



Public Workshop

Proposed Rule 118.1 - Public Safety Provisions for Stationary
Emergency Standby Engines

Proposed Amended Rule 1470 – Requirements for Stationary
Diesel-Fueled Internal Combustion and Other Compression
Ignition Engines

July 29, 2021

1:00 PM

Join Zoom Webinar

<https://scaqmd.zoom.us/j/99399569731>

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Background

- Due to increasing wildfires, utilities have implemented Public Safety Power Shutoff (PSPS) events to proactively de-energize power lines in certain areas to reduce the possibility that infrastructure could cause or contribute to a wildfire
- During a PSPS event, critical service facilities relying on emergency standby engines may exceed South Coast AQMD annual operating limits
- Water and sewage facilities have requested use of an alternative maintenance and testing schedule to ensure engine reliability
- To address concerns regarding increased emergency engine usage and the need for an alternative maintenance and testing schedule, South Coast AQMD is proposing:
 - Proposed Rule 118.1
 - Proposed Amended Rule 1470

Overview

- Proposed Rule 118.1 (PR 118.1):
 - Critical service facilities may exclude emergency standby engine operating hours associated with PSPS events from 200 hour annual operating limit
- Proposed Amended Rule 1470 (PAR 1470)
 - Establishes an optional alternative maintenance and testing schedule for specific emergency standby engines in very high fire hazard severity zones

Proposed Rule Language

PR 118.1 - Public Safety Provisions for
Stationary Emergency Standby Engines

PR 118.1 Structure

- a) Purpose
- b) Applicability
- c) Definitions
- d) Provisions for Excluding Public Safety
Power Shutoff Events
- e) Notification Requirements
- f) Summary Report

Purpose (a)

- PR 118.1 will allow critical service facilities to exclude engine operating hours during a PSPS event from counting towards a 200 hour annual operating limit
- 200 hour annual operation includes all usage hours such as emergency use, non-emergency use such as PSPS events, maintenance, and testing

(a) Purpose

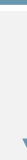
The purpose of this rule is to exclude usage hours for emergency standby internal combustion engines operating at a critical service facility due to a Public Safety Power Shutoff event.

- Applicability is specific to emergency standby engines at a critical service facility with an annual operating limit of 200 hours or less
- Critical service facility definition includes Essential Public Services (South Coast AQMD Rule 1302 definition), health facilities, telecommunication facilities, and other facilities based on stakeholder input
 - Pumping plants for sewage or recycled water
 - Natural gas delivery facilities

Applicability (b) and Definitions (c)

(b) Applicability

This rule shall apply to an owner or operator of an emergency standby engine with a South Coast AQMD permit condition that limits the operation to no more than 200 hours per year located at a critical service facility.



- (1) **CRITICAL SERVICE FACILITY** means an Essential Public Service as defined in Rule 1302, sewage pumping plants, pumping plants used for recycled water as defined in Title 22, Section 60304 of the California Code of Regulations, natural gas delivery facilities, health facilities as defined in Section 1250 of the California Health and Safety Code, and facilities used exclusively for telecommunications including radio and cell towers.

- Emergency standby engine definition is based on Rule 1110.2 with the addition of:
 - Engine use during loss of power
- Utility distribution company definition is based on Rule 1470 but clarified to include reference to the California Public Utilities Commission

Definitions (c)

- (2) EMERGENCY STANDBY ENGINE means an engine that operates as a temporary replacement for primary mechanical or electrical power during periods of fuel or energy shortage, loss of power, or while the primary power supply is under repair.
- (3) PUBLIC SAFETY POWER SHUTOFF EVENT means an event where a UTILITY DISTRIBUTION COMPANY may temporarily turn off power to specific geographic areas as allowed by the California Public Utilities Commission to proactively reduce the likelihood that their infrastructure could cause or contribute to a wildfire.
- (4) UTILITY DISTRIBUTION COMPANY means one of several organizations that manage energy transmission and distribution within the South Coast AQMD jurisdiction for electric power primarily in the grid system overseen by the California Public Utilities Commission.

Provisions For Excluding Public Safety Power Shutoff Events (d)(1)

- Facilities that elect to exclude engine operating hours due to a PSPS event are required to:
 - Notify the Executive Officer pursuant to subdivision (e)
 - Maintain a summary report of PSPS events [subdivision (f)]

(d) Provisions for Excluding Public Safety Power Shutoff Events

- (1) An owner or operator of an emergency standby engine at a critical service facility that operates an emergency standby engine may elect to exclude operating hours that occurred during a Public Safety Power Shutoff event as specified in paragraph (d)(2) from the 200 hour annual operating limit specified in a South Coast AQMD permit, provided the owner or operator:
 - (A) Notifies the Executive Officer pursuant to the notification requirements in subdivision (e); and
 - (B) Prepares and maintains a summary report pursuant to the requirements in subdivision (f).

