your energy partner
OPPD
Omaha Public Power District

444 South 16th Street Mall
Omaha NE 68102-2247

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SEP 01 2010
APCO

August 27, 2010
10-EA-140

Via Certified Mail
Mr. Chester Black
Environmental Quality Control Supervisor
Air Quality Control
Public Works Department
City of Omaha
5600 S. 10th Street
Omaha, NE 68107

Subject: RICE MACT Initial Notification

Dear Chester:

In accordance with 40 Code of Federal Regulations (CFR) 63.9(b) and 63.6645(a), please find enclosed initial notification forms for two engines located in the city of Omaha that are owned by the Omaha Public Power District (OPPD). This submittal provides notification that these engines are subject to the reciprocating internal combustion engine (RICE) maximum achievable control technology (MACT) regulations found at 40 CFR 63 Subpart ZZZZ.

Both of these engines are existing compression ignition (CI) emergency engines. Per 40 CFR 63.6645(a)(5), an initial notification isn't required for existing CI emergency engines. However, per NDEQ guidance, since neither of these engines have permit conditions specifically requiring that they be operated as an emergency engine (as defined in the RICE MACT), initial notifications are provided for theses engines. If it is determined that new permit conditions are required for these engines to be treated as emergency RICE under the RICE MACT, OPPD will submit the appropriate permit application to allow for a permit with these conditions to be in place prior to the May 3, 2013 RICE MACT compliance date for these engines.

If further information or clarification is required regarding the information contained in this submittal, please contact Bob Holmes at (402) 636-2505.

Bob Holmes

Bob Holmes
Environmental Affairs Administrator
Environmental & Regulatory Affairs

Attachments

cc: EPA Region VII
Jon Hansen
Mike Donahue

NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division

INITIAL NOTIFICATION FORM

Applicable Rule: *40 CFR Part 63, Subpart ZZZZ* - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) - Promulgated 6/15/04, 1/18/08, & 3/3/10

Company Name Omaha Public Power District – Energy Control Center Facility ID# Not Applicable

Owner/Operator/Title Omaha Public Power District

Mailing Address 444 South 16th Street Mall

City Omaha Zip 68102

Plant Address (if different than owner/operator's mailing address):

Street 4325 Jones Plaza

City Omaha Zip 68105

Plant Phone Number 402-552-4966

Plant Contact/Title Mike Donahue – Manager Transmission and Construction Equipment

This form must be completed, signed and submitted to the following agencies:

NDEQ Air Quality Division
1200 'N' St. Atrium, Suite 400
Lincoln, NE 68509-8922

and

Region VII EPA – Air & Waste Management
901 N. 5th Street
Kansas City, KS 66101-2907

If your facility is located in Omaha or Lancaster County, you must submit a notification to the appropriate air pollution control agency in that area and Region VII EPA.

Provide the following information for the applicable stationary engine(s). Add additional tables or rows as needed.

Unit #[1]	Engine Startup Date	Site Rating Brake Horsepower	Displacement[2] (liters/cylinder)	Fuel(s) Combusted	Compression Ignition	Spark Ignition	Emergency	Limited Use
Emergency Generator	1985	1344		Diesel Fuel	☒ YES	☐ 4-Stroke ☐ 2-Stroke ☐ Lean Burn ☐ Rich Burn	☒ YES	☐ YES

[1] The emergency generator is an emergency engine. Per 40 CFR 63.6645(a)(5), an initial notification isn't required for existing CI emergency engines. However, per NDEQ guidance, since this engine does not have permit conditions specifically requiring that it be operated as an emergency engine (as defined in the RICE MACT), this initial notification is provided for this engine. If it is determined that new permit conditions are required for this engine to be treated as an emergency RICE under the RICE MACT, OPPD will submit the appropriate permit application to allow for a permit with these conditions to be in place prior to the May 3, 2013 compliance date.

[2] The displacement information is not provided because it isn't needed in determining applicable requirements for this engine.

Source Classification - Check the box that applies:

☐ Facility is a major source of hazardous air pollutants (HAPs).*

☒ Facility is an area source of HAPs.*

**Note: A major source is a facility that has a potential to emit greater than 10 tons per year of any single HAP or 25 tons per year of all HAPs combined. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line.*

Is the engine(s) a new/reconstructed emergency or limited use engine and > 500 horsepower located at a major source of HAP ? ☐ **Yes** ☒ **No**

If YES, the engine(s) does not have any additional requirements under Subpart ZZZZ, but you must meet the requirements of 40 CFR Part 60 New Source Performance Standards Subpart IIII for Compression Ignition Engines or Subpart JJJJ for Spark Ignition Engines .

Source Type - Check the box that applies:

☐ New Source*

☒ Existing source*

**Note: To determine if you are a new or existing source, see the attached information following this form.*

Print or type the name and title of the Responsible Official for the facility:

Name: Jon T. Hansen **Title: Vice President – Energy Production and Marketing**

A Responsible Official can be:

- The president, vice president, secretary, or treasurer of the company that owns the plant;
- An owner of the plant;
- A plant engineer or supervisor of the plant;
- A government official, if the plant is owned by the Federal, State, City, or County government; or
- A ranking military officer, if the plant is located at a military base.

I CERTIFY THAT INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

JTHansen _____ 8/27/10 _____

(Signature of Responsible Official) *(Date)*