



The Port of
LONG BEACH
The Green Port

September 21, 2011

Clerk of the Board
California Environmental Protection Agency
Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: Proposed Amendments to the Regulation for Mobile Cargo-Handling
Equipment at Ports and Intermodal Rail Yards

Dear Sir/Madam:

The Port of Long Beach (Port) appreciates the opportunity to comment on the proposed amendments to the California Air Resources Board (ARB) regulation for mobile cargo-handling equipment at ports and intermodal rail yards. The comments included herein pertain specifically to the updated cargo-handling equipment emissions inventory developed to support the amendments to the regulation.

As you may know, the ports of Long Beach and Los Angeles have developed a Clean Air Action Plan (CAAP) to reduce air quality impact from port-related mobile source operations. This plan has short-term and long-term goals to reduce air emissions. In the CAAP, the Port made a commitment to develop annual air emissions inventories. Using a baseline year of 2005, the annual emissions inventories serve as the primary tool for the Port to track the progress of CAAP measures and regulations implemented to reduce port-related air emissions. The air emissions inventories are developed in coordination with a technical working group (TWG) comprised of representatives from the ports of Long Beach and Los Angeles, and air regulatory agencies including the ARB, U.S. Environmental Protection Agency Region 9, and South Coast Air Management District. Through collaboration with the TWG, the ports seek the consensus of the air regulatory agencies to provide acknowledgement that the ports' inventories are prepared in accordance with the latest methodologies and data to ensure consistency between the statewide emissions inventory and the Port's annual emissions inventories.

Based on a review of the updated inventory, in order to estimate statewide emissions from cargo-handling equipment, ARB has combined the population of equipment and activity data from various ports to develop category averages. This differs from the Port's approach in which the annual inventories are calculated at a detailed, individual equipment level, providing a more accurate estimate of emissions. As a result, even with the use of the same data and emissions calculation methodology, the Port's emissions estimates and ARB's emissions estimates will likely differ and impact the comparison of emissions reductions

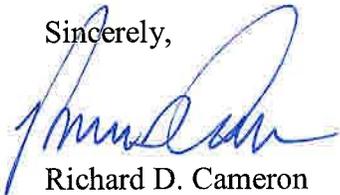
under the upcoming State Implementation Plan (SIP) and CAAP. It is recommended that the Port and ARB work cooperatively to account for these differences during future SIP and CAAP updates.

The Port has also noted a change in ARB methodology to determine deterioration rates for cargo-handling equipment. While ARB continues to use on-road heavy-duty truck emissions data as the basis to determine deterioration rates for cargo-handling equipment, ARB has updated the methodology to estimate the increase in emissions from cargo-handling equipment as they age. The previous ARB-suggested methodology (and the current methodology used by the Port in its annual port-wide emissions inventories) determines the deterioration rate of equipment based on the "useful life" of equipment, by equipment type. This methodology translates into a steeper deterioration rate for equipment types with a shorter useful life, and a slower deterioration rate for equipment types having longer useful life.

In the updated cargo-handling equipment emissions inventory, ARB assumes that full deterioration of equipment occurs at 12,000 hours of use. This assumes that the rate of deterioration is the same for all equipment regardless of equipment useful life. While the Port understands ARB's revised approach to determine the deterioration rate of cargo-handling equipment, and ARB's desire to calculate deterioration using a methodology that is consistent with that used for other source categories, it is the Port's opinion that fixing deterioration at 12,000 hours of use is overly conservative and does not reflect the useful life or maintenance practices of terminal operators at the Port, nor does it accurately reflect the actual rate of deterioration of cargo-handling equipment operating at the Port. Terminal operators keep their equipment well maintained, and perform regular equipment maintenance according to manufacturer's specifications. It is therefore recommended that the Port and ARB work together to develop a more accurate deterioration profile of cargo-handling equipment operating at the Port of Long Beach.

The Port appreciates the opportunity to comment on the proposed amendments to the regulation, and looks forward to the continued cooperation and support of ARB to improve air quality and future emissions inventories. If you have any questions, please feel free to contact Allyson Teramoto of my staff at (562) 590-4160.

Sincerely,



Richard D. Cameron
Director of Environmental Planning

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