

**SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
POLICIES AND PROCEDURES**

Policy No. <u>6100.005.1988</u>	Draft _____
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Supersedes No. _____	Final <u>x</u>
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Date: <u>April 11, 1988</u>	Pages <u>2</u>
Topic: <u>Testing of Emergency Equipment</u>	
Distribution: <u>APCD Staff</u>	

This memorandum is intended to provide guidance to allow for the testing of emergency equipment during the construction period and prior to commencement of the Source Compliance Demonstration Period. The testing of emergency equipment will normally not result in substantial quantities of emissions due to the size of the equipment and short duration of testing.

The term "emergency equipment" includes firewater pumps and emergency generators that are not powered by grid electricity. It does not include spare equipment such as pumps, compressors, heaters, etc.

The applicant must provide the following:

1. description of the equipment to be tested, including manufacturer, model number(s), serial number(s) and power or heat input rating (as applicable).
2. Test schedule, include date(s) of testing and length of testing period. The applicant should be instructed that should there be any changes in the schedule the District must be informed at least twenty-four (24) hours in advance or on Friday if the testing is on Monday.
3. Description of the test plan, including time period, load factors, estimated fuel usage.
4. Recordkeeping - the District must be provided with a written report which includes the following: length of test period, engine loads tested, amount of fuel used, any problems encountered and solutions, and an estimate of emissions using District approved emission factors (i.e., from the ATC). This information should be included as part of any monthly or quarterly reporting requirements associated with the construction phase. if there are no ATC construction reporting requirements, specify a time period - e.g., ten days after the test.

Policies and Procedures Memoranda are intended to provide agency staff, applicants and the public guidance relative to standardized District procedures. These policies and procedures shall not be interpreted in conflict with District Rules and Regulations or administrative policies, and may be modified or updated periodically without advance notice.

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The project manager should check/verify the following:

5. Ascertain that the emissions from the test would not cause exceedances of any ambient standards. Some projects may have a construction curtailment condition. If emissions testing may cause an ambient standard exceedance, some construction equipment would have to be shut off.
6. The emergency equipment is as permitted by the ATC - e.g. the number of pieces of equipment, horsepower ratings, control devices, etc.
7. There are adequate construction phase offsets to cover any additional emissions from the testing which are not accounted for in the ATC.
8. Contact the County Fire Department (for firewater pumps) and the office of Disaster Preparedness (for emergency generators). These agencies may have their own requirements insofar as emergency equipment testing and there is a need for coordination.

After receiving and approving the information required in Items #1, 2 and 3 (above) and verifying Items #5, 6, 7 and 8 the project manager should prepare a letter authorizing the testing and specifying the recordkeeping provisions of Item #4. The letter should also state that the test procedure shall not deviate from the test plan (Item #3) and that the District may elect to have an observer present. As appropriate, other conditions on the testing may be required to account for individual project requirements.