west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
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MEMORANDUM

To: Beverly McKeone
From: William T. Rothwell II
Date: February 5, 2016
Subject: WV Alliance, LC, dba Ntelos – CH301 Sissonville – Kanawha County, WV
ID #: 039-00631
APP #: PD16-010

BACKGROUND INFORMATION:

WV Alliance, LC, dba Ntelos submitted a request to terminate General Permit Registration G65-C418. The documentation included with the Permit Determination Form showed that the applicant installed a 20 KW – Cummins 20DSKBA generator set utilizing a diesel fired (36 HP) Kabuta V2203-M engine and 100 gallon integrated tank at the above subject facility. The Certified Tier 4 compliant diesel engine 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 ≤ 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 4 compliant and complies with USEPA regulations under 40CFR89 Tier 4 emissions limits when tested per ISO 8178 D2.

The potential emissions for the engine are as follows:

Pollutant	LB/HR	TPY (8,760 hrs)
PM	0.01	0.04
PM_{10}	0.07	0.03
VOCs	0.09	0.39
CO	0.37	1.62
NO_x	0.23	1.01
SO_2	0.08	0.35
HAPs	0.04	0.17

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 operation of the above mentioned emergency generator.

William T. Rothwell II, P.E.
Engineer

02/05/2016
Date