounding convention (round up if greater than or equal to 0.5):

BACT is triggered if:

$$BACT_{EI} > BACT_{TL}$$

Where:

$BACT_{EI}$  = Emissions Increase = (DPE – DHPE)  
DPE = Daily Potential Emissions (from Section II.2)  
DHPE = Daily Historic Potential Emissions (from Section II.1)

$BACT_{TL}$  = Pollutant  $BACT_{TL}$   
VOC 0 lb/day  
NOx 0 lb/day  
SOx 0 lb/day  
CO 550 lb/day  
PM<sub>10</sub> 0 lb/day  
PM<sub>2.5</sub> 0 lb/day  
Lead 3.3 lb/day

Determination of BACT Applicability:

Pollutant	DPE (lb/day)	DHPE	$BACT_{EI}$ (lb/day)	$BACT_{TL}$ (lb/day)	Is BACT Required?
VOC	5.2	0	5	>0	Yes
NOx	13.7	0	14	>0	Yes
SOx	0.02	0	0	>0	No
PM10	0.8	0	1	>0	Yes
PM2.5	0.8	0	1	>0	Yes
CO	16.8	0	17	>550	No
Lead	0	0	0	>3.3	No

The proposed NOx, VOC, PM10, and PM2.5 emissions exceed the BACT trigger levels specified in this section and are therefore subject to BACT.

SMAQMD's BACT Determination for standby IC engines with a rating of greater or equal to 50 BHP (see Appendix C – BACT Determination No. **116**) was last reviewed on **02/11/16**. Since less than two years have passed since the time the of the last BACT review and the time the application was deemed complete, and the SMAQMD is not aware of any significant changes to BACT requirements for engines in this size category, this BACT determination will be considered current and valid for this permit application.

Determination of Compliance with BACT Requirements:

<b>BACT Compliance</b>		
Pollutant	District BACT Standard BACT No. <b>116</b> (g/hp-hr)	Manufacturer's Emissions Data (A) (g/hp-hr)
VOC + NOx (C)	3.0	2.78
SOx	0.005 Fuel with < 0.0015% sulfur content by weight	Not applicable, This engine does not trigger BACT
PM10 (B)	0.15	0.11
PM2.5 (B)	0.15	0.11
CO	3.7	2.61

- (A) Based on Generac Exhaust Emission Data Sheet: SD050. The District does not use manufacturer's data as BACT because the data is for an engine family and it is not engine specific and does not account for degradation, variability and other factors.
- (B) Based on filterable PM only.
- (C) For purposes of VOC and NOx compliance the District uses the VOC+NOx certification standard for standby engines.

The manufacturer's emissions data for the Generac SD050 diesel engine for VOC, NOx, SOx, PM10, and PM2.5 demonstrate compliance with the BACT standards. The permit will require that the owner/operator only use fuel that contains less than 0.0015% sulfur by weight (CARB Diesel Fuel), which meets the BACT standard for SOx.

Section 302 – Offsets Emergency electrical generating, flood control, and firefighting equipment are exempt from the requirement to provide emission offsets by Section 110 provided the following conditions are met:

1. The installation of the equipment will not result in a major modification or be a major stationary source, in and of itself, and
2. Operation for maintenance purposes is limited to 100 hours per year (engine will be limited to 50 hours per year for T-BACT compliance), and such maintenance must be scheduled in cooperation with the District so as to limit air quality impact, and
3. Operation of the equipment must be limited to a total of 200 hours per year, and
4. The equipment is not used to supply power to a serving utility for distribution on the grid, and
5. Operation is limited to maintenance operation, emergency operation to supply power when there is an actual interruption of electrical power from the serving utility or emergency water pumping for flood control, firefighting, potable water pumping, or sewage pumping.

Conditions will be placed on the Authority to Construct and Permit to Operate indicating these limitations.

The following are the permitted emission units at the Stationary Source and the criteria pollutant quarterly permitted emissions:

All units at this facility/stationary source were installed after January 1, 1977.

**STATIONARY SOURCE POTENTIAL TO EMIT FOR VOC AND NO<sub>x</sub> (SAME FOR ALL 4 QUARTERS)**

Permit No.	Emissions Unit	Stationary Source Potential to Emit (lb/quarter)	
		VOC	NO <sub>x</sub>
A/C 25330	IC Engine Standby (86 BHP)	43	114
Total		43	114
Offset Trigger Level		≥5,000	≥5,000

**STATIONARY SOURCE POTENTIAL TO EMIT FOR SO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, AND CO (SAME FOR ALL 4 QUARTERS)**

Permit No.	Emissions Unit	Stationary Source Cumulative Emission Increase Since 01-01-77			
		(ton/year)	(lb/quarter)		
		PM <sub>2.5</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO
A/C 25330	IC Engine Standby (86 BHP)	0.003	0	6	140
Total		0.003	0	6	140
Offset Trigger Level		≥ 15	≥ 13,650	≥ 7,300	≥ 49,500

Section 308 – CEQA The California Environmental Quality Act (CEQA) is a statute that requires state and local agencies to identify the significant adverse environmental impacts of their actions and to avoid or mitigate those impacts to the extent feasible. The first step in the review of projects subject to CEQA is to determine if the project is exempt from CEQA.

The State CEQA Guidelines (SCG) provides that, “Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” (SCG §15061(b)(3)) Based on the environmental analysis below staff have concluded that the project is exempt from CEQA because there is no possibility that the project will have a significant adverse effect on the environment.

As shown in the table below, the project's operational phase emissions, or permitted emission limits are well below the SMAQMD Thresholds of Significance.

Pollutant/Hazard		Threshold	Project Total (D)	Rounded Project Total (B)	Less than Standard?
NOx (ozone precursor)		65 lb/day	0.6 lb/day	1 lb/day	Yes
VOC (ozone precursor)		65 lb/day	0.2 lb/day	0 lb/day	Yes
PM10 (A)	Daily	82 lb/day	0.0 lb/day	0 lb/day	Yes
	Annual	15 tons/year	0.0008 tons/year	0 tons/year	Yes
PM2.5 (A)	Daily	80 lb/day	0.0 lb/day	0 lb/day	Yes
	Annual	14.6 tons/year	0.0008 tons/year	0 tons/year	Yes
Cancer Risk (per million)		10	1.7 (C)	2 (C)	Yes
Acute Non-Cancer Health Hazard		1.0	N/A (C)	N/A (C)	N/A
Chronic Non-Cancer Health Hazard		1.0	0.00015 (C)	0 (C)	Yes
GHG as CO2e	Operational Phase	10,000 metric tons/year	2.23 metric tons/year	2 metric tons/year	Yes

- (A) Operational phase CEQA significance threshold for PM10 and PM2.5 is zero (0) for projects that fail to apply all feasible BACT. The thresholds for projects that apply all feasible BACT is 82 lb/day and 15 ton/year for PM10 and 80 lb/day and 14.6 ton/year for PM2.5.
- (B) The District uses conventional rounding methods to determine what numbers round to zero. For BACT purposes the District has determined that an emissions level of 0.49 lb/day rounds to 0. Using this same methodology, the emissions from this operation are rounded to 0 lb PM10, PM2.5/day and 0 ton PM10, PM2.5/year.
- (C) See Health Risk Assessment analysis under Rule 402 in Sec. 3. Prohibitory Rule Compliance.
- (D) For emergency equipment, operational phase emissions are based on predictable maintenance operation and do not include unforeseen emergency episodes. Typical daily maintenance hours on emergency engines are one hour/day.

In addition to the exemption from CEQA for a project that demonstrates no possibility of a significant effect on the environment, CEQA review is also exempt for permitting actions that are considered ministerial. Under the District "Guidance Document, Permit Actions and CEQA Applicability," section 5.1.1(f), issuance of an ATC is considered ministerial unless it requires the establishment of a new BACT standard. This project does not require a new BACT standard but rather relied on an existing BACT standard published in the District's BACT Clearinghouse (No. 116), thus making the permitting action ministerial and exempt from CEQA.

Therefore, upon approval of the project, the SMAQMD will issue the Authority to Construct and file a Notice of Exemption with the Sacramento County Clerk. The notice will be posted for 35 days and the evaluation and Authority to Construct will be made available for public inspection.

Section 406 – Submittal of BACT Determinations: This permit action relied on an existing BACT determination already published on SMAQMD's BACT Clearinghouse. Therefore, this section does not apply.

