TEMPLE UNIVERSITY
A Commonwealth University

FACILITIES MANAGEMENT

1009 W. Montgomery Avenue
Philadelphia, Pennsylvania 19122
(215) 204-7920
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August 26, 2010

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SAP20

Mr. Thomas Huynh, Director
Philadelphia Air Management Services
321 University Avenue, 2nd Floor
Philadelphia, Pennsylvania 19104

Re: Temple University, Main Campus
Stationary RICE Initial Notification

Dear Mr. Huynh:

On behalf of Temple University (Temple), I am pleased to present this initial notification for applicable stationary reciprocating internal combustion engines (RICE) for Temple's Main Campus (PLID 08905) located at Broad Street and Montgomery Avenue, Philadelphia, Pennsylvania.. This notification is submitted in accordance with 40 CFR 63, Subpart ZZZZ *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* as promulgated on June 15, 2004, and its subsequent amendments.

The March 3, 2010 amendments to the rule addressed existing (prior to June 12, 2006) stationary compression ignition (CI) RICE internal combustion engines that are located at area sources of hazardous air pollutant emissions. In addition, this amendment addresses existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions and existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

Temple is an area source of hazardous air pollutant emissions. Existing, institutional emergency RICE located at an area source of HAP emissions do not have to meet the requirements of Subpart ZZZZ. New RICE (on or after June 12, 2006) at area sources of HAP emissions comply with Subpart ZZZZ through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, as applicable. Additional requirements under Subpart ZZZZ do not apply for such new sources.

On August 20, 2010, an amendment was issued to address emissions from existing stationary spark ignition (SI) engines less than or equal to 500 HP located at major sources and all existing stationary SI engines located at area sources. Initial notifications for affected SI units are required to be submitted within 120 days of the effective date of this amendment (October 19, 2010). . Temple has elected to include its affected SI units as part of this notification.

Pursuant to 40 CFR 63.6595(a)(1), the sources must be in compliance with 40 CFR 63, Subpart ZZZZ by May 3, 2013 or October 19, 2013 (as dictated by the engine category).

As required by 40 CFR 63.6645, an Initial Notification shall be submitted no later than 120 days after the facility becomes subject. The notice shall contain the information specified in 40 CFR 63.9(b)(2)(i) through (v) as follows:

i. The name and address of the owner or operator;
ii. The address (i.e., physical location) of the affected source;
iii. An identification of the relevant standard or other requirement, that is the basis of the notification and the source's compliance date;
iv. A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and,
v. A statement of whether the affected source is a major source or an area source.

The *Initial Notification of Applicability* form is attached. A description of the applicable sources is provided in the following table.

Temple University, Main Campus
Subpart ZZZZ Affected Sources

Unit Description	Source ID	Fuel	Capacity	Date of Construction	Engine Category
Standby Electric Generating Facility	19-G-01 19-G-02 19-G-03 19-G-04 19-G-05 19-G-06 19-G-07 19-G-08 19-G-09 19-G-10	Natural Gas	2250 brake Hp	October 1992	SI: Non-Emergency, 4SLB
Temple Towers Standby Emergency Generator	52-G-03	Natural Gas	60 kW (115 Hp)	2009	SI: Emergency
Alter Hall Emergency Generator #1	62-G-01	No. 2 Oil	350 kW	2008	CI: Emergency
Weiss Emergency Generator #3	58-G-03	No. 2 Oil	125 kW	2008	CI: Emergency
Paley Emergency Generator #1	32-G-01	Natural Gas	50 kW	2008	SI: Emergency
Presser Emergency Generator	39-G-01	No. 2 Oil	26 kW	2008	CI: Emergency
1700 N. Broad St. Generator	---	Natural Gas	25 kW	2008	SI: Emergency

Temple does not have affected units under Subpart ZZZZ at its Health Sciences Campus.

Should you have any questions regarding these compliance certifications, please feel free to contact me at (215) 204-4515.

Very truly yours,

Kurt Bresser
Energy Manager

cc: USEPA Region III, Air Protection Division

Attachment: Initial Notification of Applicability Form

Initial Notification of Applicability

National Emission Standards for Hazardous Air Pollutants:

Stationary Reciprocating Internal Combustion Engines

40 CFR Part 63 Subpart ZZZZ

☒ Yes, I am subject to 40 CFR Part 63 subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

NAICS code(s): *611310 (Colleges, Universities, and Professional Schools)*

Compliance Date: ☒ Existing source: May 3, 2013 ☐ New/reconstructed source: upon initial startup

Note: The May 3, 2013 compliance date for existing sources applies to the following engine types:

- Existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions
- Existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions
- Existing stationary CI RICE located at an area source of HAP emissions

Company name: *Temple University*

Facility name (if different): *Temple University, Main Campus*

Facility (physical location) address: *Broad Street and Montgomery Avenue, Philadelphia, PA 19122*

My facility is a (please choose one): ☐ Major source ☒ Area source

☐ Synthetic minor

Owner name/title: *Temple University*

Owner/company address: *Same as Facility*

Owner telephone number: *Not Applicable*

Owner email address (if available): *Not Applicable*

~~If the Operator information is different from the Owner, please provide the following:~~

Operator name/title: *Kurt Bresser, Energy Manager*
Temple University, Office of Facilities Management
1009 West Montgomery Avenue, Philadelphia, Pennsylvania 19122

Operator telephone number: *(215) 204-4515*

Operator email address (if available): *kurt.bresser@temple.edu*

I hereby certify that the information presented herein is correct to the best of my knowledge.

(Signature) 8/26/2010 (Date)

Andrew T. Riccardi, Associate Vice President, Facilities Management
(Name/title)

(215) 204-7939
(Telephone No.)