Public Workshop

Draft Amendments to Rule 2280 (Portable Equipment Registration)

October 24, 2018 webcast@valleyair.org



Disclaimer

- Proposed amendments discussed today only apply to portable engines and equipment registered with the District under Rule 2280
- Nothing discussed today applies to portable engines or equipment registered with the state under the California Air Resources Board Portable Equipment Registration Program
- Nothing discussed today changes any applicable requirements for portable diesel engines under the state Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines (ATCM)



Current Rule 2280

- Last Amended 5/16/1996
- Voluntary streamlined registration process for portable units in lieu of traditional stationary source permitting
- Applies to portable emission units used in conjunction with designated source categories
- Incorporates operating requirements for various source categories
- Prevents severe short-term air quality impacts and public nuisance by restricting their proximity to schools and setting daily and annual emission limits



Purpose of Proposed Amendments

- Replace outdated emission requirements for diesel engines which have been superseded by the portable Airborne Toxic Control Measure adopted by the California Air Resources Board
- Allow the District to issue registrations for:
 - Air curtain burn boxes, a cleaner alternative to open burning
 - Internal combustion engines used to power air curtain burn boxes
- Incorporate operating requirements for air curtain burn boxes



Portable Diesel-Fired Engines

- No new requirements clarify engines are required to meet existing diesel PM and diesel fuel requirements set forth in CARB's ATCM
- Removed antiquated source category requirements for engine timing retardation and NOx emission limits
- Removed specific requirements to equip engines with a turbocharger and aftercooler



Portable Air Curtain Burn Boxes

- Source category requirements incorporate federal New Source Performance Standard requirements for air curtain burn boxes and applicable local prohibitory rules
- Approved materials for portable air curtain burn boxes:
 - -Only District authorized agricultural materials, forest management materials, or hazard reduction materials may be burned
- Opacity limits and testing requirements (EPA Method 9)
- Criteria pollutant emission limitations
- Best operating practices
- Combustion engine powering unit has to meet most stringent emissions standard in effect at time of registration application



Best Operating Practices

- Use propane torch, drip torch, or flare to ignite the material inside the burn box. No accelerants (e.g. gasoline, diesel fuel, kerosene, turpentine, etc.) may be used.
- Materials shall be loaded into the burn box such that they do not protrude above the air curtain.
- The air curtain burn box shall be attended at all times while materials are being burned or flames are visible inside the burn box.
- Airflow shall be maintained until all material within the burn box has been reduced to coals, and flames are no longer visible.
- Ash removed from the firebox shall be handled, stored, and disposed of in a manner minimizing entrainment into the atmosphere.
- Operated according to manufacturer's specifications and in a manner to minimize emissions of air contaminants into the atmosphere.



Next Steps...

10/24:

Public Workshop 11/7:

End of workshop comment period 11/20:

Publication of proposed rule package to District web page

12/20/18:

Governing Board Public Hearing



Email Notification Lists

http://www.valleyair.org/lists/list.htm



Comment Period

Please submit comments by November 7, 2018 at 5PM

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Comments?

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