Proposed Amendments to Rule 2020 (Exemptions)

October 21, 2014
Topics

• Registered Portable Internal Combustion (IC) Engines
• Federal Requirements for IC Engines $\leq 50$ hp
• Heavy Oil Small Producer Tanks
• Alternate Source Test Methods
• Next Steps & Comment Deadline
• Comments/Questions
Applicability of State Law

• State Portable Equipment Registration Program (PERP) Regulations (13 CCR 2451(c)(9)) allow registered IC engines to operate at a stationary source under certain conditions:
  – Emergency IC engines
  – Electrical upgrades
  – Repair and maintenance

• Amendments eliminate any potential conflict with District permitting rules
Portable Registered IC Engines

- Section 6.16.2 will be added to Rule 2020 to clarify that these registered IC engines may operate at a stationary source under a portable equipment registration.
- Limited to 60 days of operation except as follows.
- Portable engines replacing permitted engines undergoing repair or maintenance must also qualify as a Temporary Replacement Emissions Unit (TREU) per Rule 2201, section 3.41.
  - Limited to 180 days on site.
Federal Requirements for Engines under 50 hp

- Equipment subject to federal regulations for Major Sources generally requires permits regardless of other exemptions

- New federal regulations apply to engines $\leq 50$ hp:
  - New Source Performance Standards (NSPS), Subparts IIII and JJJJ
  - National Emissions Standards for Hazardous Air Pollutants (NESHAP), Subpart ZZZZ
Federal Requirements for Engines under 50 hp (Cont’d)

• These new federal regulations:
  – Apply to non-Major Sources (unusual)
  – Designed to be implemented and enforced without permits
• Engines under 50 hp exempt from permits under Rule 2020
• Clarify 50 hp exemption applies to engines subject to federal requirements for non-Major Sources (Rule 2020 Sections 3.6 & 3.12)
Small Producer Heavy Oil Tanks

- Small Producer oil storage tanks with throughput of 50 barrels per day or less are exempt from control requirements of Rule 4623.
- Such tanks used for heavy oil storage have insignificant emissions (< 0.2 lb-VOC/day).
- Requiring permits has no air quality benefit (no Best Available Control Tech. or offsets required).
- Section 6.6.12 added to Rule 2020 to exempt heavy oil storage tanks at Small Producers.
Source Test Methods

• Eliminate specification of the version of the test method to be used (e.g. D-1298-80)
• Consolidate several similar sections into one, allowing alternate source test methods with EPA and District approval (Rule 2020 Section 8.2)
Next Steps...

10/21 – 11/4:
Public comment period

11/18 – 12/2:
Public comment period

11/18:
Publication of proposed rule package to District web page

12/18/14:
Governing Board Public Hearing
Comment Deadline

November 4 at 5:00 PM

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Questions/Comments

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Webcast participants can email written questions/comments while the webcast is operational: webcast@valleyair.org