

**Q1:** I have an engine with a portable registration; do I need to submit a compliance plan for Rule 333?

**A1:** Only if the registered engine is subject to an APCD permit. Typically engines registered in the Statewide Registration Program are exempt from permit and are not subject to Rule 333. However, in certain cases a portable registered engine may be an integral part of the stationary source and require an APCD permit.

**Q2:** I have ten spark ignited 49 brake horsepower engines, if I derate the engines so that the total rated brake horsepower is less than 400, do the engines need a permit?

**A2:** Yes, you need a permit. To determine if the total rating of all your engines rated between 20 and 50 hp is less than 400 hp, the manufacturer's original horsepower ratings are used.

**Q3:** I have two engines each with a manufacturer's rated brake horsepower rating of 75 and both have been derated to 45 brake horsepower, do these engines count towards the 400 horsepower limit for engines rated between 20 and 50 hp?

**A3:** No, the two engines require permits, but they are not subject to Rule 333 and they do not count towards the 400 horsepower limit for engines rated between 20 and 50 hp.

**Q4:** I have a permit-exempt spark ignited engine that is limited to less than 200 hours per year and is used exclusively for emergency electrical power generation, or emergency pumping of water for flood control, or for firefighting. If I operate more than 200 hours in a year, what do I need to do?

**A4:** If the engine operates more than 200 hours in a year it no longer qualifies for the permit exemption. You must apply for and receive an ATC from the District prior to exceeding the yearly hours limit.

**Q5:** I have a permitted engine that is limited to less than 200 hours per year in order to qualify for the exemption from Rule 333. If I might operate more than 200 hours in a year, what do I need to do?

**A5:** If you will use the engine more than 200 hours per year in future years you will need to modify your permit to allow more hours of operation; the engine will become subject to the requirements of Rule 333. If you need to operate the engine more than 200 hours in a year because of extraordinary circumstances, and you think this will be a one-time event, you should contact District staff and discuss your options before exceeding the limit. Note: Exceeding 200 hours may result in enforcement action.

**Q6:** I have ten spark ignited engines at my stationary source, each with a manufacturer's rated brake horsepower rating of 45. Since my total rated brake horsepower rating for all ten engines is 450, can I avoid having to permit all ten engines by derating three of engines from 45 brake horsepower to 25 brake horsepower so that my total aggregate brake horsepower rating at the stationary source is reduced to 390, thereby staying below the 400 horsepower aggregate?

**A6:** No, all ten engines are required to be permitted because their aggregate brake horsepower (450) exceeds the permit exemption limit (400 brake horsepower or greater). No spark ignition engine otherwise subject to permit shall be exempt from permit because it has been derated.

**Q7:** Do I need to submit a new Inspection and Maintenance Plan for APCD approval?

**A7:** An entirely new plan is required if an operator is becoming subject to engine I&M requirements for the first time, or if the existing Plan needs significant revision. An amended plan is necessary if new engines have become subject to Rule 333, or if carbon monoxide (CO) monitoring is not addressed in an approved APCD Plan. If a new or amended plan is not submitted, existing plans need to be resubmitted to the APCD for review to ensure they satisfy the Rule 333 requirements.

**Q8:** Do I need to submit a Compliance Plan for APCD approval?

**A8:** 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.

**Q9:** What is the deadline for Compliance Plans and Inspection and Maintenance Plan submittals to APCD?

**A9:** The deadline is December 19, 2008 for all sources except those on the OCS. For sources located on the Outer Continental Shelf (OCS), Compliance and I&M Plans must be submitted to the APCD for approval by May 21, 2009.

**Q10:** I have 11 spark ignited IC engines rated between 20 and 50 bhp at my stationary source, with a total rating of over 400 brake horsepower. These 11 engines are already included in a District PTO (per Rule 202.F.1.f). If I add two new engines rated between 20 and 50 bhp, do these need a permit?

**A10:** Yes. Once the total rating of spark ignited IC engines between 20 and 50 bhp at your stationary source is greater than 400 bhp, an ATC is required to install any new spark ignited engine rated between 20 and 50 bhp.

**Q11:** I have 11 spark ignited IC engines rated between 20 and 50 bhp at my stationary source, with a total rating of under 400 brake horsepower. What are the permit requirements if I add a new SI engine rated between 20 and 50 bhp and the resulting aggregate will exceed 400 bhp?