**Rule 203 – Prevention of Significant Deterioration**

A source or modification triggers PSD if:

- Its potential to emit any one pollutant is greater than or equal to 100 tons/year if it is one of the 28 selected industrial categories in 42 U.S.C. Section 7479 (1), or greater than or equal to 250 tons/year for all other categories; or
- It is part of a major stationary source and the project's net emissions increase for any pollutant will be greater than the significance levels listed below:

Pollutant	Level of Significance (Tons/Yr)
CO	100
NOx	40
SOx	40
PM	25
PM10	15
PM2.5	10 (PM2.5) or 40 (SO <sub>2</sub> ) or 40(NO)
Ozone	40 of NOx or VOCs
Lead	0.6
Fluorides	3
Sulfuric acid mist	7
H <sub>2</sub> S	10
Total reduced sulfur (including H <sub>2</sub> S)	10
Reduced sulfur compounds (including H <sub>2</sub> S)	10
Greenhouse Gases (CO <sub>2</sub> e)	75,000

There are no emissions sources at the facility that appear to have the potential to emit over 100 or 250 tons per year, and as demonstrated in Section II.2, the emissions from this engine are so low they would not cause the facility to exceed the threshold when analyzed cumulatively. Since this is not a major source, it is not necessary to consider the major modification significance levels, but nonetheless, Section II.2 indicates that annual emissions are well below the levels of significance.

**Rule 214 – Federal New Source Review**

This rule does not apply because this permit action is not for a new major stationary source or a modification at an existing major stationary source.



**Rule 217 – Public Notice Requirements for Permits**

Sections 401-402 – CARB, EPA, and Public Notification: The public noticing requirements of Rule 217 do not apply if:

- Offsets are not required under Rule 202, Section 302.
- A visibility analysis is not required under Rule 214, Section 413.
- The increase in potential to emit for the project, calculated under Section 403 of Rule 217, is below the following limits:

Pollutant	lb/qtr
VOC	5,000
NOx	5,000
SOx	9,200
PM10	7,300
PM2.5	10 TPY
CO	49,500

Analysis:

- As determined in Section III.2, offsets are not required.
- This permit action is not subject to Rule 214, so the visibility analysis required by Section 413 of Rule 214 is inapplicable.
- As shown below, the increase in potential to emit does not exceed the notification exemption thresholds.

Increase in Potential to Emit					
Pollutant	Potential to Emit for the Project		Increase in PTE	Notification Threshold	Notification Required?
	Pre-Application	Post-Application			
VOC	0	43 lb/qtr	43 lb/qtr	≥ 5,000	No
NOx	0	114 lb/qtr	114 lb/qtr	≥ 5,000	No
SOx	0	0 lb/qtr	0 lb/qtr	≥ 9,200	No
PM10	0	6 lb/qtr	6 lb/qtr	≥ 7,300	No
PM2.5	0	0.003 TPY	0.0 TPY	≥ 10 TPY	No
CO	0	140 lb/qtr	140 lb/qtr	≥ 49,500	No

**3. PROHIBITORY RULE COMPLIANCE:**

**Rule 401 – Ringelmann Chart**

The permit will include conditions requiring that the IC engine comply with the Ringelmann No. 1 or 20% opacity standard and in the District's experience, properly maintained engines are able to meet the requirement. The equipment will be inspected prior to the issuance of the permit to operate and on a regular basis thereafter to ensure continuous compliance.

## Rule 402 – Nuisance

The District regulates emissions of toxics substances for engines under Rule 402, SMAQMD's guidance document, Health Risk Management Programs For Existing, Modified and New Stationary Sources (March 24, 2016) and ATCM's adopted by CARB.

The health risk action levels and results are summarized below:

Health Risk Action Levels and Assessment Summary					
Type of Health Risk	Permitting Thresholds <sup>(A)</sup>		Project HRA Results <sup>(B)</sup>		
	T-BACT	Maximum	Residential	Worker	School (C)
Cancer Risk (Chances per Million)	≥ 1.0	10.0	1.7	0.8	0.1
Acute Non-Cancer (Hazard Index)	≥ 1.0	1.0	N/A	N/A	N/A
Chronic Non-Cancer (Hazard Index)	≥ 1.0	1.0	1.5E-04	6.5E-04	8.1E-05

(A) In certain circumstances, the District may allow a health risk in excess of the levels specified here. For more information, see SMAQMD's guidance document, Health Risk Management Programs for Existing, Modified and New Stationary Sources (2016).

(B) Results have been rounded to one decimal place.

(C) Since the engine will be restricted from operating for maintenance purposes while school is in session, risk from engine operation to the school children is not evaluated and is assumed to be zero. The potential risk depicted here was calculated for a worker that might potentially be on site after school is in session when the engine is allowed to operate for maintenance purposes.

Diesel particulate matter (PM) has been identified as a carcinogen by the Office of Environmental Health Hazard Assessment (OEHHA).

The following factors, formulas, and assumptions were taken into consideration in order to estimate the worst case excess cancer risk and the non-cancer health risks for the toxic pollutants emitted (summary of all the maximum concentrations for various receptors can be found in Appendix B – Health Risk Assessment).

The project's emissions are modeled with the use of an EPA approved air dispersion model to determine the concentrations of toxic pollutants at residential and non-residential receptors surrounding the project. The model used for this analysis is Lakes Environmental's AERMOD View, Version 8.8.9. The following parameters were used as inputs to the model for each engine:

Release Height:	7.25 feet
Gas Exit Temperature:	1044 °F
Stack Diameter:	2.5 in.
Gas Exit Flow Rate:	448 acfm
Nominal Emission Rate:	1.0 g/s

SMAQMD utilizes the California Air Resources Board's Hotspots Analysis and Reporting Program (HARP2), Version 16088 model which incorporates the health risk assessment methodologies from the "Risk Assessment Guidelines - Guidance Manual for Preparation of Health Risk Assessments" (February 2015).

## CANCER RISK ASSESSMENT:

From equation 5.4.1.1 and 8.2.4 A:

$$\text{Riskair} = \text{Cair} * (\text{BR}/\text{BW}) * \text{A} * \text{EF} * \text{CPF} * \text{ED}/\text{AT} * (1\text{E}-06) * (\text{GLC}) * \text{ASF} * \text{FAH}$$

Where:

Riskair	= Cancer risk from inhalation exposure
Cair	= Concentration ( $\mu\text{g}/\text{m}^3$ )
(BR/BW)	= Breathing Rate/Body Weight = 361 (l/kg-day) 95%, 3 <sup>rd</sup> Trimester = 1090 (l/kg-day) 95%, 0<2 yrs = 631 (l/kg-day) 80%, 2<9 yrs = 572 (l/kg-day) 80%, 2<16 yrs = 261 (l/kg-day) 80%, 16<30 yrs = 233 (l/kg-day) 80%, 16<70 yrs = 230 (l/kg-day) 8 hr worker rate
A	= Inhalation Absorption Factor (default = 1)
EF	= Exposure Frequency = 350 days for Residential = 245 days for Non-Residential
CPF	= Cancer Potency Factor (kg-day/mg)
ED	= Exposure Duration = 30 years for Residential = 25 years for Non-Residential (worker and school) Note: since the engine is restricted from operating for maintenance purposes during school hours, students would not be exposed to engine operation but school workers potentially would; therefore, the school was evaluated under a non-residential exposure duration.
AT	= Averaging Time = 25,550 days
ASF	= Age sensitivity factor for a specified age group
FAH	= Fraction of time spent at home (use 1 for children under 16 when a school is within a 1 in a million cancer risk isopleth) = 0.85, 3 <sup>rd</sup> Trimester = 0.85, 0<2 yrs = 0.72, 2<9 yrs = 0.72, 2<16 yrs = 0.73, 16<30 yrs = 0.73, 16<70 yrs
(1E-06)	= ( $\text{mg}/1000 \text{ ug}$ )*( $\text{m}^3/1000 \text{ l}$ )
GLC	= Ground Level Adjustment Factor = 1.0 for resident = 4.2 (7/5 x 24/8) for worker for equipment that, although limited, operates during normal work hours

**NON-CANCER RISK ASSESSMENT:** The chronic non-cancer health risk is determined for a given pollutant by dividing the pollutant's annual average ambient air concentration ( $\mu\text{g}/\text{m}^3$ ) by the chronic reference exposure level of that pollutant in order to obtain the chronic hazard index (HI). The acute non-cancer health risk is determined by dividing the pollutant's maximum hourly ambient air concentration ( $\mu\text{g}/\text{m}^3$ ) by the acute reference exposure level in order to obtain the acute hazard index (HI). In addition, each contaminant can affect different organs of the body and several compounds may affect common organs. Therefore, when there are multiple toxic compounds involved, the effects are additive for the common organs.

