

NASSCO Environmental Instruction #9:

Environmental Requirements for Operating Non-Road Diesel Engines

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. If your company is proposing to bring portable non-road diesel engines into NASSCO, then you must be aware of and comply with the environmental requirements applicable to the operation of this equipment.

For questions about this or any other NASSCO environmental requirement, please 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 apply for approval, submit 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. 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. 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.

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. A copy of the registration must be submitted with your *Request for Authorization*.

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 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.

Tier 4 Emission Standard Requirement

To reduce emissions from nitrogen oxides (NO_x) and diesel particulate matter (PM), **all portable non-road diesel engines operated at General Dynamics NASSCO after September 30, 2019 must comply with EPA Tier 4 emission performance standards.** Tier 4 engines generally have emissions that are at least 90% lower than older, Tier 1, 2, or 3 engines. No engine other than engines meeting the Tier 4 standards shall be operated within the NASSCO shipyard unless explicit permission is granted by NASSCO Environmental Engineering.

Work Practices

Your company is responsible for educating your 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, if the engine has a capacity to hold >55 gallons of oil or fuel, or when non-road diesel equipment is operated near sensitive spill pathways (such as onboard a vessel or within the floating dry dock) 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 at (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 (>49 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. 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 by the 10th of the month following each month of use.