



## Southwest Clean Air Agency

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February 12, 2015

Mr. Clark Comerford  
Ritchie Bros. Auctioneers, Inc.  
214 Ritchie Lane  
Chehalis, WA 98532

Subject: Notification of Emergency Generator Engine Installation (SUN-078)

Dear Mr. Comerford:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on February 2, 2015 for installation and operation of an existing fire pump engine at 214 Ritchie Lane, Chehalis, WA. For administrative and tracking purposes SWCAA has assigned tracking number SUN-078 to this notification. This notification was filed in accordance with SWCAA 400-072 and applies to the installation of one fire pump engine. The fire pump engine was identified as:

- (1) 175 bhp diesel-fired John Deere model 6068TF252 engine to drive a Clarke Fire Protection model JU6H-UF34 fire pump. The engine is approved for stationary fire pump applications and other applications that do not require EPA Tier certification.

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 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).

**Summary Information (by SWCAA) for SUN-078**  
**Ritchie Bros. Auctioneers**  
**Emergency Fire Pump Engine**

A John Deere model 6068TF252 diesel-fired engine is used to drive a fire pump for the Ritchie Bros. Auctioneers facility. The following equipment details were available:

Location:	214 Ritchie Lane, Chehalis, WA 98532 Southwest corner of facility 46°33'8.49"N, 122°52'59.73"W
Engine Make / Model:	John Deere / 6068TF252
Engine Serial Number:	PE6068T852061
Fire Pump Make / Model:	Clarke Fire Protection / JU6H-UF34
Fuel:	Diesel
Fuel Consumption:	~10.1 gallons per hour at full standby load assuming 8,000 Btu/hp-hr efficiency
Horsepower Rating:	175 bhp @ 3,000 rpm in this application
Installation Date:	~2012
Engine Built (Date):	October 26, 2011
Engine Certification:	None – approved for use as a fire pump engine and other applications that do not require EPA Tier certification
Stack Description:	Not provided (being modified from horizontal to vertical)
Applicable Federal Regulations:	40 CFR 60 Subpart IIII 40 CFR 63 Subpart ZZZZ

Ritchie Bros. Auctioneers Fire Pump Engine. 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.

<b>Ritchie Bros. Auctioneers Fire Pump Engine</b>						
Hours of Operation =	200 hours					
Power Output =	175 horsepower					
Diesel Density =	7.206 pounds per gallon					
Fuel Sulfur Content =	0.0015 % by weight					
Fuel Consumption Rate =	10.1 gal/hr (estimated assuming 8,000 Btu/hp-hr)					
Fuel Heat Content =	0.138 MMBtu/gal (for use with GHG factors from 40 CFR 98)					
Pollutant	Emission		Emissions		Emission Factor Source	
	Factor g/(hp-hr)	Emissions lb/hr	Emissions tpy			
NO <sub>x</sub>	3.0	1.16	0.12	Table 4 Supart IIII		
CO	3.03	1.17	0.117	AP-42 Table 3.3-1		
VOC	1.14	0.44	0.044	AP-42 Table 3.3-1		
SO <sub>x</sub> as SO <sub>2</sub>		0.0022	0.0002	Mass Balance		
PM	0.22	0.08	0.0085	Table 4 Supart IIII		
PM <sub>10</sub>	0.22	0.08	0.0085	Table 4 Supart IIII		
PM <sub>2.5</sub>	0.22	0.08	0.0085	Table 4 Supart IIII		
Greenhouse Gases	kg/MMBtu	GWP	CO <sub>2</sub> e		Emission Factor	
			lb/MMBtu	lb/gallon	tpy, CO <sub>2</sub> e	Source
CO <sub>2</sub>	73.96	1	163.05	23	23	40 CFR 98
CH <sub>4</sub>	0.003	25	0.165	0.023	0.02	40 CFR 98
N <sub>2</sub> O	0.0006	298	0.394	0.054	0.06	40 CFR 98
Total GHG - CO <sub>2</sub> e	74.0		163.6	23	23	