From: Bauder, Lilyann (ECY)
To: Gent, Philip (ECY); Heuston, Daniel (ECY)
Subject: AOP Engines
Date: Wednesday, November 29, 2017 1:33:32 PM

Phil and Daniel,

I took a look at Subparts IIII, JJJJ, and ZZZZ to look for information on if the permittee can make their own operation and maintenance plans to demonstrate compliance with the regulation. Below is what I found.

IIII

- 60.4211(a) and (g) allow for demonstration using a maintenance plan, records of maintenance, maintained and operated with good air pollution control practices, and performance testing based on HP of the engine

JJJJ

- 60.4242 allow for demonstration using a maintenance plan, records of maintenance, maintained and operated with good air pollution control practices, and performance testing based on engine HP, certification, year of manufacturing, and fuel type

ZZZZ

- 63.6625(e) allows the permittee to develop their own maintenance plan if the engine is one of ten listed, based on emergency status, site HP, and other factors
- This one is more confusing and not very clear

My recommendation is that we do not have sufficient information provided in the application to grant the request for DOE to develop their own O&M manuals for these engines. If they would like to submit information as to why they believe each engine qualifies for developing their own maintenance plan, then I think we can reevaluate at that time, on a per-engine basis.

FYI – both of the copies of regs you two provided are outdated. I would consider printing off new ones.

Thanks,

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