

# Air Quality Update

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## CARB'S PORTABLE EQUIPMENT REGISTRATION PROGRAM

The Portable Equipment Registration Program (PERP) is a voluntary statewide program administered by the California Air Resources Board (CARB) to register portable equipment and engines. In certain circumstances, PERP registration may be considered as an alternative to obtaining a permit from a local air district for portable units. In other words, it may be possible and advantageous for a facility to obtain a PERP registration in lieu of a District permit if warranted by the situation.

There are two types of PERP registration. The first type is for internal combustion (IC) engines of 50 horsepower or greater, and the second type is for equipment units. PERP defines "equipment units" as equipment that emits only PM<sub>10</sub>. Examples of equipment eligible for PERP registration include air compressors, generators, concrete pumps, tub grinders, wood chippers, water pumps, drill rigs, pile drivers, rock drills, abrasive blasters, aggregate screening and crushing plants, concrete batch plants, and welders.

PERP registration is valid for 3 years and includes a registration document with conditions and an identification sticker facilitating quick visual inspection. PERP-registered equipment may operate throughout the state without requiring local air permits and subject to the operating conditions.

If the operator is compliant, the CARB is required by the regulation to issue the PERP registration within 90 days of receipt of a complete application, although typically the PERP registration will be issued within 30 days.

Although PERP registration is usually less expensive and requires only triennial renewal, caution is advised for each operation, as PERP is treated differently among air districts. It should be noted that the PERP regulation specifically disallows the registration of any engine that may "qualify as part of a stationary source." Additionally, engines cannot be simultaneously PERP-registered and permitted by a local air district. Enforcement of PERP is the responsibility of the local districts, not the CARB. Each air district has different challenges within their air basin, and the PERP regulations allow each district the authority to determine whether an operation qualifies for PERP or requires permitting at the local district level. Questions regarding PERP validity should be directed to the individual "home" district before commencing operation.

It is important to note that a portable diesel-fired compression ignition engine, whether PERP-registered or district-permitted, needs to comply with the applicable portable IC engine Airborne Toxic Control Measure (ATCM) standards.

*For additional information, please refer to the BAAQMD link below:*

<http://www.baaqmd.gov/Divisions/Engineering/Equipment-Registration/Portable-Equipment.aspx>

## Air Quality Tip

*When considering the purchase or replacement of any internal combustion engine (particularly a diesel engine), be sure to carefully evaluate potentially applicable permitting requirements. Depending on whether the engine will be stationary or portable, diesel or spark-ignited, emergency, prime, or other category, the requirements are complex and an engine selection mistake can be difficult and expensive to fix. Many older engines and some new ones can no longer be permitted.*

BAAQMD Engine Permitting:

<http://www.baaqmd.gov/Divisions/Engineering/Engine-Permits.aspx>

CARB Diesel Programs:

<http://www.arb.ca.gov/diesel/statport.htm>

## Upcoming Training Offered by Yorke Engineering:

Bay Area Air Quality Permitting and Compliance Seminar: September 12 and 13, 2012

<http://www.yorkeengr.com/AirQualityClasses.htm>

## Upcoming Due Dates:

- Title V – Semi-Annual Monitoring (SAM): Every 6 Months; Due on the Last Day of the Month After the End of the Reporting Period\*
- Title V – Compliance Certification: Annually; Due 30 Days After Reporting Period End Date\*
- Title V – Application for Permit Renewal; Due 180 Days Prior to Permit Expiration\*
- CARB GHG Verification 9/1/12
- Cap & Trade CITSS Reg. 9/1/12

All due dates listed are the statutory dates; sometimes dates are extended when they fall on a weekend/holiday.

\*Your due dates are typically listed in Section I of your Title V permit.

## BAAQMD RULE CHANGES ADOPTED

For full details on rule adoption changes below, go to:

<http://www.baaqmd.gov/Divisions/Planning-and-Research/Rule-Development/Current-Regulatory-Public-Hearings.aspx>

### ■ Regulation 2 Rule 1 – *Permits: General Requirements*

Recently amended on April 18, 2012, Regulation 2 Rule 1 (Rule 2-1) is aimed at providing general guidance, exemptions, and definitions associated with obtaining air permits. The modifications in the 04-18-2012 version of the rule were made to accommodate the recently adopted Regulation 8 Rule 53 for Vacuum Producing Trucks.

