From: Costello, Martin
To: Costello, Martin
Subject: (Archived w/ Attachments) RE: Exempt engines
Date: Wednesday, October 24, 2012 12:19:22 PM
Attachments: image001.jpg

My bad, I was looking at the emission factor at 3.2 thinking it was tpy….(my window was not expanded to see the tpy column)

Your list of "exempt engines " is fine.

Just let me know if any engines (like the pumps) in the spreadsheet are non-emergency.

Also, remember that we discussed having future engines listed and we can discuss further how to deal with engines that you know are planned to be installed in the next 5 yr period.

Martin Costello
Professional Engineer
Florida Department of Environmental Protection (DEP)
Division of Air Resource Management (DARM)
Office of Permitting and Compliance (OPC)
Power Plants Section
Phone: (850) 717-9040

Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: www.title5feeholiday.com

---

From: Costello, Martin
Sent: Wednesday, October 24, 2012 12:00 PM
To: 'Bumar, Rich'
Subject: Exempt engines

Good work on the spreadsheet. It looks like there may be some more doughnut hole engines to fit in the "exempt" list since there are only 3.2 tpy NOx in the 29 engines you have now. If you want to run Instant RICE on more of the engines, or look for the ones that fit in the 63.6590 categories---(look at 63.6590(c) (4) for rich burn SI engines less than 500 hp (lots of small generators could fit this) or (6) in that section of the rule for any "new or reconstructed under 500 hp" engine under Subpart ZZZZ (very generic category for CI or SI engines) but that is not subject to Subpart IIII or JJJJ….
It's just a matter of how much work you want to do on this list so let me know if you will expand this list and try to get closer to the 5 tpy of NOx. One factor to consider is your calculations only assume non-emergency operation at 75% load, and the 5tpy of NOx threshold would be for all engine operations, so total annual fuel consumption.

Just a reminder that the exempt engine (insignificant sources) list should only contain “Emergency” engines or “limited use” engines as the exemptions are only for these categories of engines. Please confirm.

So if there are any direct drive pumps that are not just for flooding or emergencies like fires, then these pumps should not be included as exempt since they may be non-emergency engines. I think your spreadsheet only lists emergency engines but I was not sure if any were direct drive water pumps that are used in non-emergency operation mode.
Are R001 through R009 emergency engines only used for flooding or other emergency situations like fires?

Thanks,

Martin Costello
Professional Engineer
Florida Department of Environmental Protection (DEP)
Division of Air Resource Management (DARM)
Office of Permitting and Compliance (OPC)
Power Plants Section
Phone: (850) 717-9040

Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: www.title5feeholiday.com