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COMPANY

## INTEROFFICE MEMORANDUM

DATE: May 29, 1996  
TO: Gary Guinn, RMRS, D & D Compliance, Bldg. T130F, X8043  
FROM: *Carol Patnoe*  
Carol Patnoe, Kaiser-Hill, Air Quality Management, Bldg. T130C, X2440  
SUBJECT: AIR QUALITY REGULATORY REQUIREMENTS FOR BUILDING 889 DIESEL  
FUEL FIRED COMPRESSOR - CAP-075-96

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This correspondence is in response to a request for regulatory guidance concerning the use of a diesel fuel fired compressor to support Building 889 decontamination activities. According to verbal information received from Ron Heitland with RMRS, project personnel will rent an Ingersoll Rand 375 cubic feet per minute air compressor from Wagner Rents or Center Rental.

An Air Pollutant Emission Notice (APEN) and permit will not be required for the compressor, based on fuel consumption information provided by Wagner Rents and the project's duration. Estimated air emissions do not exceed reporting thresholds outlined in Colorado Air Quality Control Commission (CAQCC) Regulation No. 3, Part A, Section II.B.3.a. In addition, the equipment falls under an APEN exemption for non-road engines (CAQCC Regulation No. 3, Part A, Section II.D.1.sss). Although an APEN and permit are not required, RMRS will be responsible for the following:

- Record fuel consumption and hours of operation for the air compressor for the duration of the project and have recordkeeping logs available for review by Colorado Department of Public Health and Environment (CDPHE) inspectors and Kaiser-Hill Air Quality Management (AQM) personnel.
- Understand the opacity requirements outlined in CAQCC Regulation No. 1, Section II.A.1. The regulation states, "no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity". Notify Kaiser-Hill AQM if there is any doubt with respect to exceeding the 20% limit. Air Quality Management personnel will perform EPA Method 9 visual observations to verify compliance, if requested.

If you have any questions concerning this correspondence please contact me at X2440, digital page 5754 or Rob Garren with AQM/Radian Corporation at X2609, digital page 4281.

RMG

cc:

R. Garren            M. Hyder  
R. Heitland         G. Konwinski