

**INSTRUCTIONS FOR COMPLETING THE  
COMPLIANCE STRATEGY REPORTING FORM**

*Complete the Compliance Strategy Reporting Form for each diesel-fueled engine with a maximum rated brake horsepower (bhp) greater than 50 by **July 1, 2005**.*

The Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines requires the information on this form be submitted to the District. Failure to submit the required information, by the due date, may be a violation of ATCM requirements.

Fill out a separate form for each diesel engine greater than 50 bhp. An in-use engine is one that was installed prior to January 1, 2005 or received an Authority to Construct from the District prior to December 8, 2004.

The ATCM requires that all in-use stationary diesel-fueled engines identify a compliance strategy that when implemented will result in compliance with the emission limits of the regulation (ATCM). The District developed this reporting form to assist engine owners and operators with meeting the emission standards. In addition to this form, some engine owners or operators will have to submit an application to modify a current permit or registration.

*Engine and Facility Information:* Please provide the company name, contact name, phone number, and e-mail address. Also provide the District issued permit or registration number for that engine.

*Steps:* Answering the questions on the form will provide the District with information regarding how each engine will comply with the emission standards of the ATCM. Follow through each question as the form requests, only answering those questions pertaining to the specific engine listed on the form.

**Step 1** – Determine whether the engine is exempt from the emission standards in the ATCM. Engines that meet one of these exemptions must still comply with the other requirements of the ATCM. Page 2 of this form lists all the exemptions. The exemptions are slightly different for prime and emergency engines. An *emergency engine* is one that operates only for emergencies and for a limited time for maintenance and testing each year. A *prime engine* is any engine that is not an emergency engine. If your engine is exempt from the standards, be sure to mark the box next to the appropriate exemption and then sign and return the form to the District.

A complete list of exemptions is provided in Section (c) of the Airborne Toxic Control Measure for Stationary Compression Ignition Engines (17 CCR 93115). If you believe your engine qualifies for an exemption not listed on the form, contact the Mechanical Engineering Section at (619) 206-5230.

The following provides some clarification on a few of the exemptions:

- To meet the definition of a dual-fueled diesel pilot engine, the engine must use diesel fuel as a pilot ignition source at an annual average ratio of less than 5 percent.
- Diesel engines directly driving emergency fire pump assemblies are exempt from the diesel PM standards as long as the engines only operate for maintenance and testing the number of hours necessary to comply with National Fire Protection Association (NFPA) 25. An

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exceedance in the number of maintenance and testing hours required by NFPA 25 will result in requiring the engine to comply with the ATCM diesel PM exhaust standards and annual maintenance and testing limits.

- The exemption for low-use prime engines is only for engines operating less than 20 hours per year or turbine starter engines than operate more than 20 hours per year. If you claim this exemption you must submit an application with supporting information to the District to evaluate the claim. In case of a turbine starter engine that may operate more than 20 hours per year, a health risk assessment will be required.
- Remotely located in-use prime engines may request a delay in implementation of the ATCM standards until January 1, 2011. In order to qualify for this delay in implementation the engine must be located more than one mile from any receptor and have health impacts with a prioritization score of less than 1.0, a maximum cancer risk of less than 1 in a million, and a Health Hazard Index of less than 1.0. If you claim this exemption you must submit an application with supporting information to the District to evaluate the claim.

**Step 2** – Determine whether you have an emergency engine. See Step 1 instructions for the definition of emergency engine. If you do not have an emergency engine, and you have a prime diesel engine, you must submit an application to modify your current permit or registration to ensure compliance with the ATCM.

**Step 3** – Check the corresponding box if you know your engine's particulate matter exhaust rate. The engine's particulate matter exhaust rate can be based on the manufacturer's sales and service literature, the nameplate of the engine, engine certification data, or a source test.

**Step 4** – Owners or operators should only complete this step if they know their engines particulate matter exhaust rate. Mark the box corresponding to your engine's particulate matter exhaust rate. The exhaust rate on the form is expressed in grams per brake horsepower per hour (g/bhp-hr). If you have the particulate matter exhaust rate in grams per kilowatt per hour (g/kw-hr), multiple by 0.746 to convert from g/kw-hr to g/bhp-hr.

**Step 5** – For engine owners or operators who must complete Step 5, you must either choose to limit your engine's maintenance and testing hours to 20 per calendar year beginning in the year 2006 or submit an application. If you choose not to limit maintenance and testing hours to 20, then your engine will probably have to be modified to comply with the ATCM. This may include installing add-on control technology, which will require an application to modify your engine and obtain an authority to construct.

**Step 6** – For engine owners or operators who must complete Step 6, you must either choose to limit your engine's maintenance and testing hours to 30 per calendar year beginning in calendar year 2006 or submit an application requesting more than 30 hours per calendar year. If you choose not to limit maintenance and testing hours to 30, then your engine may have to be modified to comply with the ATCM and evaluated to ensure it does not cause a health risk by operating additional hours per year. This requires submittal of an application and evaluation by an engineer. The District will utilize previous health risk assessments for the engine during the evaluation to the extent possible.

**Step 7** – Sign the form and return it to Dan Speer, of the Engineering Section, by July 1, 2005. The District requests that all engine owners and operators return this form for each of their

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stationary diesel engines. This includes engines exempt from the exhaust standards and engines for which an application must be submitted. The District will use this form as a method to track each engine's compliance with the ATCM.

**Step 8** – This section describes why some engines must submit an application.

For information on how to submit this form via e-mail read “Guidelines for Permit Applications and Forms” at <http://www.sdapcd.org/permits/APPS/ReadMe.html>.