

SBCAPCD STATIONARY DICE ATCM IMPLEMENTATION FAQ (ver 1.1)

The following questions and answers are intended to provide guidance in implementing the Stationary Diesel Airborne Toxics Control Measure. The Air Resources Board has developed a FAQ that addresses similar implementation type questions (www.sbcapcd.org/eng/atcm/dice/arb_atcm_faq.pdf).

- Q1. Fuel Use Log: Our fuel records are kept at a central location and it would be difficult to conform to maintaining these records onsite. May we supply these fuel records to the air district upon request?
- A1. *Section (e)(40(I)(g) of the ATCM details the specific requirements for tracking fuel for in-use E/S engines. Fuel purchase records are required to be maintained. Items (I – V) detail the minimum required records to be maintained. For situations where it is difficult to maintain these records onsite, the APCD will accept the maintenance of these fuel records at a central location as long as (1) the required information is recorded and (2) the information is made readily available (within 2 working days) to the APCD upon request.*
- Q2. APCD Form ENF-92: Can we use our own record keeping forms instead of ENF-92? We use our own standardized generator run log forms throughout the State of California.
- A2. *The APCD has provided Form ENF-92 as a convenience to those operators not inclined to such paperwork tasks. Companies may use their own forms/logs for recording the required information. If done, the company should be very diligent in ensuring that all the required information is recorded.*
- Q3. Records for Remote Sites: For a limited number of remote unmanned sites, the recordkeeping logs may be kept at the closest manned site or central office to the remote site. Is this acceptable?
- A3. *It is acceptable for the records to be kept off-site for engines at remote unmanned locations. These records, however, must be readily available (within 2 working days) and should be brought to the site on announced inspections if requested so by the APCD inspector in advance.*
- Q4. ISC Contracts: My facility is signed up with our electrical utility under an Interruptible Service Contract (ISC). However, we do not use our E/S generator engines during interruptible service. Our facility is enrolled in the program to limit how much power we are allocated to run our critical equipment during interruptible service, but none of our engines are enrolled in the program. Do the ISC provisions of the ATCM apply?

- A4. *The ISC provisions of the ATCM are intended to apply in situations where the engines are enrolled in ISC programs that may require the use of the E/S generator engines. If the electrical utility can require your facility to use your generator engines during a Stage 2 or Stage 3 event as part of the ISC contract, then the ISC provisions of the ATCM apply. If there are no circumstances that require the use of the E/S generator engines under the terms of the ISC contract during Stage 2 or Stage 3 events, then the ISC provisions of the ATCM do not apply. Operators under ISC contracts that do not use their E/S generators during Stage 2 or Stage 3 events are required to sign a negative declaration attesting to that fact.*

- Q5. NFPA Firewater Pumps Hours of Operation: What are the “NFPA” Firewater Pump Engine requirements in terms of hours of use?

- A5. *Per guidance from the ARB, the following table summarizes the expected hours of operation for in-use and new firewater pump engines operating under the NFPA provisions:*

Summary of Running Time for Fire Pump Engines							
Standard	Paragraph	Frequency	Duration per Test (mins)		Duration per Year (hours)		Notes
			Maximum	Minimum	Maximum	Minimum	
NFPA 25 1998	5-3.2.2	52 times a year	30	30	26.0	26.0	Weekly
	5-3.3.2.1	1/year	60	45	1.0	0.8	Annual (No flow)*
	5-3.3.1	1/year	60	30	1.0	0.5	Annual*
	9-5.2.1	4/year	30	15	2.0	1.0	Quarterly*
	9-5.2.2	1 every 5 years	240	30	4.0	0.0	Minimum reflects non-test year
Total					34.0	28.3	
* Time not specified in NFPA. Number based on experience of fire protection engineers							

- Q6. Health Care Facility Hours of Operation: What are the applicable requirements in terms of hours of use for health care facilities?

- A6. *Per guidance from the ARB, the following table summarizes the expected hours of operation for in-use and new engines at Health Care facilities:*

Summary of Running Time for Emergency Standby Engines at Health Care Facilities							
Standard	Paragraph	Annual Frequency	Duration per Test (mins)		Duration per Year (hours)		Notes
			Maximum	Minimum	Maximum	Minimum	
AB 390	HSC 41514.1(a)	52	20	15	17.3	13.0	
NFPA 110	8.4.9	1	240	0	4.0	0.0	Test req. 1 every 3 years. Minimum reflects non-test year.
NFPA 110 JCAHO	8.4.2 EC.2.10.4.1	12	45	30	9.0	6.0	NFPA and JCAHO test overlap. 0.75 hr test under 30% load; 0.5 hr test under no load
JCAHO	EC.2.10.4.1	1	135	0	2.3	0.0	Annual test only req. when no load test performed (see row above)
JCAHO	EC.7.40.2	12	20	15	4.0	3.0	Transfer switch tests
Total					36.6	22.0	

- Q7. Breakdowns: What happens if my E/S generator engine has a malfunction that lets the engine run continuously for an extended period of time? For example, say a solenoid fails on Friday evening and we do not find out about it until Monday morning. Am I in violation of my permit since this is not an emergency under the definitions of the ATCM?
- A7. *Equipment malfunctions may be able to qualify under the Breakdown provisions of APCD Rule 505 (Breakdown Conditions). This rule requires that qualifying equipment breakdowns be reported to the APCD ¹. The APCD has a 24-hour Breakdown Number (961-8802) that can be used for this purpose. Follow the instructions and leave the required information. The APCD will provide you with a Breakdown Number and you are required to file a final written breakdown report within 7 days. If the equipment cannot be fixed with 24 hours of discovery, then it must be shutdown and/or a Variance application must be filed with the APCD Hearing Board per the provisions of Rule 506 (Emergency Variances for Breakdowns).*
- Q8. Annual Report: I received my first permit in September of last year, and I will not have all of the data that Form ENF-92 required for the first nine months of last year. Should I send in an annual report (due by March 1 of this year) for operations during last year?
- A8. *You should start keeping records as soon as you receive your permit. There is no need to “go back” and attempt to establish the entire last year of engine use history if you do not have that data readily available (do provide the information if it was logged). Do submit an annual report for the last year providing the information that is available.*

¹ The owner or operator shall notify the District of any occurrence which constitutes a breakdown condition; such notification shall identify the time, specific location, equipment involved, and (to the extent known) the cause(s) of the occurrence, and shall be given as soon as reasonably possible, after its detection by such owner or operator, or his agents or employees, but in any case not later than four (4) hours after the start of the next regular business day.