



Regulatory Advisory

A service to members, advisories are produced whenever there is a significant development that affects the job you do in your community.

EPA Issues Standards of Performance for Stationary Compression Ignition Engines

A Message to ASHE Members:

On June 28, 2006 the Environmental Protection Agency (EPA) published its final rule that sets performance standards for stationary compression ignition internal combustion engines. Although this proposed rule affects many industries, it specifically affects healthcare providers with emergency generators, engine powered fire pumps, and generators used for peak shaving or load curtailment.

On July 29, 2005 ASHE issued a regulatory advisory to ASHE members urging members to provide comments to the EPA on the proposed rule (issued by EPA on July 11, 2005). The issue of most concern was a proposed 30-hour limit on non-emergency operation. In surveys conducted by ASHE and the MGI Systems-Healthcare Engineering Network, the majority of respondents indicated that 30 hours were insufficient for annual inspection, testing, and maintenance of their emergency generators. EPA received many comments from ASHE members and considered them in formation of the final rule.

Generator Maintenance and Testing addressed in the Final Rule

The *Summary of Responses to Major Comments* section of the final rule states “EPA has determined that it is appropriate to allow emergency engines to operate 100 hours per year during maintenance and testing. It is crucial to allow owners and operators of emergency engines to sufficiently test and maintain their emergency engines to ensure the engines will respond properly and as expected during an emergency situation”. “In addition, EPA believes that there may be cases where it is necessary for an owner or operator of emergency engines to operate their emergency engines beyond 100 hours per year to ensure their engines will respond as needed during an emergency. Therefore, EPA has incorporated a provision into the final rule that allows owners and operators to petition the Administrator for approval to operate their emergency engines for more than 100 hours per year for maintenance and testing purposes.”

Defining Emergency Generator

The final rule provides the following definition: “Emergency stationary internal combustion engine means any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or

stationary ICE used to pump water in the case of fire or flood, etc. Stationary CI ICE used to supply power to an electric grid or that supply power as part of a financial arrangement with another entity are not considered to be emergency engines.” The final rule also states “Finally, **peak shaving is not considered emergency use ...**”

The Importance of the Designation “Emergency Engine”

The final rule is intended to set minimum air quality performance standards for new engines only (beginning with model year 2007 engines). It is not meant to be applied to existing engines already in service. These new performance standards must be achieved through the engine design rather than through the use of additional emission control devices. After model year 2007, engines must perform to a designated level (Tier 1, 2, 3, or 4) based on a number of factors, including intended use, engine size, and displacement per cylinder. **Emergency generators are allowed to meet a lower performance level than other stationary engines based on their infrequent use.**

Requirements for Emergency Engines

The final rule states:

- All emergency stationary CI ICE must have a non-resettable hour meter to track the number of hours operated during any type of operation.
- Owners and operators of emergency engines are required to keep records of their hours of operation. Owners and operators must record the time of operation of the engine and the reason the engine was in operation during that time.

Thoroughly Review the Final Rule before Designing or Installing New Generators

This Advisory is a high-level look at this new EPA rule. The rule is quite complex and should be thoroughly reviewed to understand its full impact on your facilities operations. ASHE members are encouraged to discuss the specific circumstances that potentially impact them with their generator supplier, design engineering firm, and/or emergency power consultant to ensure full compliance with this rule and avoid any potentially costly surprises.

The final rule may be downloaded from EPA at

www.epa.gov/ttn/oarpg/t3/fr_notices/ci_nsps_fnl.pdf

EPA provides additional information in its Fact Sheet at

www.epa.gov/ttn/oarpg/t3/fact_sheets/ci_nsps_fnl_fs.html#background

For ASHE’s July 2005 Regulatory Advisory on the Proposed Rule and ASHE’s comments to the EPA go to www.ashe.org/ashe/codes/epa/index.html

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