

May 16, 2025

Brian Taylor
Facilities Manager
City of Vancouver – Fire Station 11
415 W. 6th Street
Vancouver, WA 98660

Subject: Notification of Emergency Generator at City of Vancouver – Fire Station 11
(SUN – 363)

Dear Brian Taylor:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on April 24, 2025, for installation and operation of an emergency generator engine at City of Vancouver – Fire Station 11. For administrative and tracking purposes SWCAA has assigned tracking number SUN-363 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 emergency generator engine was identified as:

A 315 bhp diesel-fired Caterpillar C7.1 engine to drive a 200 kW Caterpillar model D200GC 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).