

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 that are subject to permitting. Unlike permit requirements at the local district, which are mandatory, PERP is voluntary and registration is not required for any equipment. In certain circumstances, PERP registration may be used as an alternative to obtaining a permit from a local air district for portable units.

There are two types of PERP registration. The first type is for IC engines of 50 horsepower or greater, and the second type is for equipment units. PERP defines "equipment units" as equipment that emits only PM10. 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 three years. It includes a registration document with conditions and an identification sticker that allows air district inspectors to determine from a distance that the equipment is registered. PERP registration fees are usually less expensive, compared to regular district permit fees. PERP-registered equipment may operate throughout the state, often without obtaining local air district permits. This is a major benefit for

portable equipment or portable IC engine owners who move equipment from one air district to another, as there may be no need to obtain individual permits for each air district.

The PERP regulation requires the CARB to issue a registration within 90 days of receipt of a complete application. The registration process typically takes about 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. 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. As a result, PERP is applied inconsistently throughout the state. Some air districts have a district-wide policy for PERP operations within their jurisdiction. However, this policy would not apply once the unit leaves that district. The CARB has no authority to overwrite a district decision on PERP treatment within the district's jurisdiction. Questions regarding PERP validity should be directed to each individual district before commencing operation.

It is important to note that a diesel-fired compression ignition engine, whether PERP-registered or district-permitted, needs to comply with portable engine Airborne Toxic Control Measure (ATCM). Portable engine ATCMs will be enforced by the CARB. Diesel-fired compression ignition engine fleet owners are

required to comply with reporting and recordkeeping requirements set forth in the portable engine ATCM.

For more information, see the South Coast Air Quality Management District's (SCAQMD's) policy at:
<http://www.aqmd.gov/comply/PERP.htm>

Air Quality Tip

Annual Emission Reports (AERs) not reported to the SCAQMD by the March 1 reporting deadline are subject to a 5% late penalty for the first 30 days, a 15% late penalty for facilities reporting within 90 days, and further increasing fees thereafter.

Upcoming Training Offered by UCI or Yorke Engineering:

South Coast Air Quality Permitting and Compliance Seminar: May 8 and 9, 2012
<http://www.yorkeengr.com/classes.htm>

Selected Upcoming Due Dates:

- SCAQMD RECLAIM APEP 2/29/12 (Cycle 1 RECLAIM Facilities)
- SCAQMD AER 3/1/12 (Annual Emission Report)
- DTSC Biennial Report 3/1/12 (Hazardous Waste Reporting)
- CARB Rule 1415.1 3/1/12 (Refrigeration Registration Systems > 2,000 lbs.)
- USEPA GHG 3/31/12 (Mandatory Reporting)
- SCAQMD Rule 1415 4/1/12 (Air Conditioner Registration)
- SCAQMD Rule 1415.1 4/1/12 (Refrigeration Registration Systems < 2,000 lbs., > 50 lbs.)
- CARB GHG Report 4/10/12 (Abbreviated Reporting)
- Haz. Mat. Business Plans Various (Cert. Unified Program Authority)

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

SCAQMD RULE CHANGES ADOPTED

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

<http://www.aqmd.gov/rules/recentrules.html>

- Rule 463: *Organic Liquid Storage*

Recently amended on November 4, 2011, Rule 463 is aimed at emission reductions of Volatile Organic Compounds (VOCs) from the storage of organic liquids in stationary aboveground tanks. The rule applies to any aboveground stationary tank with a capacity of 19,815 gallons or greater used for the storage of organic liquids and any aboveground tank with a capacity between 251 and 19,815 gallons used for the storage of gasoline. The amended rule establishes alternative testing methods for determining tank vapor pressure.

Specific guidance provisions for vapor pressure testing is included for organic liquids stored at ambient temperature with a true vapor pressure of greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions and shall be determined by ASTM Method D-93-10a. Organic liquids stored above ambient temperature with a true vapor pressure of greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions shall be determined as those whose volume percent evaporated is greater than 10% evaporated at an adjusted temperature as determined by ASTM Method D-86.

A reduction in the preexisting vapor-tight condition threshold from 1,000 to 500 ppm is included to reflect current detection methods and limits in the amended rule. A vapor-tight cover is now required on any tank gauging or sampling device on a tank vented to a vapor recovery system.

The amended rule also includes additional details related to the Self-Inspection and Maintenance Plan for floating roof tanks and requires the maintenance of a current or revised Inspection and Maintenance Plan approved by the Executive Officer. All compliance inspection reports and documents are required to be submitted to the Executive Officer electronically or by hard copy within five working days of completion of the self-inspection. Exemptions exist for drain-dry breakout tanks subject to the provisions of Rule 1149.

SCAQMD RULE CHANGES PROPOSED

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

<http://www.aqmd.gov/rules/proposed.html>

- Proposed Amended Rules 1162 and 1132: *Polyester Resin Operations, and Further Control of VOC Emissions From High-Emitting Spray Booth Facilities*

Rule 1132 proposed amendments include lowering the percent by weight of monomers from 37% to 33% in non-white-pigmented gel coat. Rule 1162 proposed amendments include calculating the monomer percent by weight of gel coat not covered previously in the existing rule. Material requirements have been revised to comply with the addition of monomer content percentages being proposed for gel coats. Specific requirements have also been established for the mixing

and storage of containers holding gel coat or resin materials, along with requirements for cleanup solvents used in remote reservoir cleaners.

- Rule 1107: *Coating of Metal Parts and Products*

The proposed amendments aim to reduce VOC emissions from the coating of metal parts and products by establishing lower VOC limits for general, prefabricated architectural, and primer coatings at industrial sites engaged in metal coating operations. Rule 1107 establishes general emission limits to reduce VOCs emitted during the preparation and coating of metal parts and products during the drying phase.

SCAQMD ERC INFORMATION

Emission Reduction Credit (ERC) prices are continuing to decline steadily. Below is the most recent ERC price information for the SCQAMD provided by Evolution Markets™.

Table 1 – SCAQMD ERC Price List

Pollutant	Zone	Bid/lb./day	Ask/lb./day
ROG	Coastal	\$4,500	\$6,500
ROG	Inland	\$4,500	\$6,500
PM10	Coastal	\$90,000	\$150,000
PM10	Inland	\$90,000	\$150,000
NO _x	Coastal	\$10,000	\$50,000
NO _x	Inland	\$10,000	\$40,000
SO _x	Coastal	\$50,000	\$100,000
SO _x	Inland	\$50,000	\$100,000

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.