



Southwest Clean Air Agency

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August 21, 2012

Ms. Helen Charneski
Camas School District 117
841 NE 22nd Ave.
Camas, WA 98607

Subject: Notification of Emergency Generator Installation

Dear Ms. Charneski:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on August 16, 2012 for installation and operation of an emergency generator engine at the new Woodburn Elementary School at 2400 NE Woodburn Dr., Camas, WA (SWCAA ID 242). For administrative and tracking purposes SWCAA has assigned tracking number SUN-025 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 4024HF285B diesel fired engine, with a capacity of 80 horsepower at 1,800 rpm. The engine drives a 50 kW Kohler model 50REOZJC 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



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 15th for the preceding calendar year:
 - (I) Hours of engine operation; and
 - (II) Air emissions of criteria air pollutants, VOCs, and toxic air pollutants (TAPs).