Provisions For Excluding Public Safety Power Shutoff Events (d)(2)

- Only engine operating hours that occur during the following times are eligible to be excluded from the 200 hour annual operating limit:
 - De-energization period during a PSPS event
 - De-energization period due to repair activities related to a PSPS event
 - Up to three hours per each imminent shutoff notification received regardless if PSPS event occurs

- (2) An owner or operator of an emergency standby engine at a critical service facility that elects to exclude operating hours from the 200 hour annual operating limit specified in a South Coast AQMD permit, shall be limited to excluding operating hours that occurred during a Public Safety Power Shutoff event for the time periods:
- (A) When power was shut off, beginning on the date and time the power was shut off until the date and time the power was restored;
 - (B) Not to exceed three hours for each imminent shutoff notification received; and
 - (C) When the power was shut off due to repair activities that are directly associated with a Public Safety Power Shutoff event.

- Imminent shutoff notification means a notification by a utility distribution company sent to entities in a specific geographic area of an anticipated power shutoff due to a Public Safety Power Shutoff Event

- A facility that elects to exclude PSPS hours must notify the Executive Officer within 48 hours of knowing the emergency engine exceeded the 200 hour limit
 - One-time notification for the calendar year that the operator knew they exceeded the 200 hour annual operating limit
- Paragraph (e)(2) specifies the information to be provided during a notification

Notification Requirements (e)

(e) Notification Requirements

An owner or operator of an emergency standby engine at a critical service facility that elects to exclude operating hours pursuant to paragraph (d)(1) that occurred during a Public Safety Power Shutoff event pursuant to subparagraphs (d)(2)(A) through (d)(2)(C) shall:

- (1) Notify the Executive Officer by calling 1-800-CUT-SMOG within 48 hours of the time that the operator knew that an emergency standby engine exceeded the 200 hour annual operating limit specified in a South Coast AQMD permit for the calendar year; and
- (2) Provide the following information in the notification:
 - (A) Facility name;
 - (B) Facility Identification Number;
 - (C) Facility contact person and phone number;
 - (D) Permit number of emergency standby engine; and
 - (E) Estimated hours the facility exceeded the 200 hour annual operating limit due to a Public Safety Power Shutoff event pursuant to subparagraphs (d)(2)(A) through (d)(2)(C).

No notification needed if engine does not exceed 200 hours or has more than 200 non PSPS-related hours

- Facilities that seek to exclude PSPS engine operating hours must maintain a summary report including:

- Total engine operating hours
- Total operating hours associated with a PSPS event
- Date when facility notified the Executive Officer
- Supporting documentation

- Summary report:

- Must be available no later than January 15th to summarize previous calendar year
- Not required to be submitted, but must be kept onsite for at least five years
- Made available upon request

Summary Report (f)

(f) Summary Report

If the exclusion of operating hours of an emergency standby engine during time periods specified under in subparagraphs (d)(2)(A) through (d)(2)(C) prevents an engine from exceeding the 200 hour annual operating limit specified in a South Coast AQMD permit and the owner elects to exclude such operating hours, then the owner or operator of an emergency standby engine at a critical service facility shall:

- (1) No later than January 15th following the calendar year that the emergency standby engine would have exceeded the 200 hour annual operating limit, prepare a report that includes:

- (A) The total operating hours for the calendar year;
- (B) The total operating hours for the calendar year that are associated with a Public Safety Power Shutoff event pursuant to subparagraphs (d)(2)(A) through (d)(2)(C);
- (C) The date when the Executive Officer was notified pursuant to the provisions of subdivision (e); and
- (D) Supporting documentation from the utility distribution company of eligible operating hours for each Public Safety Power Shutoff event including:
 - (i) Date and time of imminent shutoff notification (if applicable);
 - (ii) Date and time of power shutoff notification; and
 - (ii) Date and time of power restoration notification.

- (2) Maintain the report specified in paragraph (f)(1) onsite for at least five years and make the report available to the Executive Officer upon request.