A list of chronic or acutely hazardous air contaminants may be found at the OEHHA website [www.oehha.ca.gov](http://www.oehha.ca.gov). The method of calculating the HI numbers (Risk Assessment Guidelines) is also found at this website.

**HRA CONCLUSION:** The health risk for this project is considered acceptable to the SMAQMD because:

- The evaluated cancer risk for a maximum exposed individual resident (MEIR) is 1.7 in one million, which is below the significant risk threshold. However, since the cancer risk exceeds 1 in one million, T-BACT will be required. The engine complies with T-BACT requirements of SMAQMD with the installation of a Tier 3 engine with a Diesel PM emission factor below 0.15 g/bhp-hr.
- The evaluated cancer risk for a maximum exposed individual worker (MEIW) is 0.8 in one million, which is below the significant risk threshold.
- The evaluated cancer risk for a maximum exposed school individual (MEIS) is 0.1 in one million, which is below the significant risk threshold.
- The evaluated noncancer Acute Hazard Index is less than one for the maximum exposed individual resident (MEIR) and the maximum exposed individual worker (MEIW).
- The evaluated noncancer Chronic Hazard Index is less than one for the maximum exposed individual resident (MEIR) and the maximum exposed individual worker (MEIW).

#### **Rule 406 - Specific Contaminants**

The proposed equipment is not expected to exceed the emissions limit of 0.2% by volume sulfur compound as  $\text{SO}_2$  and 0.1 gr/dscf for combustion contaminants calculated to 12%  $\text{CO}_2$ .

Diesel Fuel F-Factor	=	9190 dscf/mmBTU
Molar Volume	=	385.3 ft <sup>3</sup> /mol
Diesel HHV	=	19,300 BTU/lb
Conversion Factor	=	15.432 gr/g
PM10 Emission Factor	=	0.17 g/hp-hr
$\text{SO}_2$ Emission Factor	=	0.005 g/hp-hr
BSFC	=	7000 BTU/hp-hr
Weight % C in Diesel	=	87 % or 0.87 lb C/lb fuel
C to $\text{CO}_2$ Conversion Efficiency	=	0.99

#### **PM10 Concentration** (combustion contaminants):

- A. Calculate uncorrected grain loading  
=  $(0.17 \text{ g/hp-hr}) \times (15.432 \text{ gr/g}) \times (\text{hp-hr}/7000 \text{ BTU}) \times (1\text{E}6 \text{ BTU/mmBTU}) \times (\text{mmBTU}/9190 \text{ dscf})$

$$= 0.04078097 \text{ gr/dscf}$$

- B. Calculate CO<sub>2</sub> emission factor (lb CO<sub>2</sub>/mmbtu) assuming 100% C to CO<sub>2</sub> conversion  
$$= (0.87 \text{ lb C/lb fuel}) \times (\text{mol C}/12 \text{ lb C}) \times (\text{mol CO}_2/\text{mol C}) \times (44 \text{ lb CO}_2/\text{mol CO}_2) \times (\text{lb fuel}/19300 \text{ BTU}) \times (1\text{E}6 \text{ BTU}/\text{mmBTU})$$
$$= 165.2849741 \text{ lb CO}_2/\text{mmBTU}$$
- C. Calculate lb CO<sub>2</sub>/mmBTU at 99% Conversion  
$$= 165.2849741 \text{ lb CO}_2/\text{mmBTU} \times 99\%$$
$$= 163.6321244 \text{ lb CO}_2/\text{mmBTU}$$
- D. Calculate volume % of CO<sub>2</sub> in Exhaust Gas  
$$= \% \text{ CO}_2$$
$$= \text{mol CO}_2/\text{mol exhaust}$$
$$= (163.6321244 \text{ lb CO}_2/\text{mmBTU}) \times (\text{mol CO}_2/44 \text{ lb CO}_2) \times (\text{mmBTU}/9190 \text{ dscf}) \times (385.3 \text{ dscf}/\text{mol exhaust})$$
$$= 0.155919125 \text{ mol CO}_2/\text{mol exhaust or } 15.5919125 \% \text{ CO}_2$$
- E. Calculate corrected grain loading  
$$= (0.04078097 \text{ gr/dscf}) \times (12\% \text{ CO}_2/15.5919125\% \text{ CO}_2)$$
$$= 0.031 \text{ gr/dscf corrected to } 12\% \text{ CO}_2$$

#### **SO<sub>2</sub> Concentration (% SO<sub>2</sub> by volume):**

The following calculation is at 0% excess air which represents worst case.

$$= (0.005 \text{ g/hp-hr}) \times (\text{lb SO}_2/453.6 \text{ g}) \times (\text{hp-hr}/7000 \text{ BTU}) \times (1\text{E}6 \text{ BTU}/\text{mmBTU}) \times (\text{mmBTU}/9190 \text{ dscf})$$
$$\times (\text{mol SO}_2/64 \text{ lb SO}_2) \times (385.3 \text{ dscf}/\text{mol exhaust})$$
$$= 0.000001032 \text{ mol SO}_2/\text{mol exhaust or } 0.0001032 \% \text{ SO}_2$$

The rule emission limits for SO<sub>2</sub> and PM are 0.2% SO<sub>2</sub> by volume and 0.1 grains/cf at 12% CO<sub>2</sub>, respectively. Therefore, the emissions from the engine comply with Rule 406.

#### **Rule 420 - Sulfur Content of Fuels**

This rule limits the sulfur content of fuel. It was last amended in 1981, and CARB has subsequently adopted more stringent standards, which limit the sulfur content of diesel no. 2 motor fuel @ <0.0015%S. The permit will include conditions limiting the use of fuel to CARB-approved fuels or alternative fuels that comply with the CARB regulations, which will ensure compliance with this Rule.

#### **4. NSPS COMPLIANCE:**

The list of all adopted New Source Performance Standards as listed in 40 CFR 60 (<http://yosemite.epa.gov/r9/r9nsps.nsf/ViewStandards?ReadForm&Part=60>) were reviewed to determine if the proposed project is subject to one or more of these regulations. One applicable provision was identified:

SUBPART IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines are applicable to any of the following:

- A. Engines with a displacement of less than 30 liters per cylinder where the model year is 2007 or later for non-fire pump engines and the model year listed in Table 3 of this subpart for fire pump engines.
- B. Owners or operators of engines that commence construction after July 11, 2005 where the engine is manufactured after April 1, 2006 for a non-fire pump engine or for engines manufactured as a certified National Fire Protection Association (NFPA) fire pump after July 1, 2006.

- C. Owners and operators of engines that modify or reconstruct their engine after July 11, 2005.

The engine was manufactured in 2017 and has a displacement of less than 30 liters per cylinder, therefore, the engine is subject to subpart IIII.

NSPS requirements and Analysis:

- A. The engine must meet the non-road standard in Table 1 of 40 CFR 60.89.112 that is applicable to the engine size and year of manufacture. The engine meets this requirement because it has been certified to the tier 3 standard.
- B. The fuel used must meet the requirements specified in 40 CFR 80.510(b). The engine meets this requirement because the permit will be conditioned to limit fuels used to CARB diesel and CARB diesel complies with the federal fuel specification.
- C. The engine must have an hour meter installed. The permit will include a condition requiring an hour meter.
- D. This NSPS limits engine operation for maintenance purposes to 100 hours per year. The permit will include a condition limiting engine operation to 50 hours per year for maintenance purposes.

**5. NESHAP COMPLIANCE:**

NESHAPs under 40 CFR, Part 61: The list of all adopted National Emission Standards for Hazardous Air Pollutants (<http://yosemite.epa.gov/r9/r9nsps.nsf/ViewStandards?ReadForm&Part=61>) were reviewed to determine if the proposed project is subject to one or more of these regulations. There are currently no 40 CFR, Part 61 NESHAPs applicable to this source category.

