



FAQ: Diesel Engine Permitting and ATCM
DATE: October 10, 2016
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Hour Limits

Q: *Does the District limit the maintenance and testing operations for emergency standby diesel to those limits identified in the ATCM?*

A: Yes. The Maintenance & Testing (M&T) hours are directly tied to the Diesel PM Standards in the ATCM. It is important that the operator keeps within the annual M&T hours for their engine(s) to ensure compliance with the ATCM and to not create an unmitigated health risk to the public. New ES diesel generator engines get 50 hours per year of M&T operations under the ATCM

Q: *Does the District allow for unlimited use for emergency occurrences?*

A: The ATCM allows for unlimited usage of a diesel E/S engine during emergencies. The ATCM clearly defines what emergency use is (see definitions of “Emergency Standby Generator” and “Emergency Use”) and under what conditions the engine can be operated. The APCD will enforce the emergency operation provisions of the ATCM and will allow unlimited emergency use as that term is defined in the ATCM.

Exemptions

Q: *Are engines that are totally exempted under the diesel Airborne Toxic Control Measure (ATCM) also exempt from District permits?*

A: Not necessarily. To be exempt from District permit, the engine needs to be rated below 50 bhp or have a specific exemption listed in Rule 202. This rating is based on the manufacturer’s rating at the time the engine was manufactured. Units de-rated under 50 bhp after leaving the manufacturer are not exempt from permit unless one of the other Rule 202 exemptions apply. Example exemptions include:

- CI Engines used to provide motive power for on-road and off-road vehicles (202.F.1.c)
- CI Engines used for the propulsion of marine vessels or associated auxiliary engines used on the marine vessel (202.F.1.b)
- Engines used in aircraft and in locomotives (202.F.1.a)
- Spark-ignited backup generator engines (202.F.1.d)

- CI Engines used for construction activities (202.F.3)
- CI Engines used for aircraft shows or amusements rides (202.F.4)

Section (c) of the ATCM addresses exemptions from the regulation.

Q: *Do I need a District permit if I use engines that registered in the State's Portable Engine Registration Program (PERP)?*

A: Most engines registered in the PERP do not require a District permit. This would include construction engines (e.g., welders) and engines brought to a site for maintenance activities (e.g., wood chippers). See Section 2451(c) of the ATCM for uses that are not eligible for the PERP program. Some cases occur where the District determines that use of the portable engine is part of a stationary source requiring permits from the District. Examples include: materials recycling facilities that utilize portable diesel crushers, screens and stacker belts (e.g., scrap metals, construction and demolition waste, asphalt, concrete). See our FAQ for more discussion: <https://www.ourair.org/wp-content/uploads/PERPfaq.pdf>

Q: *Will a source that is currently exempt based on the 202.D.7 "one-ton exemption" lose their exemption if they install a new diesel ES generator rated at or over 50 bhp?*

A: Yes, having equipment subject to a State ATCM will nullify the stationary source exemption.

NSR Issues

Q: *Will the District require an AQIA for E/S engines?*

A: Yes, an AQIA will be required if the project PTE exceeds the AQIA thresholds in Table 4 of Rule 802 or if the District determines that an AQAI is required. This will look at compliance with short-term AAQS and Increments. By default, the District assumes a 2-hr/day and 50 hour/yr maximum operating scenario for new E/S engines doing testing and maintenance. Applicants may request a different daily value.

Q: *Do I need to offset the emissions from a ES engine if my sources exceeds the offsets thresholds of Table 3 in Rule 802?*

A: No. Rule 802.B.4 exempts emergency standby generator, flood control, and firewater pump piston-type internal combustion engines from the offset requirements of NSR.

Miscellaneous

Q: *What if my ES engine or firewater pump breaks? Can I replace it temporarily while my permitted unit is repaired?*

A: Yes, each permit contains special conditions that addresses this situation.