



Southwest Clean Air Agency

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www.swcleanair.org

January 13, 2014

Mr. Dave Lahti
PeaceHealth
1115 SE 164th Ave.
Vancouver, WA 98683

Subject: Final Approval for Operation of Emergency Generator Engines

Dear Mr. Lahti:

A final determination to issue Air Discharge Permit 14-3080 has been completed for Air Discharge Permit Application CL-2014 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for Air Discharge Permit Application CL-2014 was published in the permit section of SWCAA's internet website on December 26, 2013. SWCAA did not receive a request for a public comment period in response to the public notice, and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of Air Discharge Permit 14-3080 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (www.swcleanair.org/permitsADPfinals.asp). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Clint Lamoreaux at (360) 574-3058, extension 131.

Sincerely,

Robert D. Elliott
Executive Director

RDE: cl
Enclosures

cc: Ron Hulse
PeaceHealth SW Medical Center
PO Box 1600
Vancouver, WA 98668



SOUTHWEST CLEAN AIR AGENCY

**AIR DISCHARGE PERMIT
SWCAA 14-3080**

Issued: January 13, 2014

Facility Name: PeaceHealth – Columbia Center
Physical Location: 1115 SE 164th Ave., Vancouver, WA 98683

SWCAA ID: 1547

REVIEWED BY:


Paul T. Mairose, Chief Engineer

APPROVED BY:


Robert D. Elliott, Executive Director



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1. Equipment/Activity Identification

ID No.	Generating Equipment/Activity	# of Units	Control Measure/Equipment	# of Units
1	Kohler Emergency Generator Engine (463 hp John Deere Engine)	1	Ultra Low Sulfur Diesel ($\leq 0.0015\% S$) Limited Operation (≤ 200 hr/yr) EPA Tier 3	N/A
2	Caterpillar Emergency Generator Engine #1 (1,005 hp Caterpillar Engine)	1	Ultra Low Sulfur Diesel ($\leq 0.0015\% S$) Limited Operation (≤ 200 hr/yr) EPA Tier 2	N/A
3	Caterpillar Emergency Generator Engine #2 (1,005 hp Caterpillar Engine)	1	Ultra Low Sulfur Diesel ($\leq 0.0015\% S$) Limited Operation (≤ 200 hr/yr) EPA Tier 2	N/A

2. Approval Conditions

The following tables detail the specific terms and conditions of this permit. In addition to the requirements listed below, equipment at this facility may be subject to additional federal, state, and local regulations. The permit term or requirement number is identified in the left hand column. The permit term or requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit term or condition applies is listed in the right hand column.

2.1 Emission Limits

No.	Emission Limits	Equipment/Activity																									
1.	<p>Annual emissions from the emergency generator engines shall not exceed:</p> <table border="1"> <thead> <tr> <th></th> <th>NO_x (tons)</th> <th>CO (tons)</th> <th>PM₁₀ (tons)</th> <th>PM_{2.5} (tons)</th> </tr> </thead> <tbody> <tr> <td><u>Emergency Generator Engine</u></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Kohler Emergency Generator</td> <td>0.30</td> <td>0.27</td> <td>0.015</td> <td>0.015</td> </tr> <tr> <td>Caterpillar Emergency Generator #1</td> <td>1.16</td> <td>0.06</td> <td>0.005</td> <td>0.005</td> </tr> <tr> <td>Caterpillar Emergency Generator #2</td> <td>1.16</td> <td>0.06</td> <td>0.005</td> <td>0.055</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		NO _x (tons)	CO (tons)	PM ₁₀ (tons)	PM _{2.5} (tons)	<u>Emergency Generator Engine</u>					Kohler Emergency Generator	0.30	0.27	0.015	0.015	Caterpillar Emergency Generator #1	1.16	0.06	0.005	0.005	Caterpillar Emergency Generator #2	1.16	0.06	0.005	0.055	1 - 3
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2.	<p>Visible emissions from the emergency generator engines shall not exceed five percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400) except during startup. For the purposes of this requirement, the startup period ends when the earlier of the following operating events occurs:</p> <ul style="list-style-type: none"> (a) The engine has reached normal operating temperature; or (b) The engine has been operating for 15 minutes. 	1 - 3																									

2.2 Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
3.	The emergency generator engines shall only be fired on #2 diesel or better. The sulfur content of the fuel fired in the diesel engines shall not exceed 0.0015% by weight (15 ppm). A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.	1 – 3
4.	Operation of the emergency generator engines shall be limited to maintenance checks, readiness testing, and as necessary to provide emergency power.	1 – 3
5.	The emergency generator engines shall be operated no more than 200 hours per year each. Operation of each emergency generator engine for maintenance checks and readiness testing shall not exceed 100 hours per year. A nonresettable time totalizer shall be maintained on each engine and used to measure hours of operation.	1 – 3
6.	The exhaust from the emergency generator engines shall be discharged vertically above the level of the building or enclosure in which it is housed. Any device that obstructs or prevents vertical discharge is prohibited.	1 - 3
7.	Emission units identified in this Permit shall be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	Facilitywide

