

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: Engineering Division

DATE: November 9, 2000

FROM: Karl E. Krause

SUBJECT: Permitting Policy for Backup Utility Generators

Background

As explained in Richard H. Baldwin's memorandum of October 27, 2000, the use of a backup utility generator (BUG) at a facility during a power interruption directed by the California Independent System Operator (ISO) is not covered under the emergency engine exemption in Ventura County APCD Rule 23.D.7. Therefore, BUGs not exempted by Rule 23.D.7 require a Permit to Operate. The purpose of this memorandum is to establish the permitting policy for these engines. Permitting policy is being established separately for existing BUGs (installed prior to October 27, 2000) and new BUGs.

Permitting Policy – Existing Backup Utility Generators Installed Prior to October 27, 2000

1. Existing BUGs will apply directly for a Permit to Operate pursuant to Rule 10.B.1.c. Applications will require a \$450.00 filing fee. Processing fees will be calculated pursuant to Rule 42.B.2.c. A late fee (Rule 42.F) will be required if the application is submitted after October 27, 2001.
2. Pursuant to Rule 26.3.A.1, existing BUGs will be exempt from the requirements of Rule 26.2, including the Best Available Control Technology and emission offsets requirements, provided a Permit to Operate application is submitted no later than October 27, 2001.
3. Existing BUGs will be limited to 200 hours per year (rolling 12 months) of operation. This includes both operation during maintenance activities and operation during a power interruption directed by the California ISO. Emergency operation when normal electrical power line service has failed will not be counted towards the 200 hour per year limit. BUGs will be required to have a non-resettable hour meter to demonstrate compliance. The permittee will be required to maintain records that differentiate between emergency hours of operation and backup utility hours of operation.
4. A health risk assessment will **not** be required to demonstrate compliance with Rule 51, "Nuisance".

5. Existing BUGs will **not** be subject to the public notification requirements of California Health & Safety Code Section 42301.6 if they are located within 1,000 feet from the outer boundary of a schoolsite.
6. Permitted emissions from existing BUGs will be calculated using EPA AP-42 emission factors as reflected in the District's "PEETs" permitting program. Engine specific emission factors will be used if submitted with the permit application and verified based on emission data contained in EPA or ARB engine databases.
7. Engines complying with the 200 hours per year limit above will be exempt from Rule 74.9, "Stationary Internal Combustion Engines". (See Rules 74.9.D.2 - 200 hours per year, 74.9.D.3 - emergency operations, Rule 74.9.D.8 - diesel engine 15% capacity factor.)

Permitting Policy – New Backup Utility Generators Installed On or After October 27, 2000

1. New BUGs will require Best Available Control Technology (BACT), as detailed in Rule 26.2.A. BACT is currently considered to be the following:
 - a. For NO_x, an emission rate of less than or equal to 6.9 grams per horsepower-hour.
 - b. For PM, an emission rate of less than or equal to 0.1 grams per horsepower-hour. An engine will be considered to meet this emission rate if this level was met during EPA certification testing, even if the engine is being certified to meet a higher level (e.g. 0.4 grams per horsepower-hour). If the engine as manufactured does not meet this standard, a catalyst based diesel particulate filter, or equivalent, will be required to meet the standard.
 - c. For SO_x, CARB diesel fuel with a maximum sulfur content of 0.05% by weight.
2. Engines that meet these BACT NO_x and PM emission limits without add-on controls will be considered BACT certified emissions units pursuant to Rule 16, "BACT Certification". An Authority to Construct will not be required for a new BUG at a facility that is defined as a "small source" in Rule 11. For all other new BUGs, an Authority to Construct must be obtained prior to installation and a Permit to Operate must be obtained prior to operation. Filing fees and processing fees will be required consistent with the above determination.
3. New BUGs will be subject to the emission offset requirements of Rule 26.2.B.
4. New BUGs will be limited to 200 hours per year (rolling 12 months) of operation. This includes both operation during maintenance activities and operation during a power interruption directed by the California ISO. Emergency operation when normal electrical

power line service has failed will not be counted towards the 200 hour per year limit. BUGs will be required to have a non-resettable hour meter to demonstrate compliance. The permittee will be required to maintain records that differentiate between emergency hours of operation and backup utility hours of operation.

5. For new BUGs meeting a PM emission rate of less than or equal to 0.1 grams per horsepower-hour and not located within 1,000 feet from the outer boundary of a schoolsite, a health risk assessment will **not** be required to demonstrate compliance with Rule 51, “Nuisance”.
6. New BUGs located within 1,000 feet from the outer boundary of a schoolsite will be subject to the public notification requirements of California Health & Safety Code Section 42301.6. If public notification is triggered, a health risk assessment will be required to fully describe the project and to demonstrate compliance with Rule 51, “Nuisance”.
7. Permitted emissions for NO_x, PM and SO_x will be calculated consistent with the BACT limits. Permitted emissions for ROC and CO from new BUGs will be calculated using EPA AP-42 emission factors as reflected in the District’s “PEETs” permitting program. Engine specific emission factors will be used if submitted with the permit application and verified based on emission data contained in EPA or ARB engine databases.
8. Engines complying with the 200 hours per year limit above will be exempt from Rule 74.9, “Stationary Internal Combustion Engines”. (See Rules 74.9.D.2 - 200 hours per year, 74.9.D.3 - emergency operations, Rule 74.9.D.8 - diesel engine 15% capacity factor.)

The California Air Resources Board may require diesel particulate filters for new BUGs as part of a planned Air Toxic Control Measure (ATCM). Backup utility generator engine projects should be designed and constructed to facilitate the future installation of a catalyst based diesel particulate filter.

BUGs Permit Policy