

Rule 333 Compliance Plan Guidelines

The purpose of the compliance plan is to identify engines which are subject to Rule 333, and describe how they will be brought into compliance with the rule. These guidelines describe who is required to submit a compliance plan due to the revisions of Rule 333 and what information must be submitted with a complete compliance plan. These guidelines are meant to supplement Rule 333.

Who Is Required To Submit a Compliance Plan?

Any operator of an internal combustion engine which is either newly subject to the emission limits of Rule 333, or an internal combustion engine which has become subject to stricter emission limits, is required to submit a compliance plan. Plans must be submitted to the APCD for approval within six months of Rule adoption, except for sources located on offshore platforms on the Outer Continental Shelf (OCS). For sources located on the OCS, a compliance plan must be submitted to the APCD for approval within six months of the Rule adoption into the Part 55 OCS regulations. Operators of existing engines which currently have permits enforcing the requirements of Rule 333, and which are not subject to any stricter emission limits due to the revision to the rule, are not required to submit a compliance plan. Compression ignition emergency standby engines, as defined by the stationary diesel ATCM, are not subject to Rule 333 and operators of those engines do not need to submit a compliance plan. Also, engines which are exempt from permit under the provisions of Rule 202 are not subject to Rule 333, and operators of those engines do not need to submit a compliance plan.

Example 1: Since the NO_x emission standard for compression ignition and dual-fuel engines has become more stringent and new ROC and CO limits were adopted, all operators of compression ignition and dual fuel engines must submit a compliance plan.

Example 2: Operators of spark ignited engines rated from 50 to 100 horsepower are newly subject to the emission standards of Rule 333, therefore they must submit a compliance plan.

What Must Be Submitted With the Compliance Plan?

For each category of engine subject to Rule 333 (rich burn noncyclically-loaded spark ignited, lean burn spark ignited 50 hp or greater but less than 100, lean burn spark ignited greater than 100 hp, rich burn cyclically loaded spark ignited, and compression ignited or dual fuel), there are two pages which must be submitted for the compliance plan. The top of each page lists the category of engine and the Rule emission limits. If you have engines of different categories fill out a separate form for each engine category.

Page 1: On Page 1 list all existing engines at the stationary source which are subject to permit or have become subject to permit due to the revisions to Rule 202, including engines that are currently subject to Rule 333. Identify the engine, list the location it is operated, list how many hours the engine operated in

2007, describe how the engine will be brought in to compliance with Rule 333. In the final column mark whether the engine is currently derated to less than 50 hp or operates less than 200 hours per year.

If an engine is currently derated below 50 hp and is under APCD permit it is exempt from the emission standards of Rule 333. Unpermitted derated engines are also exempt from Rule 333, but operators of those engines must apply for a Permit to Operate (PTO).

If an engine operates less than 200 hours per year it is exempt from the emission standards of Rule 333. Operators of these engines must install permanent identification on each engine, must equip each engine with a nonresettable elapsed operating time meter, and must maintain a written Engine Exemption Log.

Page 2: Page 2 must be completed by any operator who has engines subject to new or stricter standards of Rule 333 and who has not identified the engines as exempt from emission standards or currently in compliance on Page 1. If the engine already meets the new standards, but it has not been source tested, page 2 must be completed. On page 2 you must identify the typical daily operating schedule of each engine, the total amount of fuel consumed in the previous year, the higher heating value and sulfur content of the fuel, and the stack exhaust temperature. List the best available emissions data for the engine in ppmv @ 15% O₂. Use source test results for each engine if available. If engine-specific source test results are not available list manufacturer-tested emission factors. In the space marked “Proposed Controls” list the proposed modifications to each engine (install air-fuel ratio controller, non selective catalytic reduction, pre-combustion chamber, etc). Engines which already meet the emission limits of Rule 333, but have not been source tested, may not need to be modified, but they will need to be source tested; for those engines write “source test” under “Proposed Controls”. For engines which are being source tested, but not modified, an ATC is not required. Tier-certified (Tier 1, 2, 3, or 4) compression ignition engines do not need to be source tested. For “Compliance Action Date” mark the date that the engine will be modified, replaced, or derated. For “ATC Submittal Date” mark the date by which you will submit an ATC application; an ATC application must be submitted within one year of the date of Rule adoption for any engines being modified. For “Source Test Date” list the date by which you will conduct a source test to demonstrate compliance with the Rule limits. A source test is required within two years of the date of Rule adoption, except for Tier-certified compression ignition engines. If you will comply by derating the engine below 50 hp, or by limiting operation to less than 200 hours per year, a source test is not required. If the exhaust stack must be modified in order to facilitate source testing or continuous in-stack monitoring submit a description and drawing of the proposed stack modifications.

Deadlines					
Attach Identification to Engine	Submit Compliance Plan	Install Hour Meter (Low Use Engines)	Install Hour and Fuel Meter (All Other Engines)	Submit ATC Application	Source Test
7/19/2008	12/19/2008	12/19/2008	3/19/2009	6/19/2009	6/19/2010