2.3 Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
8.	<p>The following information shall be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <ul style="list-style-type: none"> (a) The number of hours each engine is operated shall be recorded for each calendar year; (b) Maintenance activities that may affect emissions from the emergency generator engines shall be logged for each occurrence; (c) The sulfur content of the diesel fuel burned in the emergency generator engines shall be determined and recorded for each fuel delivery. A fuel supplier certification may be used in lieu of actual fuel testing; (d) Upset conditions that cause excess emissions shall be recorded for each occurrence; and (e) All air quality related complaints, including odor complaints, received by the permittee regarding activities controlled by the Permittee and the results of any subsequent investigation or corrective action shall be recorded for each occurrence. 	Facilitywide
9.	With the exception of data logged by a computerized data acquisition system, each record required by this Air Discharge Permit shall include the date and the name of the person making the record entry.	Facilitywide

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
10.	All records required by this Air Discharge Permit shall be available on site for a minimum period of no less than three years and shall be available for inspection by SWCAA representatives.	Facilitywide

2.4 Emission Monitoring and Testing Requirements

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
	None	

2.5 Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
11.	Excess emissions shall be reported to SWCAA as follows: (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and (c) No later than 30 days after the end of the month of discovery for all other excess emissions.	Facilitywide
12.	Deviations from permit conditions shall be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facilitywide
13.	All air quality related complaints received by the Permittee regarding activities controlled by the Permittee shall be reported to SWCAA within three days of receipt.	Facilitywide
14.	The following emissions related records shall be reported to SWCAA by March 15 th for the previous calendar year: (a) The number of hours each emergency generator engine was operated.	Facilitywide
15.	Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs) shall be reported annually to SWCAA by March 15 th for the previous calendar year.	Facilitywide

3. General Provisions

No.	General Provisions	
A.	The emission units specified in this Permit shall be maintained and operated in total and continuous conformity with the emission limits identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	

No.	General Provisions
B.	For the purpose of ensuring compliance with this Permit, duly authorized representatives of the Southwest Clean Air Agency shall be permitted access to the permittee's premises and the facilities being constructed, owned, operated and/or maintained by the permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this Permit and applicable regulations and to perform or require such tests as may be deemed necessary.
C.	The provisions, terms and conditions of this Permit shall be deemed to bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.
D.	Following transfer of ownership of the source or any portion thereof, the requirements of this Permit shall transfer to any new owner operating the equipment within the agency's jurisdiction.
E.	This Permit shall be posted conspicuously at or be readily available near the source.
F.	Approval to construct or modify specific pollution generating equipment shall become invalid if construction is not commenced within eighteen months after the date of issuance of this Permit, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time.
G.	This Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
H.	Compliance with the terms of this Permit does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
I.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit shall remain in effect and be enforceable.
J.	No change in this Permit shall be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the permittee for the relief sought.
K.	The Permittee shall have the burden of proof regarding unavoidable conditions that lead to excess emissions in accordance with SWCAA 400-107 "Excess Emissions." Excess emissions shall be reported to SWCAA as soon as possible. The permittee shall call in the upset condition via telephone as initial notification to SWCAA; a message may be left on the answering machine for conditions outside of normal business hours. The permittee shall record the upset conditions in the operations log for periodic inspection by SWCAA. A full report may be required by SWCAA if determined to be necessary.
L.	The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.



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State Environmental Policy Act

DETERMINATION OF NONSIGNIFICANCE (DNS)

Description of proposal:

ADP Application CL-2014: The proponent has applied for a permit to install and operate three emergency generator sets driven by diesel engines. The equipment produces emissions from the combustion of diesel fuel. At the emission levels proposed, this equipment will not have a significant adverse impact on ambient air quality. This permitting action is not expected to have any significant adverse impact on traffic, noise, glare, housing, or recreation opportunities.

Proponent:

PeaceHealth – (Mr. Dave Lahti)

Location of proposal, including street address if any:

1115 SE 164th Ave.
Vancouver, Washington 98683

Lead agency: Southwest Clean Air Agency

The lead agency for this proposal has determined that it does not have a probable significant impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

- There is no comment period for this DNS.
- This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by _____.

Responsible official: Paul T. Mairose, P.E.

Position/title: Chief Engineer

Address: Southwest Clean Air Agency
11815 NE 99th Street, STE 1294
Vancouver, WA 98682-2454
Phone: (360) 574-3058 ext. 130

Signature: Paul T. Mairose

Date: 4/13/14

