

# Southwest Clean Air Agency

At permit writers I had a few questions for consideration.

Probably need some guidance on how to treat emergency use equipment such as diesel gensets. They are allowed to operate 8760 hours per year but likely would operate very limited hours. EPA tells us that the potential to emit should be based on 8760 hours per year unless there is a different limit established.

At a larger facility that may replace an existing large boiler with a slightly smaller and more efficient boiler, a facility is already permitted to have a boiler and the new boiler is lower in emissions but still would be subject to air permitting to get limits in place for the very specific boiler. Are there or will there be provisions for replacement actions like this that may require an air permit but not necessarily be a city or county permit.