



*NASSCO Environmental Instruction #9:*

# Environmental Requirements for Operating Non-Road Diesel Engines

## *Overview of Environmental Requirements for*

A diesel engine is considered "non-road" when it is used to power equipment that is not self-propelled; the equipment is considered portable when it is designed to be easily relocated (e.g., equipped with wheels, handles/pad eyes, or skid-mounted). Portable diesel generators, compressors, hydro blasters, and fire pumps are examples of non-road diesel engines which are subject to strict local and state environmental laws. Subcontractors proposing to bring portable non-road diesel engines into NASSCO must be aware of and comply with the environmental requirements applicable to the operation of this equipment.

For questions about these or any other NASSCO environmental requirements, call 619-544-7506.

## Before You Begin

### **NASSCO Approval**

Your company may not operate non-road diesels at any NASSCO facility without first applying for and obtaining approval from the Environmental Engineering Department to conduct this activity. To apply for approval, a completed and signed copy of "[NASSCO Environmental Form #9: Request for Authorization to Operate Non-Road Diesel Engines at NASSCO Facility](#)" to the NASSCO Environmental Engineering Department at [Envreports@nassco.com](mailto:Envreports@nassco.com) or fax to 619-744-1088. You may not begin operating non-road diesel engines until approval has been received from the Environmental Engineering Department.

### **Requirement for Permit or Registration**

Portable non-road diesel engines greater than 49 horsepower are required to be permitted or registered by an air pollution control agency. The San Diego Air Pollution Control District (SDAPCD) is the oversight agency for portable non-road diesel engines operated solely within San Diego County. Alternatively, owners of portable non-road diesel engines may elect to register their equipment with the California Air Resource Control Board (CARB), which authorizes statewide operation of the equipment. If your company owns portable non-road diesel equipment (>49 hp), it is responsible for obtaining and maintaining the appropriate permit or registration, as required. For more information about San Diego County's permitting/registration program, contact SDAPCD at 858-586-2600, or visit [www.sdapcd.org](http://www.sdapcd.org). For information on the State of California's portable equipment registration program, contact the Statewide Registration Program Information Line at (916) 324-5869 or visit [www.arb.ca.gov](http://www.arb.ca.gov).

If your company rents portable non-road diesel equipment for use at NASSCO, be sure that copies of the SDAPCD or CARB registration documents are obtained from the rental company.

Whether the equipment is owned or rented, a copy of the current/unexpired permit or registration document must be provided to NASSCO's Environmental Engineering Office at [envreports@nassco.com](mailto:envreports@nassco.com) (or fax to 619-744-1088) before bringing the unit on-site. If the work will occur at another shipyard or a Navy facility, then a copy of the permit must be provided to the Environmental Department for that specific facility.

### **California Diesel**

The State of California specifies that diesel fuel used in California must be formulated to certain standards, as specified in Title 13 of the California Code of Regulations (Sections 2281 and 2282). This low-sulfur fuel, known as

"California Diesel" is the only allowable fuel source for diesels operating at NASSCO. All persons operating diesel engines at NASSCO should be prepared to provide proof that California Diesel is being used when requested.

## **Notification to Local Air District**

Equipment which operates under a CARB Registration will typically indicate a "home district." If the "home district" is anything other than San Diego County, then the operator is responsible for notifying the local air district (SDAPCD) that the engine will be operating within the district boundaries. NASSCO Subcontractors/Team Members are responsible for making the required notification for any registered diesel equipment (owned or rented) to be operated at NASSCO, before bringing the equipment on-site. A copy of the notification must be sent to NASSCO Environmental Engineering.

Additional prohibitions and notification requirements have been established for CARB registered diesel engines operating on State Territorial Waters. NASSCO Subcontractors/Team Members planning to operate CARB Registered portable diesel engines aboard a vessel while it is entering or exiting NASSCO's Floating Dry-dock or Graving Dock should contact the APCD for additional information. In most cases, 14-day advance notice to APCD is required. If such notification is required, a copy of this notification must also be sent to NASSCO Environmental Engineering.

## **Diesel Airborne Toxic Control Measures**

Operators of portable diesel equipment (>49 hp) in the State of California must comply the Diesel Airborne Toxic Control Measures (ATCM) established by the California Air Resources Board (CARB); see Section 93116 of Title 17 of the California Code of Regulations. These measures established a January 1, 2010 deadline by which all in-use portable diesel engines must be certified to a Federal Tier 1, 2 or 3 nonroad engine standards. Since inception of the ATCM, CARB established some short-term extensions for certain uncertified engines to remain in service until January 1, 2011. To ensure compliance with the ATCM, **NASSCO will not allow the use of uncertified (Tier 0) engines in its facility after January 1, 2011.**

## **Work Practices**

NASSCO Subcontractors and Team Member are responsible for educating their employees and third party subcontractors on the applicable environmental requirements associated with operation of diesel engines, including the following:

### **Posting of Permit and Operator Information**

While your portable non-road diesel engine is at NASSCO, the current SDAPCD or CARB Registration must be posted or located on the equipment. If your equipment has a maximum horsepower rating of less than 50, it does not require a permit or registration, however, the horsepower must be clearly and conspicuously posted on the equipment. All equipment must be clearly labeled with the name of the company operating the equipment as well as the name and phone number of a responsible contact person.

### **Recordkeeping**

The permit or registration document will outline the specific recordkeeping requirements for each diesel engine. Generally, this will require that the date and total run time be recorded each time the engine is operated. The required operational records must be maintained on or near the unit at all times.

## **Pollution Prevention**

State and local regulations require that diesel engines and their pollution control devices be operated and maintained in accordance with manufacturer's specifications. The equipment must be kept in good condition to prevent release of excess emissions or leaks and spills. All engines must be operated in conformance with SDAPCD Rule 50, which prohibits visible emissions. Furthermore, when non-road diesel equipment is operated near sensitive spill pathways (such as onboard a vessel or within the floating drydock) or on any Navy pier or berth, then secondary containment must be provided. If, at any time during the operation of the diesel equipment, there is evidence of an environmental release (e.g., fuel spill or leak, crankcase smoke, visible emissions from the exhaust outlet), then the equipment must be immediately shut down until the problem can be resolved.

## **Spills or Environmental Releases**

Spills and releases of chemicals, including diesel fuel and oil, must be immediately reported to NASSCO Security 619-544-8401 according to NASSCO's spill reporting policy, as outlined in NASSCO's Best Management Practice #102.

## **After the Work is Completed**

### **Compliance Certification and Monthly Usage Reporting**

At the end of each month, all companies operating non-road portable diesels (>50 hp) at NASSCO are required to certify as to their compliance status using a "Title V Monthly Air Compliance Certification Form." Additionally, a report showing the number of hours each engine ran and an estimate of fuel usage must be submitted to NASSCO using the reporting form provided (or approved equivalent). The signed forms must be sent to Environmental Engineering at [envreports@nassco.com](mailto:envreports@nassco.com) or faxed to 619-744-1088.

NASSCO Subcontractors operating non-road diesel engines at any other shipyard or any Navy facility must submit usage records to that facility's Environmental Department monthly.