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W. James Wagoner
Air Pollution Control Officer

Robert McLaughlin
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October 20, 2010

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Proposed Amendments to the Airborne Toxic Control Measure (ATCM) for
Stationary Compression Ignition Engines

The Butte County Air Quality Management District (District) appreciates the opportunity to comment on the proposed amendments to the ATCM related to new emergency engines. The District appreciates the California Air Resources Board's efforts to harmonize the regulation with the federal Standards of Performance for New Stationary Sources for Stationary Compression Ignition Internal Combustion Engines (NSPS III) and protect public health through the implementation of the diesel particulate matter reduction regulations.

The proposed amendments do harmonize the State and federal requirements for emergency fire pumps; however, for other emergency engines less than 175 horsepower, the proposed diesel particulate matter standards continue to be lower than the current Tier 3 standards. While the District understands from CARB staff that there are engines available to meet the proposed standards, the disjoint between the two regulations will continue to cause confusion to the regulated community. An entity or person may unknowingly purchase an emergency engine meeting the current Tier 3 standard that does not meet the proposed amendments requirements and will be required to either purchase a different engine or additional controls, such as a diesel particulate filter (DPF), to comply with the regulation.

In short, the intent of the proposed amendments are set the emission standard to the Tier 3 level and to not require additional controls or reductions for emergency engines to comply the ATCM; however, as proposed, the regulation may require diesel PM additional controls for engines less than 175 HP. The District would recommend the diesel PM standards in Table 1 be revised to exactly match the Tier certification standards for the engine power rating ranges.

Thank you again for the opportunity to provide input into the proposed amendments to the ATCM. If you have any questions regarding these comments, please contact me at (530) 891-2882, ext. 113.

Sincerely,

A handwritten signature in cursive script that reads "David J. Lusk".

David J. Lusk
Senior Air Quality Engineer
Butte County Air Quality Management District