

Fall CAPCA Meeting 2007

Small Diesel Engine/Generator Permitting in South Carolina

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Small Diesel Engines/Generators

Permitting Requirements

- **NSPS and MACT Requirements**
- **State Regulatory Exemption**
- **Part 70 and Minor Source Permitting**
- **Area Source Permitting**
- **BAQ's Path Forward**

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NSPS Requirements

- **NSPS IIII – Stationary Compression Ignition Internal Combustion Engine (CI ICE)**
- **Rule was final in July 2006**
- **Applies to Engines constructed, modified or re-constructed after July 11, 2005**
- **Manufacturer Certification required for new engines**
- **Non-certified engines require notification and possible testing**
- **Part 70 Permit not required**

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NSPS Requirements

- **NSPS JJJJ – Stationary Spark Ignition Internal Combustion Engine (SI ICE)**
- **Rule was final in June 2007**
- **Applies to Engines constructed, modified or re-constructed after July 12, 2006**
- **Certified Engines – Maintain documentation**
- **Non-Certified Engines – emission limits based on size and fuel type**
- **Initial performance test required for non-certified units**
- **Maintain records of proper operation**

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MACT Requirements

- **Subpart ZZZZ – NESHAP for Reciprocating Internal Combustion Engines – Area Sources**
- **Proposed promulgation is December 20, 2007**
- **Existing engines have NO emission limits; New and re-constructed engines must comply**
- **Certified engines assumed to meet emission limits – No performance testing required**
- **New and re-constructed engines require an initial performance test**
- **Emergency engines require installation of a non-resettable hour meter with record keeping**
- **The hour limit is 100 hours per year (can petition for more)**

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State Regulatory Exemption

- **SC Regulation 61-62.1, Section II, B.2 exempts certain sources from state construction permitting requirements**
- **Emergency generators less than or equal to 150 KW**
- **Emergency generators greater than 150 KW operating less than 500 hours**
- **These source would not require the issuance of an operating permit**
- **These sources are considered “exempt” for facilities holding operating permits**
- **Emissions from these sources are included for facility-wide PTE calculations**

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Part 70 and Minor Source Permitting

- Part 70 and Minor Source permits currently list those generators “exempt” per state regulations as “insignificant activities”
- Engines/generators subject to a NSPS or MACT standard will not be considered “insignificant activities” or “exempted” from state permits
- Sources with no specific requirements will have a general condition of applicability placed in the permit
- Permitting will work with the Department’s “Air Toxics” group to condition the sources
- Changes to the permits will be made at the next renewal or re-opening

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Area Source Permitting

- Area sources subject to a NSPS or MACT and not required to obtain a Part 70 or Minor Source operating permit will fall under the Department's "Area Source Permitting Program"
- Traditional construction/operating permits do not fit this source category
- Large quantity of sources with relatively small emissions
- Sources not otherwise requiring a permit will not be issued a permit for the NSPS or MACT rule
- Initial notifications will be reviewed by the Department's Air Toxics Group

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BAQ's Path Forward

- A fact sheet for the NSPS Standards and upcoming MACT are being developed for permitted facilities
- BAQ is working with various trade groups to identify “Area Sources” subject to new federal requirements for targeted outreach
- Outreach efforts including training classes, brochures, calendars, etc. will be developed for Area Sources
- Specific outreach for engine/generator manufactures subject to the federal rules is also being explored
- The Department is working with EPA to determine an “enforceable mechanism” for these sources