

Southwest Clean Air Agency

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January 9, 2015

Ms. Candee Collins Fresenius Medical Care 505 SE Adams Avenue Chehalis, Washington 98532

Subject:

Notification of Emergency Generator Engine Installation (SUN-073)

Dear Ms. Collins:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on December 2, 2014 for installation and operation of an emergency generator engine at the new Chehalis Kidney Center at 1684 Bishop Road, Chehalis, WA. For administrative and tracking purposes SWCAA has assigned tracking number SUN-073 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) 315 bhp diesel-fired John Deere model 6068HF485 engine to drive a 200 kW (standby) Kohler model 200REOZJF generator set. The engine is EPA Tier 3 certified.

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

Day & Marine

cc:

Jack Henson

Fresenius Medical Care

900 Circle 75 Parkway, Suite 1080

Atlanta, GA 30339

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).

Summary Information (by SWCAA) for SUN-073 Fresenius Medical Care - Chehalis Kidney Center **Emergency Generator**

A 200 kW diesel-fired emergency generator set will be installed at the Chehalis Kidney Center to provide emergency power to the facility when utility power is interrupted. The following equipment details were available:

Location: Chehalis Kidney Center

1684 Bishop Road, Chehalis, WA 98332

Engine Make / Model: John Deere / 6068HF485

Engine Serial Number: To be determined

Fuel: Diesel

Fuel Consumption: 15.3 gallons per hour at full standby load

EPA Tier 3

Horsepower Rating: 315 horsepower

Installation Date: Expected in early 2015

Engine Built (Date): To be determined **Engine Certification:**

Generator Set Make / Model: Kohler / 200REOZJF

Generator Set Output: 200 kW

Stack Description: ~4" diameter, 1,510 acfm at 980°F

Applicable Federal Regulations: 40 CFR 60 Subpart IIII

40 CFR 63 Subpart ZZZZ

<u>Chehalis Kidney Center Emergency Generator Engine.</u> Potential annual emissions from the combustion of ultra-low sulfur diesel (<0.0015% sulfur by weight) were calculated with the assumption that the equipment will operate at full load for up to 200 hours per year.

Chehalis Kidney C	enter Emerge	ncy Generat	or Engine			
Hours of Operation =		200 hours				
Power Output =		315 horsepower				
Diesel Density =		7.206 pounds per gallon				
Fuel Sulfur Content =		0.0015 % by weight				
Fuel Consumption Rate =		15.3 gal/hr				
Fuel Heat Content =		0.138 MMBtu/gal (for use with GHG factors from 40 CFR 98)				
]	Emission					
	Factor	Emissions	Emissions			
Pollutant	g/(hp-hr)	lb/hr	tpy	Emission Factor Source		
NO_X	2.41	1.68	0.17	95% of Manufacturer Te	st for HC + NO _X	
co	0.45	0.31	0.031	Manufacturer Test		
VOC	0.13	0.09	0.009	5% of Manufacturer Test	for HC + NO _X	
SO _X as SO ₂		0.0033	0.0003	Mass Balance		
PM	0.08	0.06	0.0056	Manufacturer Test		
PM ₁₀	0.08	0.06	0.0056	Manufacturer Test		
PM _{2.5}	0.08	0.06	0.0056	Manufacturer Test		
	<u> </u>		COse	COoe	Emission Factor	

			CO ₂ e	CO ₂ e		Emission Factor
Greenhouse Gases	kg/MMBtu	GWP	lb/MMBtu	lb/gallon	tpy, CO ₂ e	Source
CO_2	73.96	1	163.05	23	34	40 CFR 98
CH ₄	0.003	25	0.165	0.023	0.03	40 CFR 98
N ₂ O	0.0006	298	0.394	0.054	0.08	40 CFR 98
Total GHG - CO₂e	74.0		163.6	23	35	-