NESHAPs under 40 CFR, Part 63: The District has not requested nor obtained delegation of Part 63 NESHAPs. However, these NESHAPS are being enforced as state Air Toxic Control Measures (ATCMs) pursuant to Health and Safety Code, Sections 39658(b) and 39666(d). The list of all adopted National Emission Standards for Hazardous Air Pollutants (<http://yosemite.epa.gov/r9/r9nsps.nsf/ViewStandards?ReadForm&Part=63>) were reviewed to determine if the proposed project is subject to one or more of these regulations. One applicable provision was identified:

Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at both major and area sources of HAP emissions.

The engine is subject to this part because it is considered a new RICE since construction will be commenced after June 12, 2006 at an area source.

The requirements of this NESHAP subpart require the engine to comply with the emission requirements specified in 40 CFR 60 Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines). As mentioned above this engine complies with these requirements because it is certified to the appropriate standard, will utilize CARB diesel, and will have an hour meter installed.

- 6. ATCM COMPLIANCE:** The list of all adopted Airborne Toxic Control Measures (<http://www.arb.ca.gov/toxics/atcm/atcm.htm>) was reviewed to determine if the proposed project is subject to one or more of these regulations.

Airborne Toxic Control Measure For Stationary Compression Ignition Engines (Title 17, CCR Sections 93115-93115.15): The engine is stationary, greater than 50 hp, utilizes a compression ignition power cycle, and is therefore subject to this rule. To comply with this rule, the permit will contain conditions requiring that the engine meet a PM emission rate of 0.15 g/hp-hr or less, limit other criteria pollutants to EPA Tier 3 levels, operate no more than 50 maintenance hours per year and 200 total hours per year, monitor usage with a non-resetting 4 digit totalizer, and operate with CARB verified diesel fuel. The operator will be required to maintain monthly records that document operating hours and fuel deliveries.

**IV. RECOMMENDATION:** This IC engine will comply with all applicable District rules and regulations. An authority to construct a diesel fired emergency standby engine generator should be issued to AT&T MOBILITY with the following conditions.

***Refer to conditions in Authority to Construct No. A/C 25330***

REVIEWED BY: Brian J. Kuhl DATE: 10-3-17

APPROVED BY: James DeLuz DATE: 10/4/17

# Appendix A

## Emission Calculations



AC: 25330

	EF(g/hp)	HP	hr/day	hr/quarter	hr/year	g/lb	DAY Emit	QTR Emit	Year Emit
VOC	1.14	86	24	200	200	453.59	5.2	43	43
NOx	3	86	24	200	200	453.59	13.7	114	114
NOx+VOC	3	86	24	200	200	453.59	13.7	114	114
SOx	0.005	86	24	200	200	453.59	0.0	0	0
PM10	0.17	86	24	200	200	453.59	0.8	6	6
PM2.5	0.17	86	24	200	200	453.59	0.8	6	6
PM10 <sub>Filt.</sub>	0.15	86	24	200	200	453.59	0.7	6	6
PM2.5 <sub>Filt.</sub>	0.15	86	24	200	200	453.59	0.7	6	6
CO	3.7	86	24	200	200	453.59	16.8	140	140

PTE Maintenance

AC: 25330

	EF(g/hp)	HP	hr/day	hr/quarter	hr/year	g/lb	DAY Emit	QTR Emit	Year Emit
VOC	1.14	86	1	50	50	453.59	0.2	10.8	10.8
NOx	3	86	1	50	50	453.59	0.6	28.4	28.4
NOx+VOC	3	86	1	50	50	453.59	0.6	28.4	28.4
SOx	0.005	86	1	50	50	453.59	0.0	0.0	0.0
PM10	0.17	86	1	50	50	453.59	0.032	1.612	1.612
PM2.5	0.17	86	1	50	50	453.59	0.032	1.612	1.612
PM10 <sub>Filt.</sub>	0.15	86	1	50	50	453.59	0.028	1.422	1.422
PM2.5 <sub>Filt.</sub>	0.15	86	1	50	50	453.59	0.028	1.422	1.422
CO	3.7	86	1	50	50	453.59	0.7	35.1	35.1

## **Emission Calculations for Greenhouse Gases**

GHG Emission Calculations for Permit Number:

**25330**

**Step 1.**

Select a Fuel from the pull-down menu:

**Diesel**

**Step 2.**

Enter Fuel Consumption in (select from the pull-down menu):

**hp-hr**

**Step 3.**

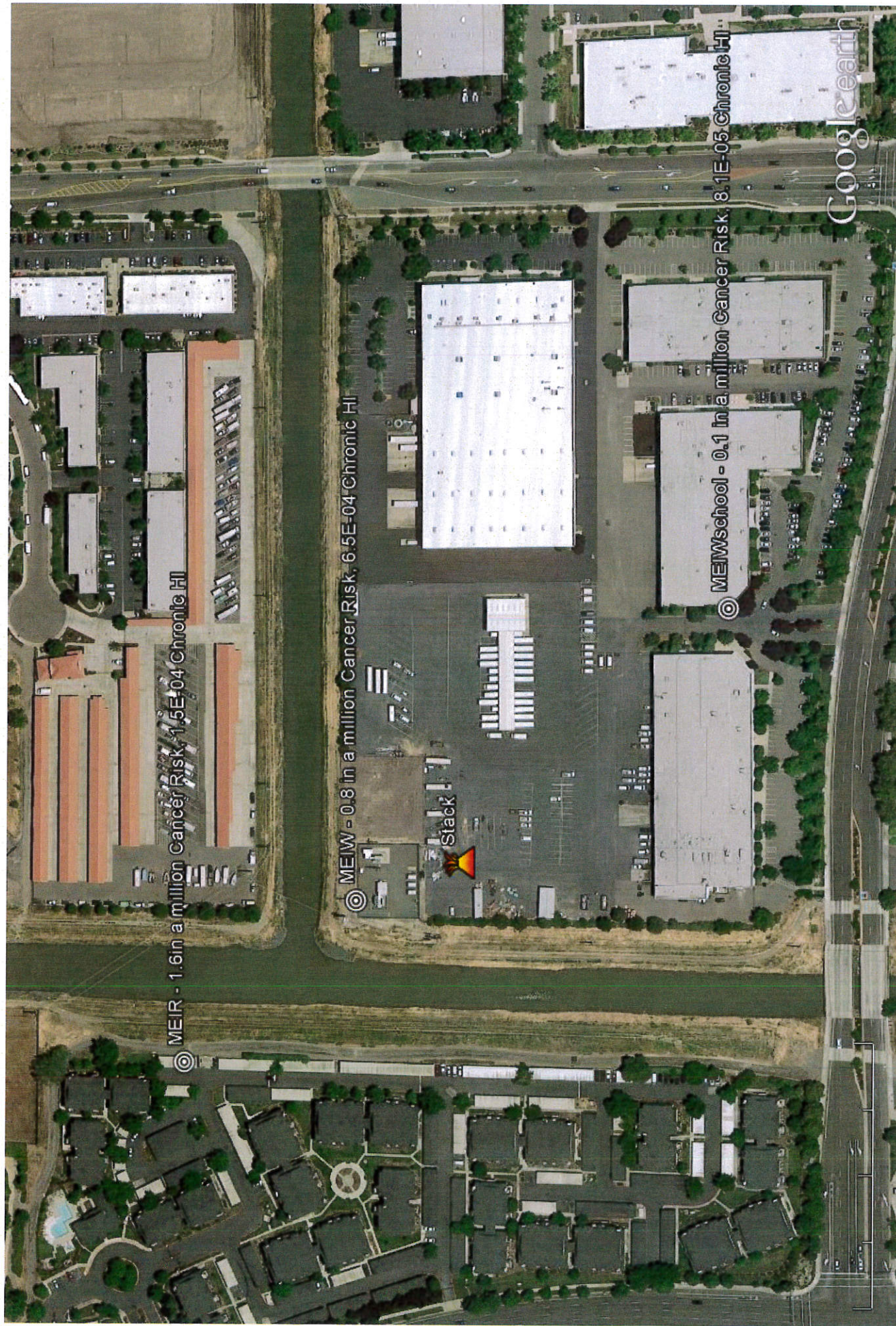
Enter the total hp-hr for the engine (hp x hrs)

