From:	Bowser, Dennis W
To:	Gent, Philip (ECY)
Cc:	Woolard, Joan G; Bowser, Dennis W; Rumburg, Brian P; Miskho, Anthony G
Subject:	Draft Off-Permit Change Form
Date:	Wednesday, October 08, 2014 10:04:59 AM
Attachments:	OffPermitChangeNotificationForm WTC West.doc OffPermitChangeNotificationForm WTC East.doc OffPermitChangeNotificationForm AY&AZ Farm DMI-LT.doc OffPermitChangeNotificationForm C Farm Compressor.doc OffPermitChangeNotificationForm Trailers C Farm.doc OffPermitChangeNotificationForm AN Farm.doc OffPermitChangeNotificationForm C Farm.doc

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Phil,

As discussed yesterday, attached are draft off-permit change forms for C and AN Farm engines for your consideration. The forms identify the 40 CFR 60 Subpart IIII requirements for the engines that would be incorporated into Table 1.6 of the Air Operating Permit. All of the light plants have the same requirements and have been grouped based on 5 different locations. There is an off-permit change form for each of the 5 different locations. WRPS will be preparing and maintaining of list of the specific engines that are associated with each off-permit change form. Four of the lights plants are being replaced with newer models.

WRPS is in the process of replacing the two generators with newer models with less HP. When the replacement models have been identified, draft off-permit change forms will be provided to you for these engines for your review.

An off-permit change form has also been provided for the compressor that is supporting C and AN Farm. There is currently 1 compressor supporting C Farm retrieval. The off-permit change is written to allow up to 2. As with the lights plants WRPS will be preparing and maintaining as list of the specific compressors associate with the off-permit change form.

WPRS recently purchased a larger light plant as a test case. According to the manufacturer, this light plant is capable of lighting ~ 10 acres. If this light plant works as anticipated, it could reduce the number of light plants required and additional light plants may be purchased. Attached is a draft off-permit change form for this light plant.

If you have any questions concerning the attached form or approach please feel free to contact me or Joan.

Thank you

Dennis