

# Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322 (360) 574-3058 • Fax: (360) 576-0925 www.swcleanair.org

May 4, 2012

Mr. Kevin Harding Hewlett Packard Company 1115 SE 164<sup>th</sup> Ave, STE 210 Vancouver, WA 98683

Subject:

Notification of Emergency Generator Installation

Dear Mr. Harding:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on March 19, 2012 for installation and operation of an emergency generator engine at 1115 SE 164<sup>th</sup> Ave, STE 210, Vancouver, WA. For administrative and tracking purposes SWCAA has assigned tracking number SUN-015 to this notification. This notification was filed in accordance with SWCAA 400-072 and applies to the installation of one emergency generator engine. The emergency generator engine was identified as:

(1) John Deere model 6090HF484 diesel fired engine, serial number RG6090L101102, with a capacity of 385 horsepower. The engine drives a 250 kW Kohler model 250REOZJE generator set.

SWCAA has completed a review of your notification and the associated support information and has determined that the notification meets the requirements of SWCAA 400-072(2). Once installed, affected equipment must maintain compliance with the requirements of SWCAA 400-072(4)(c) "Emergency service internal combustion engines". A copy of the relevant SWCAA 400-072 section is attached for your information.

Be advised that emission units installed pursuant to SWCAA 400-072 are subject to source registration and periodic inspection. Registration fees for this equipment will be invoiced consistent with SWCAA 400-100.

If you need further assistance or have any questions regarding these matters, please contact me at (360) 574-3058 extension 130.

Sincerely,

Paul T. Mairose Chief Engineer

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#### SWCAA 400-072 Emission Standards for Selected Small Source Categories

[Statutory Authority: Chapter 70.94.141 RCW. Original adoption 09-21-056 filed 10/15/09, effective 11/15/09.]

## (4) Source categories.

## (c) Emergency service internal combustion engines.

(i) **Applicability.** The provisions of this section apply to emergency service internal combustion engines with a rating of less than 1,000 horsepower (e.g., emergency generators, fire pumps, sewer lift stations, etc.).

#### (ii) Emission limits and standards.

(A) Visible emissions from diesel fired engine exhaust stacks shall not exceed ten percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See SWCAA 400, Appendix A). This limitation shall not apply during periods of cold start-up.

## (iii) General requirements.

- (A) Liquid fueled engines shall only be fired on #2 diesel or biodiesel. Fuel sulfur content of liquid fuels shall not exceed 0.0015% by weight (15 ppmw). A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.
- (B) Gaseous fueled engines shall only be fired on natural gas or propane.
- (C) Each compression ignition engine shall be EPA Tier certified and manufactured no earlier than January 1, 2008.
- (D) Engine operation shall be limited to maintenance checks, readiness testing, and actual emergency use.
- (E) Engine operation for maintenance checks and readiness testing shall not exceed 100 hours per year. Total engine operation shall not exceed 200 hours per year.
- (F) Each engine shall be equipped with a nonresettable hourmeter for the purpose of documenting hours of operation.
- (G) Engine exhaust shall be discharged vertically. Any device that obstructs or prevents vertical discharge is prohibited.
- (iv) Monitoring and recordkeeping requirements. The information listed below shall be recorded at the specified intervals, and maintained in a readily accessible form for a minimum of 3 years. With the exception of data logged by a computerized data acquisition system, each required record shall include the date and the name of the person making the record entry.
  - (A) Total hours of operation for each engine shall be recorded annually;
  - (B) Fuel sulfur certifications shall be recorded for each shipment of liquid fuel;
  - (C) Maintenance activities shall be recorded for each occurrence consistent with the provisions of 40 CFR 60.4214;
  - (D) Upset conditions that cause excess emissions shall be recorded for each occurrence; and
  - (E) All air quality related complaints received by the permittee and the results of any subsequent investigation or corrective action shall be recorded for each occurrence.

#### (v) **Testing requirements.** None.

# (vi) Reporting requirements.

- (A) All air quality related complaints received by the owner or operator shall be reported to SWCAA within three calendar days of receipt.
- (B) The owner or operator of an affected emergency engine shall report the following information to the Agency no later than March 15<sup>th</sup> for the preceding calendar year:
  - (I) Hours of engine operation; and
  - (II) Air emissions of criteria air pollutants, VOCs, and toxic air pollutants (TAPs).