



**COMPLIANCE ASSISTANCE BULLETIN**  
June 2021

**Important Information About Operation of Emergency Standby Engines Under Demand Response Programs**

The District has recently received several inquiries from operators of emergency standby engines regarding the legality of powering their facility with their engine/generator(s) under non-emergency conditions. In some cases, these operators have been solicited by their local utility, the Independent Systems Operator (ISO), or some intermediate entity, and offered monetary compensation for operating their engines at times when the state’s electrical power supply is expected to lag behind power demand.

Operating emergency standby engines under such conditions is specifically prohibited by our regulations, and therefore is **not** legal. To operate under conditions other than emergency, your Air Pollution Control District permit must be modified to **specifically** allow operation during “voluntary curtailment” or “demand relief” programs. In order to qualify for such operation, your engine may be required to meet more stringent emissions limits than currently required by your permit, which may require the installation of costly exhaust treatment equipment. If you would like to modify your permit appropriately, contact your regional Small Business Assistance at one of the offices listed below.

Operation of emergency standby engines under demand relief or voluntary curtailment programs of any kind, without first obtaining and complying with the appropriate permit requirements, is illegal and subject to fines or civil penalties.

Please note that, because demand for electricity peaks on the hottest days of the summer – the same conditions that cause air pollution problems – operation of these engines under a demand relief program causes increases in smog-causing pollutants on the very worst air pollution days of the year. In addition, diesel combustion emissions are known to be especially toxic and harmful to human health, and increases in these pollutants during these stagnant weather conditions creates the potential to cause serious health hazards.

**Small Business Assistance**

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