



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 

Date: June 18, 2015

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

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.

The G60-C General Permit has not been updated to include the requirement for emergency engines participating in the emergency demand response program that are subject to Subpart IIII. The additional requirement for these engines under the emergency demand response program are reporting the hours of operation for emergency demand response to Administrator, which would by-pass the Director.

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The proposed changes would not have any affect in applicability status for G3, G4, and G5 as affected sources under the Subpart IIII and will not increase emissions or trigger any other requirement other than what has already been noted. These changes clearly fall within the criteria of a Class I Administrative Update either in 45CSR§13-4.2. and the change would not allow the WVANG to circumvent any requirements in Subpart IIII or Subpart ZZZZ. Thus, the writer recommends to the Director to issue Registration G60-C042B to The Adjutant General's Department as the response for their Class I Administrative Update request.