From: Gent, Philip (ECY)
To: Skorska, Maria (ECY); Schleif, Stephanie (ECY)
Cc: Skinnarland, Ron (ECY)
Subject: Language in response to WRPS request for IIII engine maintenance plans
Date: Thursday, February 19, 2015 8:43:00 AM

Maria and Stephanie,

Please read and comment on the language of this email to Tony (WRPS), Dennis Bowser (DOE), and Dale Jackson (DOE).

Tony,

I will amend the draft AOP for the WRPS NSPS Subpart IIII sections to the condition approval shown below.

As we discussed on the phone, if compliance requirement (2) is used – it is important to note the term "with good air pollution control practices for minimizing emissions". Specifically, if a WRPS generated maintenance plan deviates from the manufacture's written instructions for installation, configuration, operation, or maintenance in a manner that 'relaxes' the manufacturer's written instructions it cannot meet good air pollution control practices for minimizing emissions without some form of compensatory action(s).

An example of this would be creating a maintenance plan that only differs from the manufacturer's written instructions by changing the requirement for engine oil change after 'X' hours of operations in the manufacturer's written instructions to '2X' hours in the WRPS maintenance plan. This is clearly a relaxation of standards with no compensatory action to offset increased emission (or potential emissions). I can conceive of various actions WRPS could place into the maintenance plan that would minimize emissions (e.g. collect the exhaust and 'treat-it', install additional pollution abatement devices on each engine, etc…). Or WRPS could install monitoring devices on each engine to monitor the emission conditions below for NMHS, NOX, CO, and PM on an hourly basis to ensure the engines are complying with the condition.

The bar for WRPS to prove to Ecology their maintenance plan, if deviating from the manufacturer's written instructions, will minimize emissions is difficult. Ecology understands WRPS is not required to submit a maintenance plan to Ecology for approval before implementing it, however the Nuclear Waste Program Air Program will apply the logic presented in this email to evaluate any and all WRPS maintenance plan(s) during inspections or inquires related to WRPS NSPS Subpart IIII engines. If a WRPS maintenance plan doesn't meet the minimizing emission requirement, then all engines associated with that

maintenance plan will be deemed out of compliance.

Condition Approval

Condition: (1) Non-methane hydrocarbons (NMHC) and nitrogen oxides (NO_X) emission limit of 7.5 g/KW-hr.

(2) Carbon monoxide (CO) emission limit of 6.6 g/KW-hr.

(3) Particulate matter emission limit of 0.40 g/KW-hr.

Compliance Requirement: (1) Compliance will be determined by operating and maintaining the engine in accordance with the manufacturer's recommendations or instructions **OR**

(2) If the engine and control device is not installed, configured, operated, or maintained according to the manufacturer's emission-related written instructions, or the emission-related settings are changed in a way that is not permitted by the manufacturer, then:

- Keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engines in a manner consistent with good air pollution control practices for minimizing emissions.

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Required Records: (1) Manufacturer's maintenance or operation manual.

(2) Documentation of maintenance performed.

(3) Maintenance plan, as appropriate.

State-Only: No

Calculation Model: Not applicable.

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