From: Karschnia, Paul T
To: Gent, Philip (ECY)
Cc: Engelmann, Richard H; Karschnia, Paul T; Miskho, Anthony G; Kaldor, Reed A
Subject: RE: 200E ETF Engine for inclusion into the AOP
Date: Monday, January 26, 2015 12:17:47 PM
Attachments: image004.png
image001.png

Phil,

There is no DPF on the engine. The CO limit makes sense, so the compliance method would be the ongoing maintenance record and owner's manual. Correct?

Tad

Paul (Tad) Karschnia
CHMM, ASQ-CQT, CESCO
Environmental Protection Technical Services
Phone (509)-376-2088/ Cell (541) 571-1627
Paul_T_Karschnia@rl.gov

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Plateau Remediation Company

From: Gent, Philip (ECY) [mailto:pgen461@ECY.WA.GOV]
Sent: Monday, January 26, 2015 8:37 AM
To: Karschnia, Paul T
Cc: Engelmann, Richard H; Kaldor, Reed A; Huth, Ralph J (Jeff)
Subject: RE: 200E ETF Engine for inclusion into the AOP

Paul,

While you were out, Jeff sent me images of the engine nameplate (thanks Jeff).

1. I'm planning on adding the CO limit of 5.0 g/KW-hr (60.4204(b) and 60.4201(a)) as a requirement.
2. I'm assuming the engine is NOT equipped with a diesel particulate filter.

Philip Gent, PE
Waste Management Section
Nuclear Waste Program
Washington Department of Ecology
Phone: (509) 372-7983
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FAX: (509) 372-7971

From: Karschnia, Paul T [mailto:Paul_T_Karschnia@rl.gov]
Sent: Thursday, January 22, 2015 11:58 AM
To: Gent, Philip (ECY)
Cc: Jackson, Dale E; Collins, Michael S; Watson, David J (Dave); Johansen, Stephanie K; Engelmann, Richard H; Karschnia, Paul T; Kaldor, Reed A
Subject: 200E ETF Engine for inclusion into the AOP

Phil,

I appreciate the time you took with me last week to discuss the steps for adding a non-emergency engine into the AOP. I discussed the option of transmitting the off-permit change notice via email with Mr. Jackson. The regulatory correspondence tracking system is not configured to easily allow for the inclusion of email, therefore the formal submission of the off-permit change notice will be by letter. We appreciate your willingness to streamline the submittal process.

I am informally including the engine information in the event it would help with your efforts in drafting the revision to the AOP. I have entered today's date (22 January 2015) as the date of change on the off-permit change notice as the letter transmittal entered our correspondence system today. The engine information follows:

- **Engine identifier:** 200E Effluent Treatment Facility Engine
- **Engine horsepower:** 74 horsepower
- **Cylinder displacement:** 3.3 liters
- **Engine Usage:** Non-Emergency
- **Regulation:** 40 CFR 60, Subpart IIII

- **Requirement Citation:** NSPS Subpart IIII
- **Condition:** (1) Non-methane hydrocarbons (NMHC) and nitrogen oxides (NOX) emission limit of 4.7 g/KW-hr
  (2) Particulate matter emission limit of 0.30 g/KW-hr
- **Compliance Requirement:** Compliance will be determined by operating and maintaining the engine in accordance with the manufacturer's recommendations or instructions.
- **Required Records:** (1) Manufacturer's maintenance or operation manual
  (2) Documentation of maintenance performed
- **State-Only** No
- **Calculation Model** Not applicable.
- **Condition:** Use of fuel per 40 CFR 60.4207 (b)
- **Periodic Monitoring:** Compliance will be demonstrated by use of fuel containing no greater than 0.0015 weight percent sulfur (15 parts per million by weight).
- **Test Method:** Not applicable.
- **Test Frequency:** Not applicable.
- **Required Records:** Vendor certification for diesel fuel sulfur content for all purchases.
- **State-Only** No.
- **Calculation Model** Not applicable.

Please let me know if you have any questions or concerns.

Tad

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