Potential to Emit for CO2e			
Period	Fuel Usage (hp-hr)	CO2e Emissions (in short tons)	Units
Daily	2064	1.2	tons/day
1st Qtr	17,200	10	tons/quarter
2nd Qtr	17,200	10	tons/quarter
3rd Qtr	17,200	10	tons/quarter
4th Qtr	17,200	10	tons/quarter
Annual	17,200	10	tons/year

# **Appendix B**

## **Health Risk Assessment**





Google earth

feet  
meters

1000  
300





**A/C 25330 - IC ENGINE, STANDBY**

	POLASREV	InhalationCancerUF	InhalationCancerSlopeFactor	OralCancerSlopeFactor	AcuteREL	InhalationChronicREL	OralChronicREL
POL					#N/A	5	#N/A
9901	DieselExpMI	0.0003	1.1	#N/A	#N/A		

## MAXIMALLY EXPOSED INDIVIDUAL WORKER - SCHOOL [MEIW]

**CANCER RISK - SCENARIO: 25YrCancerDerived**

\*HARP - HRAcalc v17023 9/29/2017 3:52:36 PM - Cancer Risk - Input File: L:\SSD FOLDERS\Modelling\25000-25499\25330\25330school\hra\25330school\HRA\input.hra

[illegible]

**NONCANCER HAZARD INDEX - SCENARIO: NonCancerChronicDerived**

[illegible]

REC	X	Y	POLID	CNC:	CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	HAZARD INDEX BY TARGET ORGAN			
85	630093.74	4278716.88	9901	0.000409333	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.07E-05	0.00E+00	0.00E+00	BONE/TEETH	ENDO	BLOOD	ODOR
															0.00E+00	0.00E+00	0.00E+00
															0.00E+00	0.00E+00	0.00E+00

## NONCANCER HAZARD INDEX - SCENARIO: NonCancerAcute

\*HARP - HRACalc v17023 9/29/2017 3:52:36 PM - Acute Risk - Input File: I:\SSD FOLDERS\Modeling\25000-25499\25330\25330school\HRAInput.bra

[illegible][illegible]

POL	POLABREV	InhalationCancerJRF	InhalationCancerSlopeFactor	OralCancerSlopeFactor	AcuteREL	InhalationChronicREL	OralChronicREL
9901	DieselExpPM	0.0003	1.1	#N/A	#N/A	5	#N/A

**CANCER RISK - SCENARIO: 30YrCancerDerived**

\*HARP - HRACalc v17023 9/29/2017 3:46:58 PM - Cancer Risk - Input File: L:\SSD FOLDERS\Modelling\25000-25499\25330res\bra\25330resHRA\input bra

REC	X	Y	POUND	CONC	PATHWAY BREAKDOWN										DRIVER		RISK TOTAL		
					INH	SOIL	DERMAL	MMILK	WATER	FISH	CROP	BEEF	DAIRY	PIG	CHICKEN	EGG		1ST_DRIVER	2ND_DRIVER
120	629667.75	4278976.89	9901	0.0007514	1.68E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	NA	NA	1.68E-06

\*HARP - HRACalc v17023 9/29/2017 3:46:58 PM - Chronic Risk - Input File: L:\SSD FOLDERS\Modelling\25000-25499\25330\25330res\HRA\input.bia

[illegible]

REC	X	Y	POLID	CONC	HAZARD INDEX BY TARGET ORGAN													
					CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEI	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD	ODOR	GENERAL
120	629867.75	4278976.89	9901	0.0007514	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.50E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	

\*HARP - HRACalc v17023 9/29/2017 3:46:58 PM - Acute Risk - Input File: L:\SSD FOLDERS\Modelling\25000-25499\25330-res\bra\25330-resHRA\harp.it bra

[illegible][illegible]

**CANCER RISK - SCENARIO: 25YrCancerDerived**

\*HARP - HRACalc v17023 9/29/2017 3:53:44 PM - Cancer Risk - Input File: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330nonres\hra\25330nonres\HRACalc\hra

REC	X	Y	POLID	CONC	PATHWAY BREAKDOWN										DRIVER		RISK TOTAL			
					INH	SOIL	DERMAL	MMILK	WATER	FISH	CROP	BEEF	DAIRY	PIG	CHICKEN	EGG		1ST_DRIVER	2ND_DRIVER	
321	629949.13	4778892.77	9901	0.00325199	8.39E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	NA	NA	8.39E-07

\*HARP - HRAcalc v17023 9/29/2017 3:53:44 PM - Chronic Risk - Input File: I:\SSD EOL\ERS\Modell\hw\2500n-2549n\2533n\25380-nonce\harp\25380-nonce\HRAInput.hwp

[illegible]

REC	X	Y	POLID	CONC	HAZARD INDEX BY TARGET ORGAN													
					CV	CNS	IMMUN	KIDNEY	GILV	REPRO/DEVEL	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD	ODOR	GENERAL
321	629949.13	4278892.77	9901	0.00325199	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.50E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	

HARP - HRCalc v17023 9/29/2017 3:53:44 PM - Acute Risk - Inout File: I:\SSD EOL\ERS\Modelling\25000-25499\25330\monrac\brs\25330\monrac\HARP\inout.bm

[illegible][illegible]

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\*\* AERMOD Input Produced by:

\*\* AERMOD View Ver. 9.2.0

\*\* Lakes Environmental Software Inc.

\*\* Date: 9/8/2017

\*\* File: L:\SSD FOLDERS\Modeling\25000-25499\25330\Input Report.inp

\*\*

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\*\* AERMOD Control Pathway

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CO STARTING

TITLEONE L:\SSD FOLDERS\Modeling\25000-25499\25330\25330.isc

MODELOPT DFAULT CONC

AVERTIME 1 PERIOD

URBANOPT 466488

POLLUTID OTHER

RUNORNOT RUN

ERRORFIL 25330.err

CO FINISHED

\*\*

\*\*\*\*\*

\*\* AERMOD Source Pathway

\*\*\*\*\*

\*\*

\*\*

SO STARTING

\*\* Source Location \*\*

\*\* Source ID - Type - X Coord. - Y Coord. \*\*

LOCATION STCK1	POINT	629970.000	4278836.000	2.440
----------------	-------	------------	-------------	-------

\*\* Source Parameters \*\*

SRCPARAM STCK1	1.0	2.210	835.372	66.76292	0.063
----------------	-----	-------	---------	----------	-------

\*\* Building Downwash \*\*

BUILDHGT STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDHGT STCK1	3.81	3.81	0.00	0.00	0.00	0.00
BUILDHGT STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDHGT STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDHGT STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDHGT STCK1	0.00	0.00	0.00	0.00	0.00	0.00

BUILDWID STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDWID STCK1	8.38	6.11	0.00	0.00	0.00	0.00
BUILDWID STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDWID STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDWID STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDWID STCK1	0.00	0.00	0.00	0.00	0.00	0.00

BUILDLIN STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDLIN STCK1	14.86	14.89	0.00	0.00	0.00	0.00
BUILDLIN STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDLIN STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDLIN STCK1	0.00	0.00	0.00	0.00	0.00	0.00
BUILDLIN STCK1	0.00	0.00	0.00	0.00	0.00	0.00



XBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
XBADJ	STCK1	-29.63	-30.04	0.00	0.00	0.00	0.00
XBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
XBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
XBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
XBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
YBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
YBADJ	STCK1	4.17	0.25	0.00	0.00	0.00	0.00
YBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
YBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
YBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00
YBADJ	STCK1	0.00	0.00	0.00	0.00	0.00	0.00

URBANSRC ALL

SRCGROUP ALL

SO FINISHED

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\*\* AERMOD Receptor Pathway

\*\*\*\*\*

\*\*

\*\*

RE STARTING

INCLUDED 25330.rou

RE FINISHED

\*\*

\*\*\*\*\*

\*\* AERMOD Meteorology Pathway

\*\*\*\*\*

\*\*

\*\*

ME STARTING

\*\* Surface File Path: L:\SSD FOLDERS\Modeling\25000-25499\25330\...\Permitting\4  
- Modeling and HRA\Dispersion Modeling\Met Data\AermodMet 14134\Not 1 Minute Met  
Data\International\10-14\

SURFFILE "...Permitting\4 - Modeling and HRA\Dispersion Modeling\Met  
Data\AermodMet 14134\Not 1 Minute Met Data\International\10-14\Int 10-14 N1MD.SFC"

