PORTABLE DIESEL ENGINE: PAST DUE FLEET EMISSION AND REPORTING REQUIREMENTS – UPCOMING ENFORCEMENT ACTION

In December of 2012, the APCD issued an advisory for owners and operators of portable diesel engines. The advisory was issued to help owners/operators of portable diesel engines understand and comply with the state’s Airborne Toxic Control Measure (ATCM) for Diesel Particulate Matter from Portable Engines and to advise them of the January 1, 2013 deadline related to fleet emission requirements for portable diesel engines. The advisory informed owners and operators that, pursuant to the ATCM, they must submit a report to the California Air Resources Board (CARB) no later than March 1, 2013, that contains a statement of compliance and documents how their portable diesel engine fleets comply with the applicable fleet emission standard.

FLEET EMISSION REPORTING

According to CARB records, there is still, a large number of companies that have not submitted the required report(s). CARB has referred the non-reporting companies to local air districts, including the Ventura County Air Pollution Control District, (APCD) for enforcement action.

If you have not submitted the required fleet emission report(s), you will be subject to enforcement action and associated penalties. The APCD will begin enforcement by issuing Notices of Violation to individuals and companies that have failed to submit the required report. This requirement applies to all portable diesel engine fleets whether the engines are registered with the Statewide Portable Engine Registration Program (PERP), or operating under an APCD Permit to Operate. Additionally, a “fleet” can be as small as one engine. No portable diesel engine is exempt.

To avoid enforcement action, owners/operators of portable diesel engines must submit a statement of compliance to CARB, documenting how their portable diesel engine fleets comply with the applicable fleet emission standard.

All statements of compliance should be mailed to:

ARB/PERP
P.O. Box 2038
Sacramento, CA 95812

FLEET AVERAGE EMISSION LIMIT

Beginning January 1, 2013, portable diesel engines registered under the PERP or permitted by any local air district, must comply with the fleet emission standard for that engine size category. Future fleet emission standard compliance dates are January 1, 2017 and January 1, 2020. Fleet owners should plan ahead for those dates as well.

The following table contains weighted particulate matter fleet average emission limits expressed as grams per brake horsepower-hour (g/bhp-hr) by the listed compliance dates:
Owners and operators of portable diesel engine fleets that do not comply with the applicable January 1, 2013 fleet average emission limits should also be aware that CARB has referred the companies with non-complying fleets to the local air districts, including the APCD for enforcement action as well.

If your fleet does not comply with the applicable fleet average emission limit, you may be subject to enforcement action and associated penalties. The APCD may be issuing Notices of Violation to individuals and companies with fleets that do not comply. Again, this requirement applies to all portable diesel engine fleets whether they are registered with the Statewide Portable Engine Registration Program (PERP), or operating under an APCD Permit to Operate.

The ATCM defines a “fleet” in part as “…a portable engine or group of portable engines that are owned and managed by an individual operational entity such as a business, business unit within a corporation, or individual city or state department under the control of a Responsible Official.”

For more information regarding the fleet average emission requirements, your reporting/recordkeeping responsibilities and how to count engines and calculate the weighted PM fleet average for your fleet, please see the attached CARB pamphlet.

You may download a PDF copy of the pamphlet in English or in Spanish at:  
http://www.arb.ca.gov/portable/portable.htm

You may download a PDF copy of the portable diesel engine ATCM from CARB at:  
http://www.arb.ca.gov/diesel/peatcm/peatcm.htm

In order to comply with the ATCM, owners/operators of portable diesel engine fleets must submit all required reports and comply with all applicable fleet average emission limits.

If you have any questions regarding the APCD’s enforcement of the portable diesel engine ATCM, please contact the District’s Compliance Division at 805/645-1494.

<table>
<thead>
<tr>
<th>Fleet Standard Compliance Date</th>
<th>Engines &lt;175 hp (g/bhp-hr)</th>
<th>Engines 175 to 750 hp (g/bhp-hr)</th>
<th>Engines &gt; 750 hp (g/bhp-hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/1/2013</td>
<td>0.3</td>
<td>0.15</td>
<td>0.25</td>
</tr>
<tr>
<td>1/1/2017</td>
<td>0.18</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>1/1/2020</td>
<td>0.04</td>
<td>0.02</td>
<td>0.02</td>
</tr>
</tbody>
</table>
Important Information

1. Fleet emission requirements apply to portable engines registered with Portable Equipment Registration Program or operating under air district permits.

2. Be proactive-Check compliance with fleet emission requirements promptly. This will allow time to adjust your fleet before the January 1, 2013, deadline.

3. Fleet emission requirements will become more stringent in January 2017 and 2020. Plan accordingly.


5. If you need help, call (916) 324-5869 or e-mail portable@arb.ca.gov.

(12/6/12)
Portable Diesel Engines 2013 Fleet Requirements

Beginning January 1, 2013 portable diesel engines registered in PERP or operating under air district permits must comply with weighted particulate matter (PM) emission fleet averages expressed as grams per brake horsepower-hour (g/bhp-hr). These requirements are part of the Airborne Toxic Control Measure (ATCM) for diesel PM from portable engines. You can have up to three different fleets depending on the size of the engines in your inventory. The ATCM has emission standards for each fleet depending on engine size range. The table below shows the standards effective January 1, 2013.

<table>
<thead>
<tr>
<th>Engine Size Category in Fleet</th>
<th>50 to less than 175 hp</th>
<th>175 to 750 hp</th>
<th>Greater than 750 hp</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weighted PM Fleet Average</td>
<td>0.3 g/bhp-hr</td>
<td>0.15 g/bhp-hr</td>
<td>0.25 g/bhp-hr</td>
</tr>
</tbody>
</table>

How to Determine Compliance?

Determine the weighted PM emissions averages for all the engines within each of the three categories to check if the emissions comply with the applicable standard. This can be done by using ARB’s Fleet Calculator (on line or downloadable) or by calculating the weighted PM emissions yourself. You will need engine family name and horsepower of each engine. Refer to your registration or district permit. Other exemptions such as emergency engines, low use engines may apply. Refer to the ATCM.

How to use the ARB Fleet Calculator:

1. Exclude engines below 50 horsepower.
2. Group remaining inventory into three categories based on horsepower in the above table.

How to calculate weighted PM fleet average yourself:

2. Use the following formula to determine compliance with each fleet standard:

\[
\frac{(bhp \times E.F.)_{\text{1st engine}} + (bhp \times E.F.)_{\text{2nd engine}} + \ldots (bhp \times E.F.)_{\text{n}}}{(bhp_{\text{1st engine}} + bhp_{\text{2nd engine}} + \ldots bhp_{\text{n}})}
\]

Where: \(bhp = \text{maximum rated horsepower}, \ E.F. = \text{diesel PM emission rate}, \text{and} \ n = \text{the number of engines in the category}

If your fleet average emissions are above the standard YOU must clean up your fleet by using the following options:

1. Replace older, dirtier engines with newer, cleaner engines
2. Replace diesel engines with electric power
3. Install add on controls to engines such as an approved diesel particulate filter (DPF)

Report to ARB by March 1, 2013

What must be reported?

☐ Statement of compliance by responsible official
☐ Summary of each engine in fleet with the emission rate
☐ Engine make, model, serial # and year
☐ Low use and emergency engines
☐ PERP registration number or district permit numbers