From: Gent, Philip (ECY)
To: "Jackson, Dale E"
Subject: RE: 200E ETF Engine for inclusion into the AOP
Date: Thursday, January 29, 2015 2:12:43 PM
Attachments: image001.png

Dale,

Sent it to the editor.

However, NESHAP subpart IIII that the engine falls under is a requirement regardless if it is in the AOP.

As such, this is just something starting the 18 month clock for the next revision (as if it will be the only one ☺). Not expecting any issues, but if CHPRC wants something from Ecology – I can draft up what will be in the AOP next time and they can follow that.

Philip Gent, PE
Waste Management Section
Nuclear Waste Program
Washington Department of Ecology
Phone: (509) 372-7983
Email: pgen461@ecy.wa.gov
FAX: (509) 372-7971

From: Jackson, Dale E [mailto:dale.jackson@rl.doe.gov]
Sent: Thursday, January 29, 2015 2:06 PM
To: Gent, Philip (ECY)
Subject: RE: 200E ETF Engine for inclusion into the AOP

Phil:

Sorry, but I didn't get into my office to receive your e-mail until just a few minutes ago. I presume you have proceeded as you proposed, and that is o.k. If this creates some kind of difficulty for the Contractor, we will just have to do some type of work around. Thanks for the opportunity to respond, and sorry I wasn't able to do so more quickly.

Regards,
Dale Jackson

From: Gent, Philip (ECY) [mailto:pgen461@ECY.WA.GOV]
Sent: Thursday, January 29, 2015 10:39 AM
To: Jackson, Dale E
Cc: Karschnia, Paul T
Subject: RE: 200E ETF Engine for inclusion into the AOP

Dale,

I'm set to send the AOP Attachment 1 to our technical editor. That will 'lock-in' the changes to date.

Do you want me to put this engine into the AOP now or wait for the next revision?

Please let me know by noon today (sorry for the short timeframe). If no answer is given, I'll proceed w/o the engine in Revision B. It will be held for Revision C.

Philip Gent, PE
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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

Paul (Tad) Karschnia
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