\*\* Profile File Path: L:\SSD FOLDERS\Modeling\25000-25499\25330\...\Permitting\4  
- Modeling and HRA\Dispersion Modeling\Met Data\AermodMet 14134\Not 1 Minute Met  
Data\International\10-14\

PROFFILE "...Permitting\4 - Modeling and HRA\Dispersion Modeling\Met  
Data\AermodMet 14134\Not 1 Minute Met Data\International\10-14\Int 10-14 N1MD.PFL"

SURFDATA 93225 2010

UAIRDATA 23230 2010 OAKLAND/WSO\_AP

PROFBASE 8.0 METERS

ME FINISHED

\*\*

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\*\* AERMOD Output Pathway

\*\*\*\*\*

\*\*

\*\*

OU STARTING

RECTABLE ALLAVE 1ST

RECTABLE 1 1ST

\*\* Auto-Generated Plotfiles

PLOTFILE 1 ALL 1ST "L:\SSD FOLDERS\Modeling\25000-  
25499\25330\25330.AD\01H1GALL.PLT" 31

PLOTFILE PERIOD ALL "L:\SSD FOLDERS\Modeling\25000-  
25499\25330\25330.AD\PE00GALL.PLT" 32

SUMMFILE "L:\SSD FOLDERS\Modeling\25000-25499\25330\25330.sum"  
OU FINISHED

\*\*

\*\*\*\*\*

\*\* Project Parameters

\*\*\*\*\*

\*\* PROJCTN CoordinateSystemUTM

\*\* DESCPTN UTM: Universal Transverse Mercator

\*\* DATUM World Geodetic System 1984

\*\* DTMRGN Global Definition

\*\* UNITS m

\*\* ZONE 10

\*\* ZONEINX 0

\*\*

HARP2 - HRACalc (dated 17023) 9/29/2017 3:46:58 PM - Output Log

GLCs loaded successfully  
Pollutants loaded successfully  
Pathway receptors loaded successfully

\*\*\*\*\*

RISK SCENARIO SETTINGS

Receptor Type: Resident  
Scenario: All  
Calculation Method: HighEnd

\*\*\*\*\*

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: False  
Dermal: False  
Mother's milk: False  
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\*\*

NOTE: The worker adjustment factors below are only used for cancer assessments. However, the GLC adjustment factor is also applied to 8-hr noncancer chronic assessments.

Worker adjustments factors enabled: YES

GLC adjustment factor: 4.2

Exposure frequency: 245

\*\*Fraction at time at home\*\*

3rd Trimester to 16 years: OFF

16 years to 70 years: OFF

\*\*\*\*\*

TIER 2 SETTINGS

Tier2 not used.

\*\*\*\*\*

Calculating cancer risk

Cancer risk breakdown by pollutant and receptor saved to: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330res\hra\25330resCancerRisk.csv

Cancer risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330res\hra\25330resCancerRiskSumByRec.csv

Calculating chronic risk

Chronic risk breakdown by pollutant and receptor saved to: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330res\hra\25330resNCChronicRisk.csv

Chronic risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330res\hra\25330resNCChronicRiskSumByRec.csv

Calculating acute risk

Acute risk breakdown by pollutant and receptor saved to: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330res\hra\25330resNCAcuteRisk.csv

Acute risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330res\hra\25330resNCAcuteRiskSumByRec.csv

HRA ran successfully

\*\*\*PROJECT INFORMATION\*\*\*

HARP Version: 17023  
 Project Name: 25330res  
 Project Output Directory: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330res  
 HARP Database: NA

\*\*\*FACILITY INFORMATION\*\*\*

Origin  
 X (m):0  
 Y (m):0  
 Zone:1  
 No. of Sources:0  
 No. of Buildings:0

\*\*\*EMISSION INVENTORY\*\*\*

No. of Pollutants:1  
 No. of Background Pollutants:0

Emissions	Scrid	Skid	PolID	PolID	PolAbbrev	Multi (lbs/yr)	Annual Ems (lbs/hr)	MaxHr Ems	MWAF
-----------	-------	------	-------	-------	-----------	-------------------	------------------------	-----------	------

STCK1	0	0	9901	DieselExhPM	1	1.422	0.028	1	
-------	---	---	------	-------------	---	-------	-------	---	--

Background	PolID	PolAbbrev	Conc (ug/m^3)	MWAF
------------	-------	-----------	---------------	------

Ground level concentration files (g/c)

9901MAXHR.txt  
 9901PER.txt

\*\*\*POLLUTANT HEALTH INFORMATION\*\*\*

Health Database: C:\Harp2\Tables\HEALTH1.mdb  
 Health Table Version: HEALTH16088  
 Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL	InhChronicREL	OralChronicREL	InhChronic8HRREL
-------	-----------	-----------	------------	----------	---------------	----------------	------------------

9901	DieselExhPM	1.1		5			
------	-------------	-----	--	---	--	--	--

\*\*\*AIR DISPERSION MODELING INFORMATION\*\*\*

All executables were obtained from USEPA's Support Center for Regulatory Atmospheric Modeling website (<http://www.epa.gov/scram001/>)

AERMOD: 15181  
 AERMAP: 11103  
 BPIPRM: 04274  
 AERPLT: 13329

\*\*\*METEOROLOGICAL INFORMATION\*\*\*

Version:  
 Surface File:  
 Profile File:  
 Surface Station:  
 Upper Station:  
 On-Site Station:

\*\*\*LIST OF AIR DISPERSION FILES\*\*\*

AERMOD Input File:  
AERMOD Output File:  
AERMOD Error File:  
Profile list

---

\*\*\*LIST OF RISK ASSESSMENT FILES\*\*\*

Health risk analysis files (.hrai)

25330resCancerRisk.csv  
25330resCancerRiskSumByRec.csv  
25330resGLCList.csv  
25330resHRAInput.hra  
25330resNCAcuteRisk.csv  
25330resNCAcuteRiskSumByRec.csv  
25330resNCChronicRisk.csv  
25330resNCChronicRiskSumByRec.csv  
25330resOutput.txt  
25330resPathwayRec.csv  
25330resPoIDB.csv

Spatial averaging files (.lsa)

---

HARP2 - HRACalc (dated 17023) 9/29/2017 3:53:44 PM - Output Log

GLCs loaded successfully  
Pollutants loaded successfully  
Pathway receptors loaded successfully  
\*\*\*\*\*

#### RISK SCENARIO SETTINGS

Receptor Type: Worker  
Scenario: All  
Calculation Method: HighEnd

\*\*\*\*\*  
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: 16  
Total Exposure Duration: 25

Exposure Duration Bin Distribution  
3rd Trimester Bin: 0  
0<2 Years Bin: 0  
2<9 Years Bin: 0  
2<16 Years Bin: 0  
16<30 Years Bin: 0  
16 to 70 Years Bin: 25

\*\*\*\*\*  
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: False  
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\*\*

NOTE: The worker adjustment factors below are only used for cancer assessments. However, the GLC adjustment factor is also applied to 8-hr noncancer chronic assessments.

Worker adjustments factors enabled: YES

GLC adjustment factor: 4.2

Exposure frequency: 245

\*\*Fraction at time at home\*\*

3rd Trimester to 16 years: OFF

16 years to 70 years: OFF

\*\*\*\*\*

#### SOIL & DERMAL PATHWAY SETTINGS

Deposition rate (m/s): 0.05

Soil mixing depth (m): 0.01

Dermal climate: Mixed

\*\*\*\*\*

#### TIER 2 SETTINGS

Tier2 not used.