### ■ Regulation 8 Rule 53 – *Organic Compounds: Vacuum Truck Operations*

Adopted on April 18, 2012, Regulation 8 Rule 53 (Rule 8-53) is a new rule designed to reduce volatile organic compound (VOC) emissions from the operation of vacuum trucks used to collect and transport organic liquids in refineries, bulk plants, bulk terminals, marine terminals, and organic liquid pipeline facilities. For any loading event, the rule limits the VOC emissions to a maximum total organic compound (TOC) vacuum exhaust concentration of 500 ppmv as methane. An alternative to meeting the 500 ppmv limit is to reduce the VOC emissions by at least 95%. Liquid and vapor leak standards are also included in the new rule. Rule 8-53 standards will be enforced effective April 1, 2013.

### ■ Regulation 3 – *Fees*

On June 6, 2012, the BAAQMD Board of Directors conducted a public

hearing to consider and ultimately approve revisions to Regulation 3 Fees. The new fees for filing a permit application, emissions banking application, or permit renewal have increased by over 6.5%. Additionally, the fees for the source schedules will be increased for all schedules, except M (Major Source), N (Toxic Inventory), T (GHG), and U (Indirect Source). The new fee regulation became effective on July 1, 2012. For further detailed information, see:

<http://www.baaqmd.gov/Divisions/Planning-and-Research/Rules-and-Regulations.aspx>

## BAAQMD RULE CHANGES PROPOSED

For full details on proposed rule changes below, go to:

<http://www.baaqmd.gov/Divisions/Planning-and-Research/Rule-Development/Rule-Workshops.aspx>

### ■ Rule 2-1 – *Permits: General Requirements*

Additional modifications to Rule 2-1 are being considered in tandem with planned modifications to Regulation 2 Rules 2, 4, and 6 and are designed to comply with federal mandates for nitrogen dioxide (NO<sub>2</sub>), particulate matter less than 2.5 micrometers (PM<sub>2.5</sub>), greenhouse gases (GHGs), Prevention of Significant Deterioration (PSD), and Title V (Major Facility) permitting.

One significant proposed amendment to Rule 2-1 includes the addition of PM<sub>2.5</sub> to the list of regulated (criteria) air pollutants. Further rule

clarification is also planned to improve rule understanding and use.

### ■ Rule 2-2 – *New Source Review*

Proposed Rule 2-2 amendments are designed to incorporate new federal PSD requirements, which include the 1-hour average NO<sub>2</sub> standard, the 24-hour average and annual average PM<sub>2.5</sub> standards, and new GHG PSD review requirements.

### ■ Rule 2-4 – *Emissions Banking*

The proposed Rule 2-4 amendments include the addition of PM<sub>2.5</sub> as a listed bankable pollutant and provisions for determining PM<sub>2.5</sub> fraction of existing banked PM<sub>10</sub> credits.

### ■ Rule 2-6 – *Major Facility Review*

Proposed Rule 2-6 amendments result from the federal *Tailoring Rule*, which established Title V Major Facility Review thresholds based on GHG emissions. Under Title V permitting, GHG becomes a regulated pollutant if the facility has the potential to emit 100,000 tons per year or more of CO<sub>2</sub>e.

### ■ Regulation 2 Related Issue

The inclusion of PM<sub>2.5</sub> in these rules has brought up the question of PM<sub>2.5</sub> enforceability. Currently, there is no agreed-upon analytical sampling and testing methodology for PM<sub>2.5</sub>. Current available methodologies have not demonstrated an acceptable reproducibility and standard error for PM<sub>2.5</sub> analysis.

*Yorke Engineering, LLC specializes in air quality and environmental consulting for stationary and mobile sources, including dispersion modeling, health risk assessments, permitting, emission inventories, air quality compliance systems, etc. Yorke Engineering has assisted over 200 customers, including a wide variety of industrial facilities and government organizations throughout California.*