

NASSCO Environmental Instruction #9:

Environmental Requirements for Operating Non-Road Diesel Engines

Non-road diesel equipment like compressors, generators, hydro blasters, and fire pumps are strictly regulated by the California Air Resources Board (CARB) and the San Diego Air Pollution Control District (APCD). Therefore, NASSCO closely manages parties that operate non-road diesel engines onsite and at NASSCO facilities. All operators must know and comply with the environmental requirements related to operating non-road diesels.

For questions about the requirements listed below or environmental regulations, please call 619-544-7506.

Before You Begin

Authorization to Work at NASSCO

Your company must first obtain authorization from the Environmental Engineering Department to operate non-road diesel equipment. To request authorization, send a signed and completed 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. If approved, your company will be authorized for the duration listed on the form up to a maximum of one year. Each new scope of work must have a separate authorization from NASSCO.

Permits and Registrations

Portable non-road diesel engines greater than 49 horsepower (hp) operating solely within San Diego County require a Certificate of Registration the APCD. Alternatively, owners of portable non-road diesel engines may register their equipment with the California Air Resource Control Board (CARB) portable equipment registration program (PERP), which authorizes statewide operation of the equipment. Your company is responsible for obtaining and maintaining the appropriate permit or registration for non-road diesels greater than 49 hp. For more information about San Diego County's permitting program, please contact the APCD at 858-586-2600, or visit www.sdapcd.org. For information on the State of California's PERP, 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 your scope of work at NASSCO, remember to obtain the equipments' APCD Permits or CARB registrations from the rental company. Submit copies of the documents with your *Request for Authorization*.

Whether the equipment is owned or rented, provide current (unexpired) permit(s) or registration(s) to NASSCO's Environmental Engineering at envreports@nassco.com before bringing the unit(s) onsite.

Electric Compressor / EPA Tier 4 Equipment Requirement

NASSCO requires contractors to operate only electric compressors and EPA Tier 4 certified (or better) non-road diesel engines at the shipyard.

Work Practices

Your company is responsible for educating your employees and subcontractors on the applicable environmental requirements associated with operating non-road diesel equipment, including the following:

Posting of Permit and Operator Information

Each piece of non-road equipment must have its current (unexpired) APCD Permit or CARB Registration posted or located on the equipment and the name of the equipment's company and point of contact information. Equipment rated less than 50 hp do not require a Permit or Registration but must have clear and conspicuous power rating labels. Finally, the engine serial number and model must match the information listed in the equipment Permit/Registration.

Recordkeeping

While a Permit/Registration will outline specific recordkeeping requirements, non-road equipment typically require the date and total run time for each operation of the engine. Operators must maintain an equipment operating log on or near the unit at all times.

In addition, equipment owners are expected to perform scheduled maintenance on the engine(s) as recommended by the original equipment manufacturer (OEM) and retain records of completed maintenance tasks. The equipment owners must be able to provide copies of maintenance records to the NASSCO Environmental Engineering Department within 5 calendar days upon request.

Pollution Prevention

State and local regulations require owners and operators of diesel engines and associated emissions control devices to maintain them in accordance with manufacturer's specifications. The equipment must be kept in good condition to prevent release of excess emissions, leaks, or spills, and operated in accordance with APCD Rule 50 prohibiting visible emissions.

Furthermore, engines with fuel/oil capacities greater than 55 gallons of oil or fuel and those operating near sensitive spill pathways (such as onboard a vessel, on a pier/berth, or on the floating drydock) require secondary containment.

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), operators must immediately shut down the equipment until the problem is resolved.

Spills or Environmental Releases

In accordance with NASSCO's BMP #102, NASSCO employees and contractors must immediately report spills, releases of chemicals, and visible emissions (longer than 3 minutes) to NASSCO Security at (619) 544-8401.

After the Work is Completed

Compliance Certification and Monthly Usage Reporting

At the end of each month, all companies operating portable non-road diesel engines 50 hp and greater at NASSCO must certify their compliance status using a "Title V Monthly Air Compliance Certification Form".

Using the reporting form provided, the companies must also submit a summary report of the engines' daily runtime in hours and an estimate of fuel usage to the Environmental Engineering Department 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.