\*\*\*\*\*

Calculating cancer risk

Cancer risk breakdown by pollutant and receptor saved to: L:\SSD

FOLDERS\Modeling\25000-

25499\25330\25330nonres\hra\25330nonresCancerRisk.csv

Cancer risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-

25499\25330\25330nonres\hra\25330nonresCancerRiskSumByRec.csv

Calculating chronic risk

Chronic risk breakdown by pollutant and receptor saved to: L:\SSD

FOLDERS\Modeling\25000-

25499\25330\25330nonres\hra\25330nonresNCChronicRisk.csv

Chronic risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-

25499\25330\25330nonres\hra\25330nonresNCChronicRiskSumByRec.csv

Calculating acute risk

Acute risk breakdown by pollutant and receptor saved to: L:\SSD

FOLDERS\Modeling\25000-

25499\25330\25330nonres\hra\25330nonresNCAcuteRisk.csv

Acute risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-

25499\25330\25330nonres\hra\25330nonresNCAcuteRiskSumByRec.csv

HRA ran successfully



HARP Project Summary Report 10/3/2017 8:54:15 AM

\*\*\*PROJECT INFORMATION\*\*\*

HARP Version: 17023  
Project Name: 25330nonres  
Project Output Directory: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330nonres  
HARP Database: NA

\*\*\*FACILITY INFORMATION\*\*\*

Origin  
X (m):0  
Y (m):0  
Zone:1  
No. of Sources:0  
No. of Buildings:0

\*\*\*EMISSION INVENTORY\*\*\*

No. of Pollutants:1  
No. of Background Pollutants:0

Emissions ScfID	StkID	PolID	PolID	PolID	Multi (lbs/yr)	Annual Ems (lbs/hr)	MaxHr Ems	MWAF
--------------------	-------	-------	-------	-------	-------------------	------------------------	-----------	------

STCK1	0	0	9901	DieselExhPM	1	1.422	0.028	1
-------	---	---	------	-------------	---	-------	-------	---

Background PolID	PolID	Conc (ug/m^3)	MWAF
---------------------	-------	---------------	------

Ground level concentration files (lgc1)

9901MAXHR.txt  
9901PER.txt

\*\*\*POLLUTANT HEALTH INFORMATION\*\*\*

Health Database: C:\Harp2\Tables\HEALTH1.mdb  
Health Table Version: HEALTH16088  
Official: True

PolID	PolID	InhCancer	OralCancer	AcuteREL	InhChronicREL	OralChronicREL	InhChronic8HRREL
-------	-------	-----------	------------	----------	---------------	----------------	------------------

9901	DieselExhPM	1.1		5			
------	-------------	-----	--	---	--	--	--

\*\*\*AIR DISPERSION MODELING INFORMATION\*\*\*

All executables were obtained from USEPA's Support Center for Regulatory Atmospheric Modeling website (<http://www.epa.gov/scram001/>)  
AERMOD: 15181  
AERMAP: 11103  
BPIPFRM: 04274  
AERPLOT: 13329

\*\*\*METEOROLOGICAL INFORMATION\*\*\*

Version:  
Surface File:  
Profile File:  
Surface Station:  
Upper Station:  
On-Site Station:

\*\*\*LIST OF AIR DISPERSION FILES\*\*\*

AERMOD Input File:

AERMOD Output File:

AERMOD Error File:

Plotfile list

\*\*\*LIST OF RISK ASSESSMENT FILES\*\*\*

Health risk analysis files (hra)

25330nonresCancerRisk.csv

25330nonresCancerRiskSumByRec.csv

25330nonresGLCList.csv

25330nonresHRAInput.hra

25330nonresNCAcuteRisk.csv

25330nonresNCAcuteRiskSumByRec.csv

25330nonresNCCChronicRisk.csv

25330nonresNCCChronicRiskSumByRec.csv

25330nonresOutput.txt

25330nonresPathwayRec.csv

25330nonresPolDB.csv

Spatial averaging files (sa)

HARP2 - HRACalc (dated 17023) 9/29/2017 3:52:36 PM - Output Log

GLCs loaded successfully  
Pollutants loaded successfully  
Pathway receptors loaded successfully  
\*\*\*\*\*

RISK SCENARIO SETTINGS

Receptor Type: Worker  
Scenario: All  
Calculation Method: HighEnd

\*\*\*\*\*  
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: 16  
Total Exposure Duration: 25

Exposure Duration Bin Distribution  
3rd Trimester Bin: 0  
0<2 Years Bin: 0  
2<9 Years Bin: 0  
2<16 Years Bin: 0  
16<30 Years Bin: 0  
16 to 70 Years Bin: 25

\*\*\*\*\*  
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: False  
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\*\*

NOTE: The worker adjustment factors below are only used for cancer assessments. However, the GLC adjustment factor is also applied to 8-hr noncancer chronic assessments.

Worker adjustments factors enabled: YES

GLC adjustment factor: 4.2

Exposure frequency: 245

\*\*Fraction at time at home\*\*

3rd Trimester to 16 years: OFF

16 years to 70 years: OFF

\*\*\*\*\*

#### SOIL & DERMAL PATHWAY SETTINGS

Deposition rate (m/s): 0.05

Soil mixing depth (m): 0.01

Dermal climate: Mixed

\*\*\*\*\*

#### TIER 2 SETTINGS

Tier2 not used.

\*\*\*\*\*

Calculating cancer risk

Cancer risk breakdown by pollutant and receptor saved to: L:\SSD

FOLDERS\Modeling\25000-

25499\25330\25330school\hra\25330schoolCancerRisk.csv

Cancer risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-

25499\25330\25330school\hra\25330schoolCancerRiskSumByRec.csv

Calculating chronic risk

Chronic risk breakdown by pollutant and receptor saved to: L:\SSD

FOLDERS\Modeling\25000-

25499\25330\25330school\hra\25330schoolNCChronicRisk.csv

Chronic risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-

25499\25330\25330school\hra\25330schoolNCChronicRiskSumByRec.csv

Calculating acute risk

Acute risk breakdown by pollutant and receptor saved to: L:\SSD

FOLDERS\Modeling\25000-

25499\25330\25330school\hra\25330schoolNCAcuteRisk.csv

Acute risk total by receptor saved to: L:\SSD FOLDERS\Modeling\25000-

25499\25330\25330school\hra\25330schoolNCAcuteRiskSumByRec.csv

HRA ran successfully

\*\*\*PROJECT INFORMATION\*\*\*

HARP Version: 17023  
 Project Name: 25330school  
 Project Output Directory: L:\SSD FOLDERS\Modeling\25000-25499\25330\25330school  
 HARP Database: NA

\*\*\*FACILITY INFORMATION\*\*\*

Origin  
 X (m):0  
 Y (m):0  
 Zone:1  
 No. of Sources:0  
 No. of Buildings:0

\*\*\*EMISSION INVENTORY\*\*\*

No. of Pollutants:1  
 No. of Background Pollutants:0

Emissions		StkID	PolID	PolID	PolID	Multi (lbs/yr)	Annual Ems (lbs/hr)	MaxHr Ems	MWAF
STCK1	0	0	9901	DieselExhPM	1	1.422	0.028	1	

Background		PolID	PolID	Conc (ug/m^3)	MWAF
PolID	PolID	PolID	PolID	Conc (ug/m^3)	MWAF

Ground level concentration files (lg(c))

9901MAXHR.txt  
 9901PER.txt

\*\*\*POLLUTANT HEALTH INFORMATION\*\*\*

Health Database: C:\Harp2\Tables\HEALTH1.mdb  
 Health Table Version: HEALTH16088  
 Official: True

PolID	PolID	InhCancer	OralCancer	AcuteREL	InhChronicREL	OralChronicREL	InhChronic8HRREL
9901	DieselExhPM	1.1		5			

\*\*\*AIR DISPERSION MODELING INFORMATION\*\*\*

All executables were obtained from USEPA's Support Center for Regulatory Atmospheric Modeling website (<http://www.epa.gov/iscram001/>)

AERMOD: 15181  
 AERMAP: 11103  
 BPIPFRM: 04274  
 AERPLT: 13329

\*\*\*METEOROLOGICAL INFORMATION\*\*\*

Version:  
 Surface File:  
 Profile File:  
 Surface Station:  
 Upper Station:  
 On-Site Station:

\*\*\*LIST OF AIR DISPERSION FILES\*\*\*

AERMOD Input File:

AERMOD Output File:

AERMOD Error File:

Plotfile list

\*\*\*LIST OF RISK ASSESSMENT FILES\*\*\*

Health risk analysis files (hra)

25330schoolCancerRisk.csv

25330schoolCancerRiskSumByRec.csv

25330schoolGLCList.csv

25330schoolHRAInput.hra

25330schoolINCAcuteRisk.csv

25330schoolINCAcuteRiskSumByRec.csv

25330schoolINCCChronicRisk.csv

25330schoolINCCChronicRiskSumByRec.csv

25330schoolOutput.txt

25330schoolPathwayRec.csv

25330schoolPoIDB.csv

~\$330schoolOutput.txt

Spatial averaging files (lsa)

