

# The 100 Hour Exemption

NESHAP CI RICE Rule Workshop

May 4, 2010

# Non-emergency use of Emergency Engines

- Does not impact engines with required emission controls that are used for general purposes
- Involves any engine which has been segregated solely for Emergency Use.

# Annual Permitted Uses for 100 Hrs

- Readiness Testing
- Maintenance Checks
- Requirements
  - Must be recommended by
    - Federal, State or **LOCAL** Government, or
    - The manufacturer or vendor of the engine, or
    - The insurance company associated with the engine
  - Must retain records on why the engine was operated and how it was operated to not violate the cap

# Non Emergency Purposes

- Other uses up to 50 hours of the 100 total hours allotted
- However you may not use the power to generate revenue:

*“cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity”*

# Demand Response

- Up to 15 hours of the 50 hours for non-emergency use
- Can only be authorized by the RTO or other balancing authority
- Specific conditions must be met by the RTO before use
- You can only operate 30 minutes prior to the time the emergency is expected to occur and must terminate immediately when notified that the condition has passed.

# SUMMARY – 100 Hour Exemption

- Up to 100 hours can be used for readiness testing and maintenance checks
- Of the 100 hours, up to 50 hours can be used for non-emergency usage as long as no revenues are derived
- Of the cited 50 hours, 15 hours can be allocated to a bona fide RTO Demand Response Program for which revenues could be received
- In no case can all of these uses exceed 100 hours per year – or you could face CAA fines or loss of emergency status.