



**RULE 74.9
STATIONARY INTERNAL COMBUSTION ENGINE
ENGINE OPERATOR INSPECTION PLAN
UPDATE REQUIREMENT**

The Ventura County Air Pollution Control Board adopted revisions to Rule 74.9 (Stationary Internal Combustion Engines) on November 8, 2005. Enforcement of revised Rule 74.9 will begin with the first quarter of 2006.

The requirements of the Engine Operator Inspection Plan in Section C of the rule will change in two important ways. Because of these changes, the District requires that your company submit an updated Engine Operator Inspection Plan by December 16, 2005. The changes are as follows:

1. In Subsection C.4, the Plan should reflect the new requirement (in Subsection B.5) for quarterly screening analysis. Note that, in any calendar quarter, an engine may be exempt from screening if:
 - a) The engine operates less than 32 hours in each of the three months in the quarter, or
 - b) The required biennial source test specified in Subsection B.4 is being performed.

Include also a procedure to notify the APCD by telephone 24 hours prior to any quarterly screening analysis. The number to call is (805) 654-2797.

2. The preventative or corrective maintenance procedure required in Subsection C.5 must now include the response time for both corrective action and reinspection. This is necessary due to a change in Subsection H.2, which defines a violation as a situation where an engine is "operated out of compliance with an approved Engine Operator Inspection Plan." If an out-of-compliance engine is fixed and reinspected within the response time in the plan, no violation will occur.

The other requirements of the plan, including identification (Subsection C.1), description (Subsection C.2), and location (Subsection C.3) have not been revised and require no change.

Although not required, it is helpful to have some additional information in your Engine Operator Inspection Plan. This information includes:

- Specification of the portable analyzer to be used for quarterly screening. Subsection G.5 of Rule 74.9 now requires the portable analyzer to be either verified by the Environmental Protection Agency or approved in writing by the APCO. EPA approved analyzers are listed at <http://www.epa.gov/etv/verifications/vcenter1-12.html>. Identify the portable analyzer you intend to use. To verify its ability to measure a violation of the NOx and CO emission limits in Rule 74.9, Section B (Requirements), include its specifications. Remember that there is an oxygen correction factor that may allow higher uncorrected NOx and CO readings.
- A list of engines expected to operate less than 200 hours per calendar year.
- A list of emergency standby engines. These engines must be operated only during an emergency and are limited to no more than 50 hours of maintenance operation per calendar year. The District requires a written statement to affirm the operator's intention to operate the engines as emergency only.

The District will make every effort to approve, in writing, the updated Engine Operator Inspection Plan by December 31, 2005.

If you have any questions regarding the revisions to Rule 74.9, please contact air quality engineer Don Price at 805/6451407. If you have any question regarding enforcement of the revisions to Rule 74.9, please contact air quality engineer Lyle Olson at 805/645-1413.

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