

Procedure for Offshore Use of Portable Engines

This procedure document clarifies the requirements for the operation of portable engines offshore of Santa Barbara County. APCD Rule 202.F.2 (see <http://www.sbcapcd.org/rules/download/rule202.pdf>) allows operation of portable engines registered in the statewide Portable Equipment Registration Program (PERP) in State Territorial Waters (STW) or over the Outer Continental Shelf (OCS) without a District permit as long as all requirements of the PERP regulation that pertain to STW are followed.

Which engines need to be registered?

APCD Rule 202 (Exemptions to Rule 201), modified on 6/19/2008, no longer contains an exemption for drilling equipment. Any portable engine rated equal to or greater than 50 brake horsepower needs to be either permitted with the APCD or registered in the statewide PERP unless it qualifies for another Rule 202.F permit exemption. This applies to compression ignition (e.g. diesel) and spark ignition engines. Engines located on a platform for more than 12 consecutive months are not eligible for the PERP program.

How do I register my engines in the PERP?

The registration application forms are at <http://www.arb.ca.gov/portable/portable.htm>. Be sure to check the box on the application form stating you intend to use the engine in State Territorial Waters; this ensures that the offshore requirements of the PERP regulation appear on your registration. Any portable engine, including a Tier 0 engine, located on an OCS platform on 11/21/2008 can be registered in the PERP as a resident engine. State the engine is a resident engine that is being registered due to loss of permit exemption because of a change in local district rules on the application form.

What do I need to do before operating PERP engines offshore?

The PERP regulation requires you to notify the APCD at least 14 days before operating the engine offshore. The notification form APCD-38P is at <http://www.sbcapcd.org/eng/dl/dl01.htm>. You may start operation once you receive written APCD approval. You do not need to wait for the entire 14 days to elapse before beginning operation if approval has been received from the APCD.

Are there exceptions to the 14-day notification requirement before operating a PERP engine?

Yes, for two cases noted below. In each case notification form APCD-38P still needs to be completed and submitted.

- a) If you have an emergency and need to operate an engine with less than 14 days' notice, you may apply for an emergency variance from the procedural requirements of District Rule 202.F.2. A variance will only be granted in emergency situations. Once you have obtained a variance you may operate the engine, but you must still submit form APCD-38P. Mark on the form that an emergency variance has been granted and provide the variance number.

- b) If you are operating a PERP registered engine and it breaks down and needs to be replaced you may bring in a similar replacement engine with less than 14 days' notice. Mark on the notification form that the new engine will be replacing an existing engine and provide the PERP registration number of the previously approved engine.

Can the APCD require submittal of an AQIA prior to authorizing PERP use offshore?

Yes. If the APCD determines the PERP operations have the potential to cause or contribute to an ambient air quality standard violation an AQIA will need to be submitted for APCD review. We will be working with the offshore platform operators to develop emission threshold levels that will trigger AQIA submittals.