

July 24, 2023

AJ Panter, Executive Director
Vancouver School District
2901 Falk Road,
Vancouver, Washington 98661

Subject: Notification of Emergency Generator Installation – Ruth Bader Ginsburg Elementary School (SUN – 309)

Dear Mr. Panter:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on July 7, 2023, for installation and operation of an emergency generator engine at Ruth Bader Ginsburg Elementary School. For administrative and tracking purposes SWCAA has assigned tracking number SUN-309 to this notification. This notification was filed in accordance with SWCAA 400-072 and applies to the installation of one emergency generator engine. The new unit was identified as:


198 bhp diesel-fired FPT model F4GE9685A*J engine to drive a 100 kW Generac model SD100 generator set. The engine is EPA Tier 3 certified and meets the standards for stationary emergency engines.

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(5)(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 131.

Sincerely,



Clinton Lamoreaux
Chief Engineer



SWCAA 400-072 Emission Standards for Selected Small Source Categories

[Statutory Authority: Chapter 70A.15.2040 RCW. Original adoption 93-21-003 filed 10/7/93, effective 11/8/93; 95-17-084 filed 8/21/95, effective 9/21/95; 96-21-098 filed 10/21/96, effective 11/21/96; 99-07-027 filed 3/10/99, effective 4/11/99; 01-05-055 filed 2/15/01, effective 3/18/01; 03-21-045 filed 10/9/03, effective 11/9/03; 09-21-056 filed 10/15/09, effective 11/15/09, 16-19-009 filed 9/8/16, effective 10/9/16; 20-06-003 filed 2/19/20, effective 3/21/20; 21-17-054 filed 8/10/21, effective 9/10/21; 23-03-057 filed 1/11/23, effective 2/11/23]

(5) 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 50 or more, but 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 must 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 does not apply during periods of cold startup.

(iii) General requirements.

(A) Liquid fueled engines must only be fired on gasoline, #2 diesel, or biodiesel. Fuel sulfur content of liquid fuels must 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 must only be fired on natural gas or propane.

(C) Each compression ignition engine must be EPA Tier certified and manufactured no earlier than January 1, 2008.

(D) Each spark ignition engine must be comply with the provisions of 40 CFR 60 Subpart JJJJ (as in effect on the date cited in SWCAA 400-025).

(E) Engine operation must be limited to maintenance checks, readiness testing, and actual emergency use.

(F) Engine operation for maintenance checks and readiness testing must not exceed 100 hours per year. Actual emergency use is unrestricted.

(G) Each engine must be equipped with a nonresettable hourmeter for the purpose of documenting hours of operation.

(H) Engine exhaust must be discharged vertically. Any device that obstructs or prevents vertical discharge is prohibited.

(iv) **Recordkeeping requirements.** The information listed below must 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 must include the date and the name of the person making the record entry.

(A) Total hours of operation for each engine must be recorded annually;

(B) Hours of emergency use for each engine must be recorded annually;

(C) Fuel sulfur certifications must be recorded for each shipment of liquid fuel;

(D) Maintenance activities must be recorded for each occurrence consistent with the provisions of 40 CFR 60.4214;

(E) Upset conditions that cause excess emissions must be recorded for each occurrence; and

- (F) All air quality related complaints received by the permittee and the results of any subsequent investigation or corrective action must be recorded promptly after each occurrence.
- (v) **Emission monitoring requirements.** None.
- (vi) **Reporting requirements.**
 - (A) The owner or operator of an affected "emission unit" must provide written notification of initial operation to SWCAA within 10 days of occurrence.
 - (B) All air quality related complaints received by the owner or operator must be reported to SWCAA within three calendar days of receipt.
 - (C) The owner or operator of an affected emergency engine must 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).