

Air Quality Update

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February 10, 2012 – SJVAPCD

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 San Joaquin Valley Air Pollution Control District's (SJVAPCD's) policy at:

http://www.valleyair.org/policies_per/Policies/SP-21502-24-11.pdf

Air Quality Tip

As the compliance deadlines for the Truck and Bus Regulation near, San Joaquin Valley is administering several incentive programs for eligible owners of heavy-duty diesel trucks. These programs aim to help offset the cost of upgrading to cleaner technologies through early truck replacement and diesel particulate filter installation.

Upcoming Training Offered by Yorke Engineering:

San Joaquin Valley Air Quality Permitting and Compliance Seminar:
April 24 and 25, 2012

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

Upcoming Due Dates:

- Title V – Report of Required Monitoring Semi-Annually*
- DTSC Biennial Report (Hazardous Waste Reporting) 3/1/12
- USEPA GHG (Mandatory Reporting) 3/31/12
- CARB GHG Report (Full Reporting) 4/10/12
- CARB GHG Report (Power Entities and Abbreviated Reporting) 6/1/12

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

*The due date is based on the issuance date of the Title V permit.

CARB'S TRUCK AND BUS REGULATION UPDATES

The CARB has recently issued an advisory to extend the reporting deadline of the Truck and Bus Regulation. The deadline is being extended from January 31 to March 30, 2012, to give fleet owners more time to submit their fleet information. This reporting requirement applies to owners of trucks and buses with a Gross Vehicle Weight Rating (GVWR) greater than 26,000 lbs, who choose the phase-in option to comply with the Truck and Bus Regulation. The phase-in option allows fleets to decide which vehicles to retrofit or replace instead of having to meet the compliance schedule by engine model year as required by the regulation. Table 1 below summarizes the engine model year compliance schedule for heavier trucks and buses.

Table 1 – Engine Model Year Schedule

Engine Year	Requirement From January 1, 2012 (Heavier Trucks) (Truck and Bus Regulation)
Pre-1994	No requirements until 2015, then 2010 engine
1994-1995	No requirements until 2016, then 2010 engine
1996-1999	PM filter from 2012 to 2020, then 2010 engine
2000-2004	PM filter from 2013 to 2021, then 2010 engine
2005-2006	PM filter from 2014 to 2022, then 2010 engine
2007-2009	No requirements until 2023, then 2010 engine
2010	Meets final requirements

CARB'S REFRIGERANT MANAGEMENT PROGRAM

On January 1, 2011, CARB approved the Refrigerant Management Program (RMP) to minimize emissions of high Global Warming Potential (GWP) refrigerant from stationary,

nonresidential refrigeration equipment. The RMP applies to nonresidential facilities with a stationary refrigeration system that uses more than 50 lbs. of a high-GWP refrigerant, such as HFCs, CFCs, and HCFCs. These systems are typically used in supermarkets, distribution facilities, cold storage warehouses, food processing plants, and process cooling operations. Carbon dioxide and ammonia-based refrigeration systems are exempt from the RMP. The RMP focuses on leak inspection and repair. Registration is also required for facilities that have any refrigeration system subject to the RMP. The deadlines for the required reporting are summarized in Table 2 below.

Table 2 – RMP Registration Schedule

Refrigeration System	Registration Schedule
Large System (≥2,000 lbs.)	March 1, 2012
Medium System (≥200 to 2,000 lbs.)	March 1, 2014
Small System (>50 to 200 lbs.)	March 1, 2016

The SJVAPCD conducted a public meeting on August 24, 2011, to discuss their proposal to develop a local program to assist in implementing the RMP. The meeting explored the possibility of a joint enforcement approach for the RMP, with the district implementing the program for local businesses in San Joaquin Valley and the CARB implementing the RMP for companies with facilities throughout the state.

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.

SJVAPCD RULE CHANGES ADOPTED

For full details on rule adoptions, go to:

http://www.valleyair.org/rules/rules_recently_adopted.htm

- Rule 2301: *Emission Reduction Credit Banking*

On January 19, 2012, Rule 2301 was amended to provide a mechanism to preserve voluntary Greenhouse Gas (GHG) emissions. The amended rule allows the use of banked GHG emission reductions for any purpose and does not impose any restrictions on their use. One of the potential uses of banked GHG emission reductions is as mitigation in the California Environmental Quality Act (CEQA) process. SJVAPCD banked GHG emission reductions are not currently allowed for use as compliance offsets in the CARB Cap-and-Trade program, as SJVAPCD is not a CARB-approved GHG registry administrator yet. The GHG emission reductions to be banked with the district under the amended Rule 2301 can be divided into two categories: Non-Protocol GHG Emission Reductions and Protocol-Based GHG Emission Reduction Credits. Applications to bank GHG emission reductions will take the same form as applications that are currently used for the more traditional criteria pollutant emission reductions and will be subject to the existing fee structure in Rule 3060 (Emission Reduction Credit Banking Fee).