**A11:** An ATC permit is required prior to the installation of the new engine. The ATC will list the existing engines, but they will not become subject to permit until the PTO is issued for the new engine.

**Q12:** What are the acceptable methods for monitoring the use of engines rated between 20 and 50 bhp?

**A12:** The following methods may be used to monitor the use of engines subject to permit but exempt from Rule 333. The method chosen must be approved by the APCD in each case. The annual emissions fee will be based on actual emissions from the engines, calculated using the monitoring scheme approved.

1. Individual fuel meters on each engine.
2. A field-wide fuel meter to measure total fuel use and individual hour meters on each engine to apportion the total fuel use among the engines.
3. A field-wide fuel meter to measure total fuel use and DOGGR records of days of individual well operation to apportion the total fuel use among the engines.
4. Individual hour meters on each engine. It will be assumed each engine operates at full load during each hour of operation.
5. If no hour or fuel meters are installed it will be assumed each engine operates at full load 8760 hours per year.

**Q13:** If I have a spark ignited emergency backup engine that is operated less than 200 hours per year, how do I need to record its hours of operation to show it is exempt from permit?

**A13:** You must install a nonresettable elapsed operating time meter and maintain the meter in proper operating condition to demonstrate you qualify for the exemption. You must maintain a record of the number of hours of operation each day the engine is operated and the cumulative hours of operation each year.

**Q14:** Can I bring an engine to my facility for a temporary project using the Temporary Equipment exemption of Rule 202.D.5?

**A14:** No. An engine rated 50 bhp or more must either be permitted with the APCD or registered in the Statewide Portable Equipment Registration Program (PERP) unless it qualifies for one of the engine-specific exemptions of Rule 202.F.6. 202.F.6 states that an engine is not exempt from permit unless it qualifies for an engine-specific exemption under the provisions of Rule 202.F.

**Q15:** Can I bring a PERP-registered engine to my facility?

**A15:** Typically PERP-registered engines may only be operated at a facility for limited jobs unrelated to the main operations of the facility. A PERP-registered engine may **not** be operated at a facility if any of the following are true:

- The engine will be attached to a foundation or will remain at the facility for more than 12 consecutive months; or
- The engine is performing a seasonal function at a facility that will be repeated in subsequent years, either by the same engine or another engine; or
- The engine will only be moved from one location to another to meet the 12 month residence time limit; or
- The engine is subject to an applicable federal Maximum Achievable Control Technology standard, or National Emissions Standard for Hazardous Air Pollutants, or federal New Source Performance Standard, except for equipment units subject to 40 CFR Part 60 Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants); or
- The engine is used for a dredging operation in Santa Barbara Harbor; or
- The engine provides power into the grid, unless it is only used to maintain grid stability during an emergency event; or
- The engine provides power to a process at a stationary source permitted by the district, or to a building, facility, or stationary equipment, unless the engine is only used to provide primary or supplemental power during one of the following situations:
  - an unforeseen interruption of electrical power from the serving utility,
  - a maintenance or repair operation,
  - an electrical upgrade operation including startup, shutdown, and testing that does not exceed 60 calendar days,
  - an operation where the voltage, frequency, or electrical current requirements can only be supplied by a portable generator,
  - a remote operation where grid power is unavailable; or
- The engine is determined by the air pollution control officer to qualify as part of a stationary source permitted by the APCD; or
- Notwithstanding the above, the air pollution control officer determines that the engine, as used, is subject to district regulations, including New Source Review.

Some situations where PERP-registered engines may be brought to a stationary source are: bringing woodchippers to an oil and gas processing plant to clean up downed limbs on the property, bringing portable air compressors to a site for pressure washing a building, bringing engines on-site while resurfacing a roadway or parking lot, bringing portable drilling units or well work over rigs to oil fields, or bringing an emergency standby engine to a facility in response to an unforeseen power outage.

Some situations where PERP-registered engines may not be brought to a stationary source without APCD-approval are: bringing a portable generator to a facility to temporarily replace a permitted emergency backup engine that is out of service for repairs (except as allowed by replacement provisions specified in the permit), bringing a woodchipper to a facility that stores and chips wood, bringing an engine to power a pumping unit at an oilfield, bringing an emergency standby engine out to the same site every year, or bringing a jackup rig, drillship, or semi-submersible drilling rig into county waters.

If you are unsure of whether a PERP-registered engine may be brought to your facility under the PERP registration, you should contact the District with the specifics of your case.