



COMPLIANCE ADVISORY

Use of engines to provide power to buildings

September 17, 2020

Background:

Since at least 1995, the Yolo-Solano Air Quality Management District Rule 3.1 has required permits to install and/or operate internal combustion engines. Engines emit air contaminants which contribute to our regional ozone problem, as well as toxic air contaminants which pose a risk to nearby residents and businesses. Our permit requirements apply to stationary engines as well as portable engines.

In 1997, the state adopted the Portable Equipment Registration Program ([PERP](#)) which offered a voluntary alternative to local air permits for portable engines. Because these registrations were for engines that moved from location to location (weren't used at fixed locations for any length of time), the requirements for the PERP program are not as health protective (i.e. less stringent) as the requirements for district permits. As a result, the PERP regulation has certain restrictions, including that portable engines can't be used to provide power to buildings, except under very limited situations.

Specifically, at the point that you connect and/or wire an engine with a generator to a building, that is considered installation of an emissions unit at a stationary source which requires a District permit, even if the engine was manufactured or designed as a portable engine (indicia of portability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform). Below, we will outline the very limited situations where it is allowed to legally power a building with a portable engine, with a PERP instead of a district permit.

Current situation:

In light of the recent Public Safety Power Shutoff (PSPS) events, there has been a lot of interest from businesses to bring in portable engines to power their facilities during loss of utility power.

What is allowed under PERP:

- After you lose utility power, you can connect a portable engine to power your building(s) so long as the engine is an EPA certified engine that is currently registered in PERP, or for which you have submitted a form 40 (during an emergency event). You can use the portable engine only for the duration of the outage and disconnect the portable engine from the building(s) once utility power has been restored.
- For calendar year 2020, if you are concerned about a PSPS event and want to connect a portable engine to your building(s) in advance of actually losing utility power (e.g. with

an automatic or manual transfer switch), you can do that so long as you provide advance written notification to the district per the attached District form ([available here](#)). Please note - the engine must be an EPA certified engine that is currently registered in PERP, or for which you have submitted a form 40 (during an emergency event).

What is not allowed under PERP:

- You cannot connect a portable engine to your building(s) and run it before actually losing utility power. For example, if you anticipate a PSPS (or get notification that a PSPS is coming), you can't start the engine until after you actually lose power, and operation must cease when power is restored.
- If you connect a PERP engine to your building in 2020, you can't connect a PERP engine to your building in 2021, even if it's a different engine.

What is allowed under district permit:

- You can connect portable or stationary engines to your building(s) in an automatic or manual start mode.
- If you want to connect an engine(s) to your building(s) for multiple years, it is recommended that you contact the District to discuss permitting options and requirements. You can obtain a district permit that is "flexible", so that it could cover various engines (up to a certain size) so that you could use rental engines.

Questions

If you have specific questions about your situation, please contact district staff at (530) 757-3650.