



Working Group Meeting #3

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

May 27, 2021

1:30 PM

Join Zoom Webinar

<https://scaqmd.zoom.us/j/97068064593>

Zoom Webinar ID: 970 6806 4593

Teleconference Dial-In: +1 669 900 6833

Agenda

Previous Working Group Meeting Summary

PR 118.1 Rule Language

PAR 1470 Update

Next Steps

WG Meeting #2 Summary

- Provided 2020 Hearing Board activity for engines exceeding 200 hours per year
- Discussed the Public Safety Power Shutoff (PSPS) event notification process used by Southern California Edison in further detail and provided updated data on events (2018-2020)
- Presented concept for Proposed Rule (PR) 118.1 to allow exclusion of emergency standby engine hours during PSPS events
 - Up to 3 hours for each PSPS imminent shutoff notice; AND
 - All hours during de-energization period (includes hours for repairs due to a PSPS event)
- Provided update on Proposed Amended Rule (PAR) 1470 discussions with the California Air Resources Board (CARB)

Proposed Rule Language

PR 118.1 - Public Safety Provisions for
Stationary Emergency Standby Engines

PR 118.1 – Overview

- PR 118.1 includes optional provisions to exclude qualifying emergency engine hours
 - Qualifying emergency engine hours include actions associated with a PSPS event such as imminent shutoff notifications, de-energizations and repairs
- Proposed rule format includes the following sections:
 - Purpose
 - Applicability
 - Definitions
 - Provisions for Exempting Qualifying Events
 - Notifications
 - Recordkeeping

PR 118.1 – Purpose and Applicability

- Purpose: To exempt use of emergency standby internal combustion engines due to a qualifying event
- Applicability: Applicable to an owner or operator of an emergency standby engine located at a critical service facility

Definition of Critical Service Facilities

- Critical service facilities include:

- Sewage treatment facilities which are publicly owned or operated, prisons, police facilities, fire fighting facilities, schools, hospitals, landfill gas control or processing facilities, water delivery operations, and public transit

Essential public services from Rule 1302

- Natural gas delivery facilities
- Health care facilities as defined in Section 1250 of the California Health and Safety Code
- Facilities used exclusively for telecommunications including radio and cell towers

Additional critical service facilities as suggested by Working Group

Critical Service Facilities Discussion

- Critical service facility definition based on South Coast AQMD essential public services (Rule 1302 definition) PLUS stakeholder input
- Water delivery operations include facilities that deliver potable water
- Seeking stakeholder input

Definition of Emergency Standby Engine

- Engine that operates as a temporary replacement for primary mechanical or electrical power during periods of fuel or energy shortage or while the primary power supply is under repair and has South Coast AQMD permit conditions that limit operation to 200 hours or less per calendar year as determined by an elapsed operating time meter

Definition of Qualifying Event

- Qualifying events are scenarios where emergency standby engine usage is associated with a Public Safety Power Shutoff event
- Public Safety Power Shutoff event is where the utility provider may temporarily turn off power to specific areas as allowed by the California Public Utilities Commission to proactively reduce the likelihood that their infrastructure could cause or contribute to a wildfire

Provisions for Exempting Qualifying Events

- An owner or operator of an emergency standby engine at a critical service facility is exempt from counting operating hours of a qualifying event towards the 200 hour calendar year limitation specified in a South Coast AQMD Permit to Operate or under Rule 1110.2 paragraph (i)(1)(B) provided the owner or operator:
 - Notifies the Executive Officer; and
 - Maintains records

Eligible Operating Hours for Qualifying Events

- Engine operating hours that are eligible to be counted towards a qualifying event include the PSPS event which includes the timeframe beginning on the date and time the power was shutoff to the date and time the power was restored, plus:
 - Up to three additional hours for each imminent shutoff notification
 - Timeframe associated with loss of power due to activities that are directly associated with the PSPS event
 - Can include repair activities of power lines
- If the operating hours of an emergency standby engine exceed 200 hours with the exclusion of a qualifying event for the calendar year, the operator is in violation of the 200 hour per year limitation

Notification of Exceeding 200 hours

- To be eligible to seek regulatory relief under PR 118.1, an owner or operator of an emergency standby engine must notify the Executive Officer:
 - By calling 1-800-CUT-SMOG within 48 hours of when the use of the emergency standby engine exceeds 200 hours for the calendar year (including operating hours during qualifying events)
- If an operator exceeds the 200 hours for the calendar year excluding operating hours during qualifying events no notification is necessary as it would be outside of the scope of PR 118.1

Information Required During Notification

- Facility name
- Facility contact
- Facility Identification Number
- Engine permit number
- Date and time of qualifying event
- Total engine operating hours
- Engine operating hours during qualifying event

