



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

October 24, 2007

Dear Air Pollution Control or Executive Officer:

Subject: Upcoming Compliance Date for Stationary Diesel Engines Enrolled in Demand Response Programs

The purpose of this letter is to draw your attention to a January 1, 2008, compliance requirement for stationary emergency standby diesel-fueled compression ignition engines enrolled in a Demand Response Program (DRP). As a reminder, the Airborne Toxic Control Measure for Stationary Compression Ignition Engines (ATCM) allows diesel-fueled emergency standby engines to enroll in two specific types of DRPs: an interruptible service contract (ISC) or the San Diego Gas and Electric Company's Rolling Blackout Reduction Program (RBRP) provided they comply with progressively more stringent PM emission standards and limit the annual hours of operation when operating under an ISC or an RBRP. Below, I have highlighted the requirements in the ATCM for engines in an ISC or an RBRP.

Emergency Standby Engines Enrolled in an ISC

Section 93115.6 (c)(1)(C)(1)(c) requires new DRP engines enrolled in an ISC on or after January 1, 2005, to meet the more stringent diesel PM standard of either 0.01 gram per brake horsepower-hour (g/bhp-hr) or the current model year diesel PM standard in effect on the date of ISC enrollment. Section 93115.6 (c)(2)(C)(1)(f) requires all in-use DRP engines enrolled in an ISC on or after January 1, 2008, to meet a diesel PM standard of 0.01 g/bhp-hr. What this means is any diesel-fueled engine (new or in-use) participating in an ISC on or after January 1, 2008, shall meet the more stringent diesel PM standard of 0.01 g/bhp-hr.

Emergency Standby Engines Enrolled in San Diego Gas and Electric RBRP

Section 93115.6 (c)(1)(C)(1)(b) of the ATCM requires new DRP engines enrolled in an RBRP on or after January 1, 2008, to meet the more stringent diesel PM standard of either 0.01 g/bhp-hr or the current model year diesel PM standard in effect on the date of enrollment in the RBRP. Section 93115.6 (c)(2)(C)(1)(c) requires in-use DRP engines enrolled in an RBRP after January 1, 2008, to meet a diesel PM standard of 0.01 g/bhp-hr. In essence when the date the party entered the RBRP is on or after January 1, 2008, the new or in-use RBRP engine is required to meet the more stringent diesel PM standard of 0.01 g/bhp-hr. Any in-use DRP engine enrolled in the RBRP on or after January 1, 2005, and prior to January 1, 2008, is required to meet a diesel

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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PM standard of 0.15 g/bhp-hr, and the requirements specified in section 93115.6 (b)(3)(A) for maintenance and testing hours of operation.

Critical to understanding of these provisions is the meaning of the term "enrolled" as defined in section 93115.4 (gg) of the ATCM. The definition for enrolled is as follows:

"Enrolled" means either of the following, whichever applies:

- (1) the ISC is in effect during the specified time period for an engine in an ISC; or*
- (2) the date the engine is entered into the RBRP.*

This definition of "enrolled" was designed to have different meanings depending on which DRP program the emergency standby engine is enrolled. As such, for RBRP engines the initial enrollment date effectively determines the applicable PM emission standard; while for an emergency standby engine in an ISC "enrolled" means the engine is participating in the ISC.

For your information, to assist in identifying the owners or operators of the diesel-fueled emergency standby engines subject to the more stringent diesel PM standard for engines enrolled in an ISC, Air Resources Board staff have submitted a request to Southern California Edison and Pacific Gas and Electric to supply information on the owners and operators of emergency standby engines enrolled in DRPs. Once the information is received, my staff will contact the air district staff where these engines are permitted and provide them with the appropriate information.

A copy of the amended ATCM, effective October 18, 2007, may be found at <http://www.arb.ca.gov/diesel/statport.htm>. If you have any questions regarding the provisions of the ATCM as they pertain to engines enrolled in DRPs or any other provisions of the ATCM, please contact Ron Hand of my staff at (916) 327-6683.

Sincerely,

/s/

Daniel E. Donohoue, Chief
Emissions Assessment Branch
Stationary Source Division