

The compressor engines are not subject to the requirements of NSPS Subpart JJJJ for Stationary Spark Ignition Internal Combustion Engines due to their date of manufacture. The following table shows the trigger dates for applicability to Subpart JJJJ for engines of their size as well as the actual dates of manufacture:

**Table 1 – Subpart JJJJ Applicability Dates of Manufacture for Lean Burn Engines Greater Than or Equal To 500 bhp and Less Than 1,350 bhp**

	Subpart JJJJ Trigger Date of Manufacture	Actual Date of Manufacture
Engine #1, Caterpillar Model No. G3516 LE	January 1, 2008	April 7, 2006
Engine #2, Caterpillar Model No. G3516LE	January 1, 2008	January 2006

NESHAPs Subpart ZZZZ does not apply to either engine. 40 CFR 63.6590(a)(2)(iii) characterizes a new engine as an affected source if it is a stationary reciprocating internal combustion engine (RICE) located at an area source of HAP emissions if construction of the stationary RICE is commenced on or after June 12, 2006. Springhill Station is an area source of HAPs because its potential HAP emissions are less than Title V thresholds. The Department approved Engine #1 for construction on May 20, 2009 and construction of Engine #2 is pending approval of this authorization. Therefore, both engines should be considered new affected sources under this subpart. 40 CFR 63.6590(c) states that “An affected source that is a new or reconstructed stationary RICE located at an area source... must meet the requirements of this part by meeting the requirements of ... 40 CFR part 60 subpart JJJJ for spark ignition engines. No further requirements apply for such engines under this part.” As discussed above, the engine is not subject to Subpart JJJJ. Therefore, both engines are technically subject to Subpart ZZZZ but there are no emission standards, testing, recordkeeping or monitoring requirements which are applicable.

The applicant estimates emissions from the Engine #2 (which are identical to Engine #1), based on the manufacturer’s data and 8,760 hours of operation per year, as follows and has submitted the manufacturer’s emissions data as verification:

**Table 2 – Emissions for new Caterpillar #G3516LE**

Pollutant	Potential Emission Rate (gm/bhp)	GP-5 Allowable Emission Rate (gm/bhp)	Potential Emission Rate (lb/hr)	Potential Emission Rate (tpy)
NOx	2.00	2.0	5.91	25.88
VOC	1.00	2.0	2.95	13.10
CO	2.00	2.0	5.91	25.88

The applicant estimates that emissions from the dehydrator, based on the manufacturer’s data (for NOx and CO emissions) and GRI-GLYCalc Version 4.0 (for uncontrolled VOC emissions) and 8,760 hours of operation per year as follows: