

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**FEDERAL SUBPART ZZZZ – NATIONAL EMISSIONS STANDARDS
FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY
RECIPROCATING INTERNAL COMBUSTION ENGINES**

WORKSHOP REPORT

A workshop notice concerning implementation of Federal Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP) was mailed to all owners or operators of nonemergency stationary engines permitted by the District. Notices were also mailed to all Economic Development Corporations and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties. The workshop was held on January 30, 2013, and was attended by 78 persons. The workshop comments and District responses are as follows:

1. WORKSHOP COMMENT

Does the RICE NESHAP apply to portable engines at my facility?

DISTRICT RESPONSE

No, the RICE NESHAP applies only to stationary engines as defined in 40 CFR 63.6675.

2. WORKSHOP COMMENT

Are stationary engines rated under 50 horsepower (hp) subject to the RICE NESHAP?

DISTRICT RESPONSE

Yes, all stationary engines, as defined in 40 CFR 63.6675, are subject to the RICE NESHAP requirements.

3. WORKSHOP COMMENT

I operate a Title V facility and must document that the facility complies with all applicable federal requirements. If the facility has stationary engines under 50 hp that do not have a District permit to operate (PTO), how do I meet this requirement?

DISTRICT RESPONSE

The District will revise affected Title V permits to incorporate applicable requirements of the RICE NESHAP, including maintenance and recordkeeping requirements of stationary RICE

rated less than 50 hp, as applicable. This Title V permit revision will occur at the time of Title V permit renewal or the next Title V permit action, whichever is sooner. Compliance with all Title V permit requirements, including the applicable RICE NESHAP requirements, is certified by the facility in their required periodic compliance certification and compliance reports.

4. WORKSHOP COMMENT

Will PTOs be required for stationary engines under 50 hp that are located at facilities that are not subject to Title V requirements?

DISTRICT RESPONSE

No, the District does not plan to require PTOs for these engines. However, records should be maintained to demonstrate compliance with all applicable RICE NESHAP requirements. District Rule 11 – Exemptions from Rule 10 Permit Requirements, is currently being updated to clarify exemptions from permit requirements.

5. WORKSHOP COMMENT

Can the District determine if my facility is a Major Source or an Area Source of hazardous air pollutants (HAP)?

DISTRICT RESPONSE

No, the District can provide assistance, but each facility must determine if it is a Major or Area Source of HAP. A Major Source, as defined in 40 CFR 63.6675, is a facility that emits or has the potential to emit considering controls, 10 tons per year (tpy) or more of any HAP, or 25 tpy or more of any combination of HAP. An Area Source is any source that is not a Major Source.

6. WORKSHOP COMMENT

A permit modification application must be submitted for what types of stationary engines?

DISTRICT RESPONSE

A permit modification application is required for any non-emergency stationary engine subject to an emission limit pursuant to the RICE NESHAP. This includes diesel engines greater than 300 hp, 4-stroke lean burn and 4-stroke rich burn engines greater than 500 hp (other than landfill gas or digester gas engines), and engines that commenced construction after 6/12/2006.

7. WORKSHOP COMMENT

I have a stationary engine subject to a RICE NESHAP emission limit. What steps must I take to ensure my engine and PTO meet the RICE NESHAP requirements?

DISTRICT RESPONSE

First, an engine owner should determine what equipment and/or operational modifications will be needed to comply with the RICE NESHAP requirements. Then, submit a permit modification application and applicable fees detailing the proposed modifications. A District permit engineer will evaluate the application and, when the proposed modifications are approved, issue an Authority to Construct (ATC) with updated permit conditions. Once the modifications are complete and the equipment passes final inspections and/or source tests, the final PTO will be issued.

8. WORKSHOP COMMENT

How will permit conditions be modified to reflect continuous monitoring system requirements of the RICE NESHAP?

DISTRICT RESPONSE

Engines that require a continuous monitoring system to comply with the RICE NESHAP are subject to an emission standard and the engine owner will need to submit a permit modification application. Permit conditions will be revised to reflect all RICE NESHAP requirements applicable to the permitted engine.

9. WORKSHOP COMMENT

How many engines will require a continuous emission monitoring system (CEMS)?

DISTRICT RESPONSE

The number of engines that require a CEMS is currently unknown because many affected engines have alternate compliance options, such as a continuous parameter monitoring system (CPMS).

10. WORKSHOP COMMENT

Is there a list of certified engine modifications to demonstrate RICE NESHAP compliance?

DISTRICT RESPONSE

No, many factors need to be considered, and therefore each engine represents a unique situation and often there are multiple engine modification options to comply with the RICE NESHAP.

11. WORKSHOP COMMENT

Does compliance with the ARB verified diesel emission control strategies ensure compliance with the RICE NESHAP?

DISTRICT RESPONSE

No, the RICE NESHAP is a federal regulation promulgated by EPA, whereas the ARB verified diesel emission control strategies ensure compliance with a California state regulation.

12. WORKSHOP COMMENT

A workshop handout listing estimated fees has been provided. Is this the estimated cost to modify the engine to comply with the RICE NESHAP?

DISTRICT RESPONSE

No, the fees indicated on the workshop handout are an estimate of District labor costs to modify the PTO and, if applicable, an estimate of District labor costs of the source test fee.

13. WORKSHOP COMMENT

Will I be required to monitor for other regulated compounds during the RICE NESHAP source test?

DISTRICT RESPONSE

Yes, all regulated compounds will be measured during the source test and must comply with applicable emission limits.

14. WORKSHOP COMMENT

What is the cost for the District to witness a source test conducted by a third party?

DISTRICT RESPONSE

The cost will be based on time and materials to witness the source test, and will need to be determined on a case by case basis. Contact the District for a fee estimate.

15. WORKSHOP COMMENT

If a source test has been previously conducted, will I need to conduct an additional source test to comply with the RICE NESHAP?

DISTRICT RESPONSE

An additional source test will be required for compliance with the RICE NESHAP, unless the previously conducted source test meets all requirements of 40 CFR 63.6610 or 40 CFR 63.6612, as applicable. Generally, this means the test was conducted using the applicable test methods, the test is less than two years old, the test was conducted or witnessed by the District, no process or equipment changes have been made to the engine and related control equipment, the test was performed at the required engine load condition (if any), and all regulated compounds were properly measured and comply with the applicable limits.

16. WORKSHOP COMMENT

I operate an engine that is subject to a carbon monoxide (CO) emission limit under the RICE NESHAP. If I install a CO control device and it also reduces other criteria pollutant emissions, may I request emission reduction credits (ERCs)?

DISTRICT RESPONSE

ERCs are associated with emission reductions that are surplus to existing regulated limits and meet the requirements of District Rules 26.0 through 26.10. Contact the District for more information on the ERC program.

17. WORKSHOP COMMENT

Does the ERC application need to be submitted concurrently with the RICE NESHAP permit modification application?

DISTRICT RESPONSE

No, although the ERC application submission is time sensitive and the timing can affect the generation of credits.

18. WORKSHOP COMMENT

Where can I find information on District Rules?

DISTRICT RESPONSE

On the District's website: <http://www.sdapcd.org/rules/rules.html>

19. WORKSHOP COMMENT

How does the District compile the contact list to identify stationary engines subject to the RICE NESHAP regulation?

DISTRICT RESPONSE

The District compiled a contact list for engine owners subject to the RICE NESHAP requirements based on the existing inventory of PTOs issued by the District.

DSR:jl
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