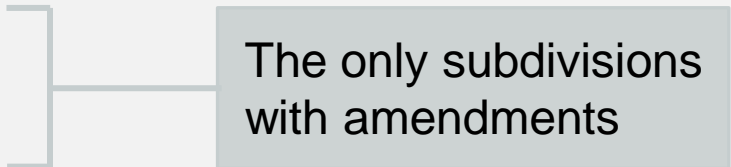
Can be in the form of engine logs that have a clear distinction between PSPS and non-PSPS hours

Documentation must be from utility distribution company

Proposed Amended Rule Language

PAR 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

PAR 1470 Structure

- a) Applicability
 - b) Definitions
 - c) Requirements
 - d) Recordkeeping, Reporting, and Monitoring Requirements
 - e) Compliance Schedule and Permit Application Dates
 - f) Emissions Data
 - g) Test Methods
 - h) Exemptions
 - i) Severability, Effect of Judicial Order
 - j) Applicability of the AB 2588 Air Toxics “Hot Spots” Program
 - k) Major Sources
- 
- The only subdivisions with amendments

Definitions (b)

- PAR 1470 will establish provisions applicable to water or sewage facilities with emergency engines located in a very high fire hazard severity zone
- New definitions added:
 - Very High Fire Hazard Severity Zone
 - Water or Sewage Facility

- (70) VERY HIGH FIRE HAZARD SEVERITY ZONE means land designated by the California Department of Forestry and Fire Protection pursuant to Public Resources Code 4201- 4204 and Government Code 51175-51189 as an area with a very high degree of fire hazard.
- (71) WATER OR SEWAGE FACILITY means a public entity that is responsible for water delivery operations, sewage pumping plants, sewage treatment, or water reclamation.

Requirements (c)(3)(C)(i)(I)

- Subclause (c)(3)(C)(i)(I) adds an optional maintenance and testing schedule for engines with a diesel PM emission rate greater than 0.4 g/bhp-hr and references subclause (c)(3)(C)(i)(III) which includes
 - An alternative testing schedule and
 - Criteria for using the alternative testing schedule

- (i) Diesel PM Standard and Hours of Operating Requirements
The owner or operator of in-use stationary emergency standby diesel-fueled engines (>50 bhp), except those located on school grounds or 100 meters or less from an existing, as of April 2, 2004, school shall meet the following requirements:
 - (I) No owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine (>50 bhp) that emits diesel PM at a rate greater than 0.40 g/bhp-hr more than 20 hours per year for maintenance and testing purposes unless the alternative maintenance and testing requirements of subclause (c)(3)(C)(i)(III) are met. In-use emergency standby diesel fueled CI engines operated at health facilities shall be allowed up to 10 additional hours per year for maintenance and testing purposes. This subclause ~~section~~ does not limit engine operation for emergency use and for emission testing to show compliance with subparagraph (c)(3)(C).

- Alternative testing schedule for engines limited to 20 hours per year:
 - Allows a maintenance and testing schedule of 20 hours averaged over a three-year rolling period
 - No individual calendar year can exceed 30 hours
- Alternative testing schedule is only applicable to water or sewage facilities with:
 - Engines located in a very high fire hazard severity zone
 - Engines not located in SB 535 disadvantaged community
- Operators that elect to use alternative testing provision must modify permit

Requirements (c)(3)(C)(i)(III)

(III) An owner or operator of a water or sewage facility with an in-use stationary emergency standby diesel-fueled CI engine (>50 bhp) located in a very high fire hazard severity zone, excluding engines located in SB 535 Disadvantaged Communities as identified by the California Office of Environmental Health Hazard Assessment's CalEnviroScreen, that elects to meet an alternative maintenance and testing schedule shall not conduct maintenance and testing for more than 20 hours averaged over a consecutive three-year rolling period, with no individual calendar year exceeding 30 hours where a South Coast Air Quality Management District operating permit incorporates the alternative maintenance and testing schedule. The consecutive three-year rolling period shall start the calendar year in which the permit is modified to incorporate the alternative maintenance and testing schedule. This subclause does not limit engine operation for emergency use and for emission testing to show compliance with subparagraph (c)(3)(C).