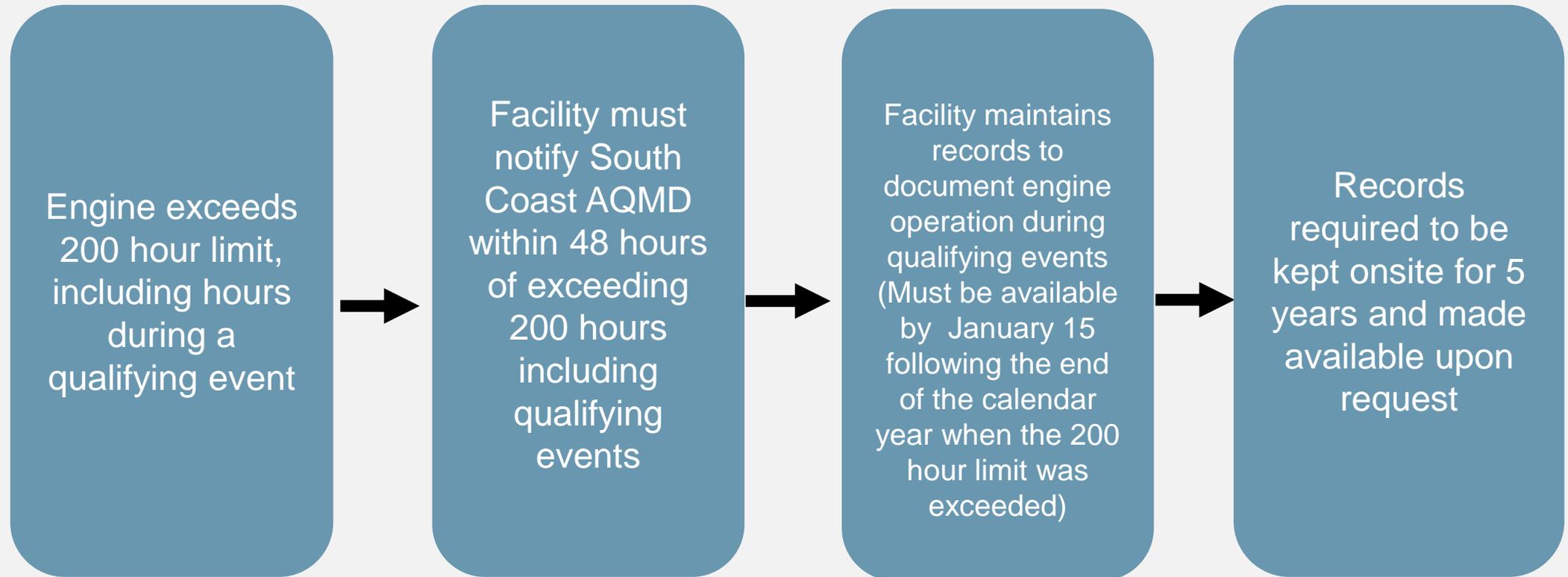
PR 118.1 – Recordkeeping

- Operators of an emergency standby engine that seek regulatory relief through PR 118.1 must maintain records documenting:
 - Operating hours for the calendar year that are not associated with a qualifying event
 - Operating hours for the calendar year that are associated with eligible operating hours for each qualifying event
 - Supporting documentation for eligible operating hours for each qualifying event (next slide provides more details)
- PR 118.1 records must be kept onsite for 5 years and made available upon request
- Operators are not required to submit records, but must have all records documenting eligible operating hours for qualifying events available no later than January 15th following the end of the calendar year when the 200 hour limit was exceeded

PR 118.1 Supporting Documentation

- Required documentation from utility provider to support eligible operating hours for qualifying events will include:
 - Imminent de-energization warning (if applicable)
 - Power de-energization notification
 - Power restoration notification

Summary of Notification and Recordkeeping Process



Update

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

PAR 1470 and the California Air Resources Board's Air Toxics Control Measure

- California Health and Safety Code Section 39666 requires local air districts to implement and enforce California Air Resources Board's (CARB's) Air Toxics Control Measures (ATCMs) or adopt and enforce equally effective or more stringent ATCM requirements than those adopted by the state board
- Rule 1470 implements CARB's ATCM for diesel engines and includes limits on maintenance and testing hours for emergency standby engines
- Staff identified at the past two Working Group Meeting areas where Rule 1470 and 1472 requirements are more stringent than the ATCM for diesel engines
- A water district has commented that additional maintenance and testing hours are needed to ensure reliability for the most restrictive engine category (engines with a PM emission rate > 0.4 g/bhp-hour)
 - Current limit is 20 maintenance and testing hours per year

PAR 1470 Rule Concepts

- Staff is proposing to amend Rule 1470 to allow the option for a water or sewage facility up to 60 hours of maintenance testing hours averaged over a three-year period
 - Total of 60 hours based on three year rolling average
 - Hours in any calendar year cannot exceed 30 hours
- Staff is proposing to limit this provision to water and sewage facilities that are located in a very high fire hazard severity zone (definition on next slide)
- Operators that elect to use this provision must modify their permit

Definition of Very High Fire Hazard Severity Zone

- A very high fire hazard severity zone is a zone 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

► Staff Assessment of PAR 1470 Relative to CARB's ATCM

- Rule 1470 and the ATCM are designed to address diesel particulate emissions which has been determined to be a carcinogen by CARB and the California Office of Environmental Health Hazard Assessment (OEHHA)
- Engine emissions and the estimated cancer risk are based on long-term exposures
 - 30 years for residential and sensitive receptors and 20 years for worker receptors¹
- PAR 1470 will allow fluctuations in annual maintenance and testing hours but does not increase annual average or total operating hours
- By maintaining 60 hours for testing and maintenance activities averaged over three years, the estimated cancer risk remains the same as Rule 1470 and the ATCM
- CARB staff has expressed concerns with PAR 1470 equivalency to the ATCM – South Coast AQMD staff will continue to work with CARB

¹ OEHHA 2015 Guidance Manual for Preparation of Health Risk Assessments

Next Steps

- Next Working Group Meeting
 - Present PR 118.1 Rule language
 - Provide update on PAR 1470 discussion with CARB and present PAR 1470 Rule language

Rule Contacts

Proposed Rule 118.1 and Proposed Amended Rule 1470

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