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west virginia department of environmental protection

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Division of Air Quality  
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Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
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**MEMORANDUM**

**To:** Beverly McKeone  
**From:** William T. Rothwell II  
**Date:** April 1, 2015  
**Subject:** Hardy Cellular Telephone Company – Prunytown- 416460 – Taylor County, WV  
**ID #:** 091-00045  
**APP #:** PD15-027

**BACKGROUND INFORMATION:**

Hardy Cellular Telephone Company installed a 37 KW – Kohler 40REOZJC generator set utilizing a diesel fired (80 HP) John Deere 4024HF285B engine at the above subject facility in 2012. The Certified Tier 3 compliant diesel was manufactured in 2012.

The engine is a new source (constructed on or after June 12, 2006), located at an area source of HAPs, and is therefore subject to 40CFR63, Subpart ZZZZ (NESHAP). Due to the year of construction of the engine, it is subject to a substantive requirement of that Federal Rule in which it must comply with 40CFR60 Subpart IIII (NSPS) if applicable.

Since the certified engine is  $\leq$  500 HP and was manufactured after April 1, 2006, although subject to IIII, it is not subject to a substantive requirement in 40CFR60 Subpart IIII. The subject engine is Tier 3 compliant and complies with USEPA regulations under 40CFR89 Tier 3 emissions limits when tested per ISO 8178 D2.

The potential emissions for the engine are as follows:

<u>Pollutant</u>	<u>LB/HR</u>	<u>TPY (8,760 hrs)</u>
PM	0.15	0.67
PM <sub>10</sub>	0.15	0.67
VOCs	0.18	0.78
CO	0.47	2.05
NO <sub>x</sub>	2.17	9.52
SO <sub>2</sub>	0.14	0.63
HAPs	0.01	0.01

**RECOMMENDATION:**

The emission rates are below the emission limits of six (6) lb/hr and ten (10) TPY; 2 lb/hr, or 5 TPY of HAPs set forth set forth in 45CSR13 - 2.17.a&b., and does not trigger a substantive requirement of any State or Federal air quality regulation. Therefore, a permit is not required by this Division for the installation and operation of the above mentioned emergency generator.



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William T. Rothwell II, P.E.  
Engineer

4/1/2015

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Date