



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: March 3, 2016
Subject: WKLC, Inc. – WKLC-FM Radio Tower – Putnam County, WV
ID #: 079-00190
APP #: PD16-020

BACKGROUND INFORMATION:

WKLC, Inc. originally submitted a G65-C General Permit application for their proposed emergency generator on February 17, 2016. Upon initial review, it was determined that a G65-C General permit was not necessary for the facility due to the emissions being below permitting thresholds and an EPA Certified Tier 3 engine was being utilized. Also, the certified engine is not subject to a substantive requirement of 40CFR60 Subpart IIII that would require the facility to obtain an air permit.

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 engine used in the proposed generator set complies with Tier 3 emissions limit of U.S. EPA NSPS for stationary emergency engines under 40CFR60 Subpart IIII when tested per ISO 8178 D2.

The potential emissions for the engine are as follows:

<u>Pollutant</u>	<u>LB/HR</u>	<u>TPY</u>
PM ₁₀	0.06	0.01
VOCs	2.14	0.54
CO	0.50	0.13
NO _x	2.14	0.54
SO ₂	0.66	0.16

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

William T. Rothwell II, P.E.
Engineer

03/03/2016

Date