Water or sewage facility means a public entity that is responsible for water delivery operations, sewage pumping plants, sewage treatment, or water reclamation

Impacted Facilities

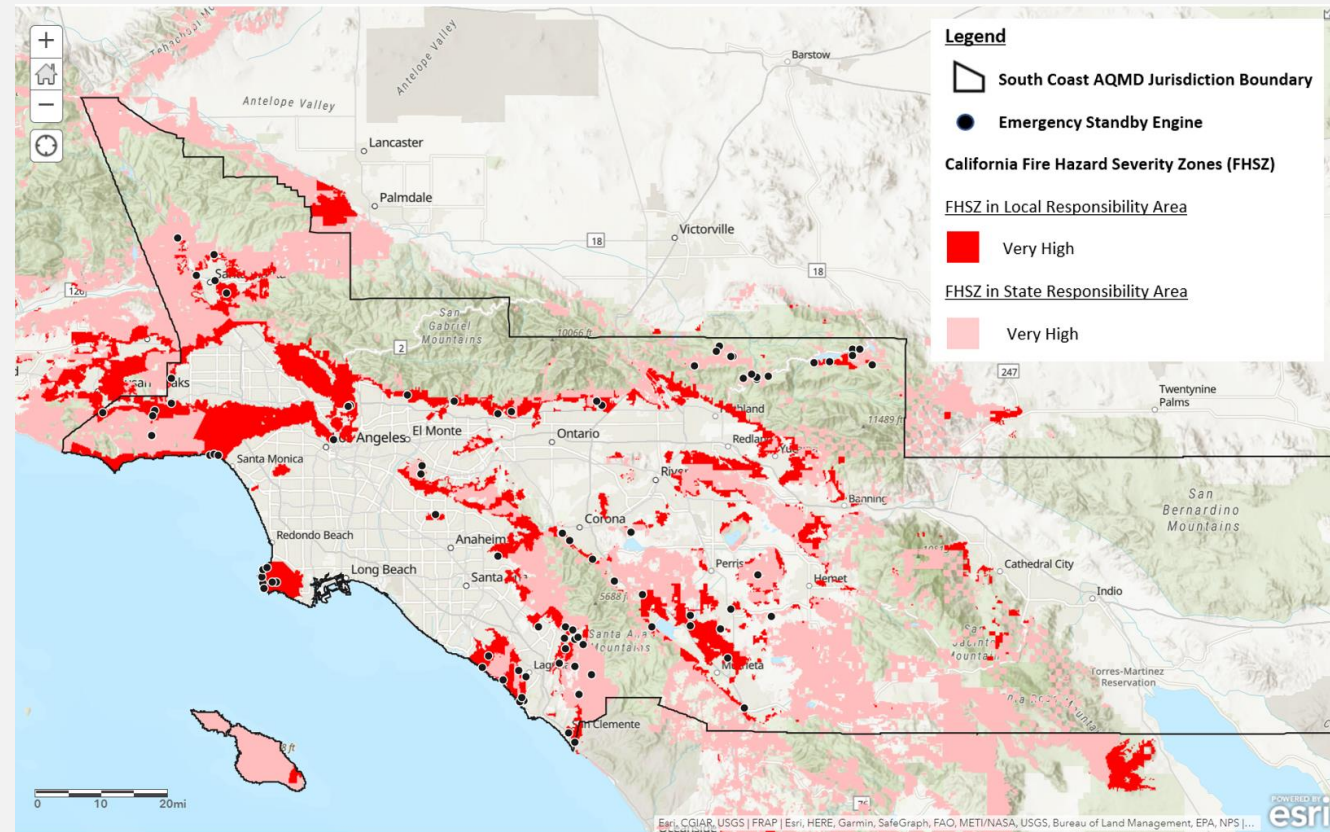
Affected PR 118.1 Facilities

- Approximately 2,560 facilities meet the definition of a critical facility
- From these facilities, there are approximately 3,434 emergency standby engines
- Number of engines exceeding permit limits is unknown due to the unknown number of future PSPS events
- In 2020, three PSPS-related variance requests were submitted for a total of four engines



Affected PAR 1470 Facilities

- Up to an estimated 359 emergency engines are limited to 20 maintenance and testing hours at water and sewage facilities
- Of the 359 engines, 94 emergency engines are in a very high fire hazard severity zone
- Staff is aware of approximately two facilities, representing less than 15 engines that are expected to implement the provision



California Environmental Quality Act

California Environmental Quality Act (CEQA)

- The proposed project (PR 118.1 and PAR 1470) is comprised of specific actions to prevent or mitigate an emergency and has no activities that would cause a significant adverse effect on the environment.
- The proposed project is exempt from CEQA and a Notice of Exemption will be prepared pursuant to:
 - CEQA Guidelines Section 15269 (c) – Emergency Projects, which exempts specific actions necessary to prevent or mitigate an emergency; and
 - CEQA Guidelines Section 15061 (b)(3) – Common Sense Exemption, which exempts activities where it can be seen with certainty that there is no possibility that the activities may have a significant adverse effect on the environment

Key Dates



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