AIR MANAGEMENT PROGRAM					
A. SIGNIFICANT ENVIRONMENTAL ASPECT(S) Consumption of Energy Consumption of Fuel Emissions to Air	B. DOCUMENT CONTROL CODE	006.2500.11B – Air Emissions			
	C. DATE	August 30, 2008			
	D. PROGRAM LEAD	Sarah Hatch, PLMG/SIIM, x7199			

# E. OBJECTIVE(S)

1. Ensure the continued compliance with all applicable legal and other requirements governing the emission of potential pollutants to the atmosphere resulting from stationary sources.

2. TARGET	PERFORMANCE INDICATOR	RECORD/DOCUMENT	RESPONSIBILITY (LOCATION OF RECORD/DOCUMENT)	DATE TARGET COMPLETED
1a. Review existing policies and procedures relating to controlling air emissions by May 30, 2008	Completion of current Air Management Program (AMP) review	AMP Review Record	Sarah Hatch, PLMG/SIIM(ISSS), RO, Room 5247A, x7199	May 14, 2008
1b. Complete an assessment of the Air Management Program by August 30, 2008	Completion of Compliance Assessment	Compliance Assessment Report	Sarah Hatch, PLMG/SIIM(ISSS), RO, Room 5247A, x7199	July 9, 2008

## 3. CONDITIONS/IMPACTS AVOIDED BY IMPLEMENTING EMP

Implementing this EMP will keep the air emissions from the Region's sources below established thresholds that would require us to obtain a Title V air permit.

## 4. SPECIFIC LEGAL AND OTHER REQUIREMENTS MET THROUGH EMP

- a. Kansas Administrative Regulation 28-19; specifically Parts 28-19-11, Exceptions Due to Breakdowns or Scheduled Maintenance; 28-19-Emission Limitations for Particulate Matter for Indirect Heating Equipment; 28-19-300, Construction Permits and Approvals, Applicability; and 28-19-650 (b), Emissions Opacity Limits
- b. Title 10 Missouri Code of State Regulations (CSR) 10-6; specifically Part 10 CSR 10-6.061, Construction Permit Exemptions
- c. Wyandotte County Air Emission Source Construction Approval, Source ID 209-0275, 20 May 2003; and Air Emission Source Response, Source ID 209-0299, 17 March 2006
- d. KDHE Approval for Emergency Generator, 30 November 2005
- e. Kansas City Emergency Generator Permit #1181, 16 January 2007

### 5. PROGRAM DESCRIPTION

**NAME** 

The Region 7 air emitting stationary sources include three emergency power generators (one each at the RO, STC, and COOP/Warehouse site), six gas-powered humidification units, three gas-powered water heaters, and five gas-powered boilers at the STC. None of the water heaters at the RO are considered sources because they are electric-powered. With the exception of the emergency generators at the RO and COOP/Warehouse site, all of the other sources are owned by the STC building owner and are thus managed by them. Region 7 provides limited assistance/oversight of these sources through the STC building lease. Per the Kansas Department of Health and Environment (KDHE), none of the humidification units, water heaters, or boilers requires a permit. Likewise, none of the vents from the STC's fume hoods requires a permit. All of the generators are governed through a permit process that limits the number of hours they can be operated each year. An Environmental Procedure was created in 2007 to monitor the emergency generators and ensure the annual hourly requirements are not exceeded. In addition, periodic walkthroughs are conducted and documented that look at the general condition of the sources and to ensure the inspection certifications of the STC boilers remain current.

### 6. OPERATIONAL CONTROLS IN PLACE FOR EMP

Science & Technology Building Lease (GS-06P-00027)

Region 7 Environmental Procedure 07-03, Emergency

Generator Operation and Maintenance Program

DOCUMENT CONTROL NUMBER

EMS 007.3500.01C EMS 007.3500.16A

## 7. BUDGET (RESOURCES)

REQUIREMENT

ESTIMATED COST (\$000)

RO and COOP/Warehouse Generator Maintenance

\$1500

#### 8. TASKS AND RESPONSIBILITIES FOR ACHIEVING TARGETS

TARGET	TASK	SCHEDULE	Date Completed	RESPONSIBILITY
1a. Review existing policies and procedures relating to controlling air emissions by	1a1. Conduct initial program review	May 30, 2008	May 14, 2008	Sarah Hatch, PLMG/SIIM, RO, Room 5247A, x7199
May 30, 2008	1a2. Monitor compliance	Monthly	Monthly*	Sarah Hatch, PLMG/SIIM, RO, Room 5247A, x7199
1b. Complete an assessment of the Air Management Program by August 30, 2008	1b1. Conduct Assessment	July 30, 2008	June 26, 2008	Sarah Hatch, PLMG/SIIM, RO, Room 5247A, x7199
	1b2. Complete Assessment Report	August 30, 2008	July 9, 2008	Sarah Hatch, PLMG/SIIM, RO, Room 5247A, x7199

#### 9. REMARKS

- 1. The initial program review was completed on 14 May 2008 and documented in MFR, *Air Management Program Review FY08*, 14 May 2008. Recommendations made in the MFR were completed via emails sent to the COOP Site Manager and the Region 7 Facility Manager on this date by the Infrastructure Support Services Section Chief. In addition, the emergency generator operations summary for 2007 was also completed on this date (MFR, *Region 7 Emergency Generator Operations for CY 2007*). *Christopher L. Taylor; Chief, ISSS; 14 May 2008*
- 2. The Compliance Assessment was completed by Mike Bronoski on June 26, 2008. The Compliance Assessment Report was received on July 9, 2008. *Sarah Hatch; EMS Coordinator; July 15, 2008*
- 3. Monthly generator readings logged at the RO, STC and the COOP. Usage Log forwarded to EMS Coordinator for Air Management Program file.