



MONTEREY BAY AIR RESOURCES DISTRICT

24580 Silver Cloud Court, Monterey, CA 93940

Guidance for Emergency Generator Use and Public Safety Power Shutoffs

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Wildfires are more destructive and deadlier than in the past, and the threat of wildfires is more prevalent throughout the state for a variety of reasons. As a result of these fires and evaluating all means to avoiding them, state investor-owned electric utilities, including Pacific Gas & Electric, have the authority to shut off electric power, referred to as Public Safety Power Shutoffs (PSPS), to protect public safety under California law, [California Public Utilities Code (PU Code) Sections 451 and 399.2(a)]. The PSPS is a preventative measure that the utility company can choose to utilize if they believe that there is an imminent and significant risk that strong winds may topple power lines or cause major vegetation-related issues resulting in increased wildfire risk. This guidance is intended to help understand the Monterey Bay Air Resources District's (MBARD) requirements for operating engines for backup power during PSPS events.

Many businesses and permitted facilities have expressed concerns about being without power for extended periods of time and have had questions regarding the usage of backup electrical generators powered by internal combustion engines. While it is generally permissible to use generators, if the engine powering the generator is 50 horsepower or greater, a state registration or MBARD permit as discussed below is needed prior to commencing operation. There are also two possible options for the type of backup generator as discussed below; (1) portable, typically a rented unit or (2) stationary, a unit designed to stay in one location or remains in one location for greater than 12 consecutive months.

Portable Units

A portable unit means the generator is capable of being carried or moved from one location to another such as on skids or a platform. Consistent with guidance provided by the California Air Resources Board (CARB), PSPS events are considered unforeseen interruptions of electrical power from the utility. Therefore, after a specific potential PSPS has been announced for a location, a CARB registered portable generator may be brought onsite and used during any associated power shutoff. The registered portable generator may only remain onsite for 12 months or less. If a source keeps the portable generator in an operational configuration for emergency backup power, for more than 12 consecutive months, the source must apply for a

permit for a stationary backup generator. Please contact MBARD if you have questions, (831)647-9411.

In the event a registered portable generator cannot be procured, CARB has provided guidance that PSPS events generally qualify as Emergency Events, and therefore the use of unregistered portable engines may be allowed for the duration of a PSPS event – but only if necessary to alleviate a threat to public health and safety. An unregistered portable generator may be operated during an Emergency Event only if the following conditions are met:

- The engine to be used is certified to meet a California or federal emission control standard;
- The owner or operator demonstrates that there is an immediate temporary need to operate the engine to help alleviate a threat to public health and safety that is the result of a reasonably unforeseen event, that is beyond the control of the owner or operator;
- The owner or operator notifies CARB within 24 hours of commencing operation by submitting a [Form 40](#) (Notification of Operation in an Emergency Event); and
- The engine is operated only for the duration of the Emergency Event, or up to 12 months, whichever comes first.

In response to receiving a [Form 40](#) submittal, CARB, in consultation with the local air district, may refute that an Emergency Event exists, in which case operation of the engine must cease immediately. An unregistered portable engine may only remain onsite for less than 12 months.

An unregistered, certified engine may be stored and not hooked up in an operational configuration for 12 months or less and only operated for an Emergency Event if necessary to alleviate a threat to public health and safety with submission of a Form 40. If a stationary source intends to maintain the portable unit in an operational configuration for emergency backup power, the stationary source must apply for a permit for a portable backup generator. Please contact MBARD if you have questions, (831)647-9411.

Stationary Units

A stationary unit means the generator is designed to stay in one location such as attached to a foundation, or if not so attached, resides at the same location for more than 12 consecutive months. It is important to note that while it is permissible to install stationary generators, if the engine powering the generator is 50 horsepower or greater a permit from MBARD is required prior to installation of the generator.

Facilities with a valid stationary emergency engine permit from MBARD can operate the engine during a PSPS event as long as the operation complies with all permit conditions.

Please also note that a portable or stationary engine powering the generator will have to meet Best Available Control Technology (BACT) requirements, see [Engine Requirements](#). It is recommended that you contact MBARD prior to purchasing a generator to understand the applicable requirements and ensure you do not purchase a unit that is illegal to install or operate. If you are looking to install a generator, you must fill out and submit a [permit application](#) along with the appropriate supplemental form, fees, and receive an MBARD issued Authority to Construct permit prior to installing the generator. The generator permit will include, but is not limited to, conditions limiting non-emergency usage and recordkeeping requirements.

NOTES:

- Generators with engines less than 50 horsepower do not require a permit.
- Generators installed at residential structures (dwelling for not more than four families) do not require a permit.

Example Scenarios and Permitting Determinations

	Scenario	Permitting Determination
A	Full-time or as-needed power to any building, structure, or operation via a portable generator, powered by a combustion engine rated at less than 50 brake horsepower.	No Permitting Required
B	Full-time supplemental power to any building, structure, or operation via a permanently installed stationary generator, powered by a combustion engine rated at 50 brake horsepower or greater. <i>Example: A genset that is permanently affixed to a concrete pad or foundation and is hardwired into a building, structure, or operation which requires electrical power.</i>	District Permit Required
C	Full-time supplemental power to any building, structure, or operation via a portable generator, powered by a combustion engine rated at 50 brake horsepower or greater. <i>Example: A portable genset that is capable of being plugged into a building, structure, or operation and is staged on-site and connected to a transfer switch with the ability to provide immediate backup power.</i>	District Permit Required
D	As-needed supplemental power to any building, structure, or operation via a portable generator, powered by a combustion engine rated at 50 brake horsepower or greater. <i>Example: A portable genset that is capable of being plugged into a building, structure, or operation which has been modified to accept external power, but genset is stored at an offsite location and only brought on-site and connected when a PSPS is imminent.</i>	PERP Registration Allowed
E	As-needed supplemental power to any building, structure, or operation via a portable generator, powered by a combustion engine rated at 50 brake horsepower or greater, during the failure of a District-permitted stationary emergency generator.	* PERP Registration Allowed with Special Considerations

	Scenario	Permitting Determination
	<p><i>Example: A portable genset that is capable of being plugged into a building, structure, or operation that is brought in to provide emergency power where a District-permitted emergency engine has failed. Staging or storage of the unit is not distinguished; however, the unit may not be permanently hardwired.</i></p>	
F	<p>As-needed power to a building, structure, or operation using a portable generator, powered by a combustion engine rated at 50 brake horsepower or greater, during maintenance and repair operations or electrical upgrades to existing infrastructure which requires the use of temporary power.</p> <p><i>Example: A portable genset that is capable of being plugged into a building, structure, or operation that is brought in to provide power during the maintenance and repair of electrical lines or other existing hardware where utility line power must be shut off.</i></p>	PERP Registration Allowed
G	<p>As-needed power to temporary equipment that is not a building, structure, or other type of stationary source using a portable generator, powered by a combustion engine rated at 50 brake horsepower or greater.</p> <p><i>Example: A portable genset that is used to power construction lights, air compressors, or chippers/grinders .</i></p>	PERP Registration Allowed