



---

west virginia department of environmental protection

---

Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304-2345  
Phone: 304 926 0475 • Fax: 304 926 0479

Jim Justice, Governor  
Austin Caperton, Cabinet Secretary  
www.dep.wv.gov

**MEMORANDUM**

**To:** Beverly McKeone  
**From:** William T. Rothwell II  
**Date:** August 18, 2017  
**Subject:** City of Huntington Sanitary Board – Sanitary Board Office – Cabell County, WV  
**ID #:** 011-00219  
**APP #:** PD17-036

**BACKGROUND INFORMATION:**

City of Huntington Sanitary Board has installed a natural gas fired emergency auxiliary generator set at their above subject facility. The Ford TSG416I-6005A generator set utilizes a 33.5 hp engine that was manufactured prior to December 19, 2008.

The engine is considered a new engine (constructed after June 12, 2006), located at an area source of HAPs, and is therefore subject to 40CFR63, Subpart ZZZZ (NESHAP). Due to the size of the engine, it is not subject to a substantive requirement of that Federal Rule, but it must comply with 40CFR60 Subpart JJJJ (NSPS) if applicable.

The engine was manufactured before January 1, 2009, thus it will not be subject to a substantive requirement 40CFR60 Subpart JJJJ.

The potential emissions for the engine are below the regulated thresholds.

**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. Therefore, a permit is not required by this Division for the operation of the above mentioned emergency auxiliary generator.

---

William T. Rothwell II, P.E.  
Engineer

08/18/2017

---

Date