



west virginia department of environmental protection

Division of Air Quality
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Jim Justice, Governor
Austin Caperton, Cabinet Secretary
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MEMORANDUM

To: Beverly McKeone
From: William T. Rothwell II
Date: September 12, 2017
Subject: American Towers LLC – Monongah #310916 – Marion County, WV
ID #: 049-00153
APP #: PD17-043

BACKGROUND INFORMATION:

American Towers LLC is proposing to install a diesel-fired auxiliary generator set at their above subject facility. The EPA Certified Iveco/FPT Model F4GE9485A*J generator set utilizes a 132 hp engine that was manufactured in 2013.

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 IIII (NSPS) if applicable.

Since the certified engine is \leq 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 subject engine is Tier 3 compliant and complies with USEPA regulations under 40CFR89 Tier 3 emissions limits when tested per ISO 8178 D2.

The potential emissions (based on 500 hours/year) for the engine are as follows:

<u>Pollutant</u>	<u>LB/HR</u>	<u>TPY</u>
PM ₁₀	0.04	0.02
VOCs	0.78	3.42
CO	0.20	0.88
NO _x	0.04	0.02

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 installation and operation of the above mentioned auxiliary generator.

William T. Rothwell II, P.E.
Engineer

09/12/2017

Date