



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone (304) 926-0475 • FAX: (304) 926-0479

Joe Manchin, III, Governor
Randy C. Huffman, Cabinet Secretary
www.wvdep.org

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

General Permit No.: Class I General Permit G65-C (Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Emergency Generators)

The Secretary may develop and issue Class I and Class II general permits under 45CSR13 authorizing the construction, modification or relocation of a category of sources by the same owner or operator or involving the same or similar processes or pollutants upon the terms and conditions specified in the general permit.

Engineer Assigned: Jerry Williams II, P.E.
G65-C Registration Fee Amount: \$250.00 (Construction, Modification, and Relocation)
\$300.00 (Class II Administrative Update)

Description: All emergency generators installed for the purpose of allowing key systems to continue to operate without interruption during times of utility power outages, including emergency generators installed at Title V(major) facilities and other facilities having additional point sources of emissions, are eligible for Class I General Permit registration. General Permit G65-C is being modified to include the New Source Performance Standards of 40CFR60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

General Permit G65-C language will be the same for all facilities that want to use General Permit G65-C. The Registration forms will be different for each facility. The Registration form shall list all emission sources and sections of the general permit, which are applicable to the particular facility.

General Permit G65-C will undergo public notice prior to being issued. The public notice will appear in the Charleston Newspapers, Dominion Post, The Herald Dispatch, The Journal, and the State Register.

EMISSION SOURCES AND ELIGIBILITY

All emergency generators installed for the purpose of allowing key systems to continue to operate without interruption during times of utility power outages, including emergency generators installed at Title V(major) facilities and other facilities having additional point sources of emissions, are eligible for Class I General Permit registration except for:

1. Any emergency generator which is a major source as defined in 45CSR14, 45CSR19 or 45CSR30;
2. Any emergency generator subject to the requirements of 45CSR14, 45CSR15, 45CSR19, 45CSR25, 45CSR27, 45CSR30, 45CSR34;
3. Any emergency generator which is located at a facility having other point source emissions;
4. Any emergency generator whose estimated hours of operation exceeds 500 hours per year;
5. Any emergency generator whose estimated emissions exceed six (6) pounds per hour AND ten (10) tons per year for more than one of the following pollutants: Nitrogen Oxides, Carbon Monoxide, Sulfur Dioxide, Volatile Organic Compounds (VOC), and Particulate Matter;
6. Any emergency generator located in or which may significantly impact an area which has been determined to be a nonattainment area. Unless otherwise approved by the Secretary.
7. Any emergency generator which will require an individual air quality permit review process and/or individual permit provisions to address the emission of a regulated pollutant or to incorporate regulatory requirements other than those established by General Permit G65-C.

SITE INSPECTION

The registrant shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times enter upon the registrant's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Class I General Permit.
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution Control equipment), practices, or operations regulated or required under this Class I General Permit.
- d. Sample or monitor at reasonable times, substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

G65-C applicants are required to submit emission estimates and supporting calculations for each affected source located at the facility. These emissions will be reviewed by the DAQ to determine that the registrant meets the requirements of General Permit G65-C.

REGULATORY APPLICABILITY

The following rules apply to General Permit G65-C:

45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation

As provided in 45CSR13, The Secretary may develop and issue Class I general permits under this rule authorizing the construction, modification or relocation of a category of sources by the same owner or operator or involving the same or similar processes or pollutants upon the terms and conditions specified in the general permit. For eligible applicants and/or registrants, Class I General Permit registration satisfies the construction, modification, relocation and operating permit requirements of 45CSR13. General Permit G35-A sets forth reasonable conditions that enable eligible applicants and/or registrants to establish enforceable permit limits.

45CSR22 Air Quality Management Fee Program

45CSR22 applies to all registrants which are minor sources and no NSPS applies. The affected registrants will be subject to the fee schedule set forth in 45CSR22. They are also required to keep their Certificate to Operate status current.

45CSR30 Requirements for Operating Permits

Certain emergency generators are subject to 40CFR60, Subpart IIII or 40CFR60 Subpart JJJJ, and therefore subject to 45CSR30 as a deferred source.

40CFR60 Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines)

Subpart IIII sets forth emission limits, fuel requirements, installation requirements, and monitoring requirements based on the year of installation of the subject emergency generator.

40CFR60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines)

Subpart JJJJ sets forth emission limits, fuel requirements, installation requirements, and monitoring requirements based on the year of installation of the subject emergency generator.

The following rules do not apply to the facility:

40CFR63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)

This action promulgates national emission standards for hazardous air pollutants (NESHAP) for stationary reciprocating internal combustion engines (RICE) with a site rating of more than 500 brake horsepower (HP) that are major sources of HAPs.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

Small amounts of non-criteria regulated hazardous or toxic air pollutants such as benzene, ethylbenzene, toluene, xylenes and formaldehyde may be emitted. Total non-criteria regulated hazardous/toxic air pollutant emissions are tabulated for each registered emergency generator in the Class I General Permit Registration Application. A toxicity analysis will be performed when the Director finds existing circumstances and/or submitted data provide cause for an assessment to be made concerning whether a specific emergency generator may interfere with attainment or maintenance of an applicable ambient air quality standard or cause or contribute to degradation of public health and welfare. Any emergency generator granted Class I General Permit registration by the Director shall not have a potential to emit of 10 tons per year of any hazardous/toxic pollutant or 25 tons per year of any combination of hazardous/toxic pollutants.

AIR QUALITY IMPACT ANALYSIS

Air dispersion modeling will be performed when the Director finds existing circumstances and/or submitted data provide cause for an assessment to be made concerning whether a specific emergency generator may interfere with attainment or maintenance of an applicable ambient air quality standard or cause or contribute to a violation of an applicable air quality increment from any proposed Class I General Permit registration action. Factors to be considered when determining whether an ambient air assessment would be made include:

- a. Existing air quality of the area
- b. Topographic or meteorological factors
- c. Maximum emissions
- d. Siting criteria

DEVELOPMENT OF GENERAL PERMIT G65-C

All registered facilities under Class I General Permit G65-C are subject to Sections 1.0, 2.0, 3.0, and 4.0.

Each applicant will then choose which of the following sections that they are seeking registration for under General Permit G65-C:

- Section 5 Reciprocating Internal Combustion Engines (R.I.C.E.)*
- Section 6 Tanks
- Section 7 Standards of Performance for Stationary Compression Ignition Internal
Combustion Engines (40CFR60 Subpart IIII)
- Section 8 Standards of Performance for Stationary Spark Ignition Internal
Combustion Engines (40CFR60 Subpart JJJJ)

*** Affected facilities that are subject to Section 5 may also be subject to Sections 7 or 8. Therefore, if the applicant is seeking registration under both sections, they will need to select both sections.**

RECOMMENDATION TO DIRECTOR

General Permit G65-C meets all the requirements of applicable regulations when all of the applicable control devices are functioning properly. Therefore, it is recommended that General Permit G65-C should be issued.

Jerry Williams II, P.E.
Engineer

Date