Appendix C  
BACT Determination No. **116**

CATEGORY:

**IC ENGINE COMPRESSION-STANDBY**

BACT Size: Minor Source BACT

IC ENGINE STANDBY

<b>BACT Determination Number:</b>	116	<b>BACT Determination Date:</b>	2/11/2016
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**Equipment Information**

**Permit Number:** 24758  
**Equipment Description:** IC ENGINE STANDBY  
**Unit Size/Rating/Capacity:** I.C. Engine, Standby, Diesel-fueled >=50 HP  
**Equipment Location:** PHILLIPS 66 COMPANY  
 76 BROADWAY  
 SACRAMENTO, CA

**BACT Determination Information**

<b>ROCs</b>	<b>Standard:</b>	Applicable NMHC + NOx Tier Standard
	<b>Technology Description:</b>	Applicable NMHC + NOx emission standard for horsepower range based on the ATCM for Stationary CI Engines
	<b>Basis:</b>	Achieved in Practice
<b>NOx</b>	<b>Standard:</b>	Applicable NMHC + NOx Tier Standard
	<b>Technology Description:</b>	Applicable NMHC + NOx emission standard for horsepower range based on the ATCM for Stationary CI Engines
	<b>Basis:</b>	Achieved in Practice
<b>SOx</b>	<b>Standard:</b>	CARB Diesel
	<b>Technology Description:</b>	Diesel fuel with a sulfur content no greater than 0.0015% by weight
	<b>Basis:</b>	Achieved in Practice
<b>PM10</b>	<b>Standard:</b>	Applicable PM Tier Standard
	<b>Technology Description:</b>	Applicable PM emission standard for horsepower range based on the ATCM for Stationary CI Engines
	<b>Basis:</b>	Achieved in Practice
<b>PM2.5</b>	<b>Standard:</b>	Applicable PM Tier Standard
	<b>Technology Description:</b>	Applicable PM emission standard for horsepower range based on the ATCM for Stationary CI Engines
	<b>Basis:</b>	Achieved in Practice
<b>CO</b>	<b>Standard:</b>	Applicable CO Tier Standard
	<b>Technology Description:</b>	Applicable CO emission standard for horsepower range based the ATCM for Stationary CI Engines
	<b>Basis:</b>	Achieved in Practice
<b>LEAD</b>	<b>Standard:</b>	
	<b>Technology Description:</b>	
	<b>Basis:</b>	

**Comments:** For emergency engines  $50 \leq \text{bhp} < 75$ , Tier 4 Interim certification is the requirement; for emergency engines  $75 \leq \text{bhp} < 750$ , Tier 3 certification is the requirement; for emergency engines  $\geq 750$  bhp, Tier 2 certification is the requirement.

**District Contact:** Isam Boulad      Phone No.: (916) 874 - 4859      email: [iboulad@airquality.org](mailto:iboulad@airquality.org)



# **Appendix D**

## **Public Notice**

# PUBLIC NOTICE

Alberto Ayala, Ph.D., M.S.E.  
AIR POLLUTION CONTROL OFFICER

**Date:** October 9, 2017

**To:** (1) Parents or guardians of children attending **Natomas Christian School, 1921 Arena Blvd., Sacramento, CA 95834.**  
(2) Addresses within a 1,000 foot radius of the proposed internal combustion (IC) engine located at **1931 Arena Blvd., Sacramento, CA 95834.**

**Subject:** Regarding the permit application from **AT&T Mobility**, to install a new IC engine driving an emergency use electrical generator that would emit diesel particulate matter, which is designated as a toxic air contaminant by the California Air Resources Board (CARB).

**Who is the SMAQMD?** The Sacramento Metropolitan Air Quality Management District (SMAQMD) is the local government agency that regulates stationary sources of air pollution such as manufacturing facilities, industrial sites, coating operations, gasoline stations and many others. The SMAQMD evaluates the air emissions from each project prior to approving a permit. SMAQMD's purpose is to ensure that the air emissions associated with a project meet all local, state and federal requirements in order to protect public health.

**Why are you Receiving this Notice?** State law <sup>(1)</sup> requires that prior to approving an Authority to Construct permit for a facility that 1) emits toxic air contaminants and 2) is located within 1,000 feet of a K-12 school site, the SMAQMD must notify the parents or guardians of children attending all schools within a quarter-mile radius and all addresses within a 1,000-foot radius of the facility. SMAQMD must allow for a 30-day public review and comment period before taking final action on the permit application.

**Background** SMAQMD has received an application from **AT&T Mobility** for an Authority to Construct permit for a diesel-fired emergency use electrical generator.

The location has been determined to be within 1,000 feet from the outer boundary of **Natomas Christian School**. CARB has identified the diesel particulates from diesel-fired engine exhaust as a toxic air contaminant.

**Proposed Project** **AT&T Mobility** proposes to install an emergency use electrical generator at **1931 Arena Blvd., Sacramento, CA 95834**. The electrical generator will operate 1) for maintenance & testing and 2) when utility electricity fails and can no longer support the equipment electrical load. The proposed electrical generator will be limited to operate 50 hours/year for maintenance and testing purposes and 200 hours/year combined for maintenance, testing and emergency use purposes. The electrical generator will not run for maintenance during school hours.

**Project Analysis** The SMAQMD analyzed the project for compliance with applicable air quality regulations. The analysis identified the amount and types of air emissions that are expected to be emitted from the proposed project and the effect of those air emissions on public health. The SMAQMD has determined that the health risk resulting from the toxic air contaminant emissions from the proposed project are within acceptable levels and that the project is expected to comply with all other local, state and federal air quality requirements.

<sup>(1)</sup> California Health and Safety Code section 42301.6

...continued on reverse

## PUBLIC NOTICE (continued)

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**Public  
Comment  
Period**

Written public comments will be accepted by SMAQMD for a 30-day period ending **November 8, 2017** at the following address:

Sacramento Metropolitan Air Quality Management District  
Attn: A/C 25330 – Michelle Joe  
777 12th Street 3rd Floor  
Sacramento, CA 95814-1908

The SMAQMD's engineering evaluation and proposed permit can be reviewed at <http://www.airquality.org/About-Us/News-Notices>. All comments received during this 30-day period that pertain to areas for which the SMAQMD has jurisdiction will be reviewed and considered by SMAQMD before a final decision is made on this application for an Authority to Construct permit. As required, SMAQMD will include written responses to the comments in the permit application file.

**Attachment NOE**  
**CEQA Notice of Exemption**

# Notice of Exemption

## Appendix E

**To:** Office of Planning and Research  
P.O. Box 3044, Room 113  
Sacramento, CA 95812-3044

County Clerk

County of: Sacramento

600 8th Street

Sacramento, CA 95814

**From: (Public Agency):** Sacramento Metropolitan AQMD  
777 12th Street, Suite 300  
Sacramento, CA 95814

(Address)

Project Title: IC Engine Compression- Standby (A/C 25330)

Project Applicant: AT&T Mobility, PO Box 5095, Room 4W200M, San Ramon, CA, 94583

Project Location - Specific:

1931 Arena Boulevard, Sacramento, CA, 95834

Project Location - City: Sacramento

Project Location - County: Sacramento

Description of Nature, Purpose and Beneficiaries of Project:

The project beneficiary, AT&T Mobility, is seeking an Authority to Construct and a Permit to Operate a diesel fired emergency standby generator. AT&T Mobility is a wholly owned subsidiary of AT&T that provides wireless services.

Name of Public Agency Approving Project: Sacramento Air Quality Management District

Name of Person or Agency Carrying Out Project: AT&T Mobility

Exempt Status: **(check one):**

- ☒ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☐ Categorical Exemption. State type and section number: \_\_\_\_\_
- ☒ Statutory Exemptions. State code number: Sec. 1506(b)(3)

Reasons why project is exempt:

SMAQMD determined there is no possibility that the project will have a significant adverse impact on the environment because its air pollutant emissions are within the Districts' acceptable limits and no other environmental medium is expected to be adversely affected. Also, this permitting action is covered under an existing BACT, therefore it is considered ministerial.

Lead Agency

Contact Person: Jorge DeGuzman

Area Code/Telephone/Extension: 916-874-4860

**If filed by applicant:**

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ☐ Yes ☐ No

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Title: Program Manager

☒ Signed by Lead Agency ☐ Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.  
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: \_\_\_\_\_