



west virginia department of environmental protection

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MEMORANDUM

To: Beverly McKeone, P.E. – New Source Review Program Manager

From: Ed Andrews, Engineer *EAK*

Date: June 17, 2015

Subject: Class I Administrative Update to Reinstate Permit R13-2658 (R13-2658A) for the West Virginia National Guard – Camp Dawson (077-00078) and Update General Permit Registration G60-C042A (G60-C042B)

On June 2, 2015, the DAQ received two requests from the West Virginia Army National Guard (WVANG) to reinstate Permit R13-2658 and update Registration G60-C0042A. Currently, Registration G60-C0042A covers five emergency generators which are located at Camp Dawson, which is near Kingwood, WV. Emergency generators G1 and G2 are excluded engines under the RICE MACT (Subpart ZZZZ to Part 63). The other three generators are subject to Subpart IIII and are considered certified engines with regards to the emission standard to Subpart IIII.

The WVANG has selected several emergency generators to participate in the emergency demand response program. At Camp Dawson, the WVANG has selected G1, G2, G3, and G5 to participate to the program. By entering into this program, G1 and G2 became affected sources in Subpart ZZZZ. G3, and G5 were technically subject to Subpart ZZZZ but Subpart ZZZZ notes that these engines satisfies the requirement of Subpart ZZZZ by meeting the requirements of Subpart IIII to Part 60. Thus, no further requirements of Subpart ZZZZ would apply to G3 and G5 (40 CFR §63.6590(c)(1)). With regards to eligibility to the G60-C General Permit, G3 and G5 are not actually subject to any requirement in Subpart ZZZZ to Part 63, and therefore are still eligible to be covered by the G60-C General Permit.

However, G1 and G2 will be subject to requirements of Subpart ZZZZ to Part 63 and therefore are no longer eligible to be covered by the general permit. The WVANG has proposed to request that Permit R13-2658 be reinstated for G1 and G2. These generators were originally permitted under R13-2658 when installed and the Registration G60-C042A will be updated to reflect the removal of G1 and G2 from the registration.

NESHAP

The following will discuss the key applicable parts of the engine for the generator set with its corresponding subpart.

Subpart ZZZZ

The internal combustion engine for each emergency generator set is classified as an affected source under the NESHAP for Stationary Reciprocating Internal Combustion Engines (Subpart ZZZZ). The proposed engines will have a power output rating of 2922 bhp. An emergency demand response is determined and declared by the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3 or other authorized entity as determined by the Reliability Coordinator.

The WVANG has elected to enter into an agreement to operate these engines as part of the PJM Emergency Load Response Program, which meets the definition of Emergency Demand Response per the subpart. An emergency demand response is determined and declared by the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3 or other authorized entity as determined by the Reliability Coordinator, which would be PJM. Thus, the engine is subject to this subpart and the following are the applicable requirements for a limited use engine with an obligation to operate for more than 15 hours per year for emergency demand response:

- Operate and maintain the engine per manufacturer's instructions or develop and implement a maintenance plan.
- Limit non-emergency operation to 100 hours per calendar year, which included emergency demand response.
- Be fueled only with ultra-low sulfur diesel starting in 2015.
- Oil & oil filter changes every 500 hours of operation or at least annually
- Inspect & replace if necessary air filter, belts, and hoses every 1,000 hours of operation or at least annually.
- Must be equipped with a non-resettable hour meter.
- Report the demand response hours starting in 2015.

The proposed change in applicability status for G1 and G2 as affected sources under the RICE MACT will not increase emissions or trigger any other requirement than what have already been noted. The existing emission limits in the general permit registration will be incorporated into Permit R13-2658A. The fuel usage and operating schedule limits were incorporated as a means to demonstrate compliance with the hourly and annual emission limits. The existing sulfur content limitation was replaced with the more stringent requirement from the RICE MACT. These changes clearly fall within the criteria of a Class I Administrative Update in 45CSR§13-4.2.a.4. Thus, the writer recommends to the Director to issue Permit R13-2658A to The Adjutant General's Department as the response for their Class I Administrative Update request.