

Agenda Date: March 18, 2010  
Agenda Placement: Admin.  
Estimated Time: N/A  
Continued Item: No

## Board Agenda Item

TO: Air Pollution Control District Board

FROM: Terry Dressler, Air Pollution Control Officer

SUBJECT: City of Santa Maria Stand-by Generator Issue

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### RECOMMENDATION:

Receive and file report on City of Santa Maria stand-by generator issue.

### DISCUSSION:

This report responds to a question by Mayor Lavagnino regarding the maintenance and testing time limitations on a diesel fueled emergency stand-by generator owned and operated by the City of Santa Maria that he raised during the public comment period at the January 21, 2010 APCD Board meeting. Initially, no one on APCD staff was aware of any problems with the City of Santa Maria stand-by generators and I asked them to investigate Mayor Lavagnino's concerns. Below, I outline what we discovered by contacting Santa Maria City staff, reviewing the City's APCD permits, and attending a meeting with the City's Director of Public Works and members of his management and supervisory staff.

APCD staff interviewed the Streets & Facilities Supervisor for the City of Santa Maria Public Works Department who explained that during a recent severe weather event, the emergency backup generator supporting the Police Department (this includes the 911 system, Dispatch, and critical systems within the Police Department) over-heated due to a radiator problem. It occurred during emergency operation of the engine. There are no limits placed on emergency use of stand-by generators. City staff related that when the local (city) 911 system goes down it is automatically routed to the county system and as such no actual failure or interruption of the local 911 system occurred. However, other electricity dependent systems within the Police Department were down. The engine has not exceed the permitted maintenance and testing hours nor is it in danger of doing so. There are no enforcement issues pending with regard to this engine. City staff would prefer that longer and more frequent testing be allowed in order to ensure the reliability of the engine.

Limitations are placed on maximum testing and maintenance hours for diesel fueled stand-by emergency generator engines by the state Air Toxic Control Measure for Stationary Diesel Fueled Internal Combustion Engines. The limits are not established by either local APCD policy or local rule. The testing and maintenance hours limits vary according to the age and air pollution emission profile of the engine. Older engines are limited to 20 hours per year (about 1 hour and 40 minutes per month or a little over 20 minutes per week) while the newer, cleaner engines are allowed 50 hours. New engines that are equipped with diesel particulate filters are allowed 100 hours per year of maintenance and testing operations. Most of the diesel stand-by generator engines throughout the county that operate under APCD permit are limited to the 20 hours. As I stated above, there are no limits to emergency related operations. The APCD is compelled by state law to limit the maintenance and testing hours as stipulated by the state Air Toxics Control Measure.

I met with the Santa Maria City Director of Public works and members of his management and supervisory staff to discuss the issue and explore options. Among the options that we discussed would be to conduct periodic longer tests less frequently, which would provide the opportunity to test the engine for an extended period while remaining within the allocated 20 hours per year. The limitation is annual, there is no limit regarding the duration of any single testing period (as long as it does not result in the exceedance of the 20 hour per calendar year limit). We also discussed the option of testing the engine's emissions to determine if the actual emissions profile of the engine would qualify for additional maintenance and testing hours. During the meeting, I agreed to contact California Air Resources Board (CARB) staff to determine if they have granted special permission or know about any special permission granted to increase maintenance and testing hours for Tier 0 emergency standby generators operated for public safety (e.g., fire and police). CARB staff told me that that they know of no such special permission having been granted in California; and expressed a concern that allowing increased testing hours for engines of the Tier 0 model year emissions profile would potentially expose nearby residents and workers to unacceptable levels of toxic air contaminants.