

## **Comment 1 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Bob

Last Name: From Sandiego

Email Address: robertchilango@hotmail.com

Affiliation:

Subject: PERP should be discontinued.

Comment:

It is very concerning that ARB regulations may have been made and based on reports by false science or out right liars. I do not own any potable diesel engines. But bring to question that all these regulations for are money generating or political bias reasons. Rather then based on true facts and pollution reduction.

I purpose that no regulations can bemade that will add any cost burden to any person or company with current engines. Regulations can only apply to future engines made, purchased or imported after 2010.

Thank You.

Industry News  
Credential Flap To Delay CARB Diesel Regs?  
December 4, 2009

Assorted reports from California say that a member of the state's Air Resources Board is calling for a suspension of new diesel emissions rules for trucks and buses because of falsified credentials of a researcher that collected information for the diesel standard.

Reportedly, the researcher, Hien Tran, compiled research on health effects of diesel particulate matter, data regulators considered when adopting the clean air standards a year ago.

Now information has surfaced that Tran falsified his credentials, claiming to have a doctorate from the University of California, Berkeley, but later admitting his degree was from Thornhill University, an online, unaccredited institution. He was demoted and suspended for 60 days without pay.

CARB member John Telles is calling for the rules to be set aside until the report is reviewed by independent researchers.

[View Industry News](#)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-12-11 18:07:11

No Duplicates.

## **Comment 2 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Jeff

Last Name: Wood

Email Address: jwood@hawthornecat.com

Affiliation:

Subject: PERP information requirements

Comment:

The PERP Staff should supply a web based reporting system for rental companies to use so local districts can access the information they are claiming they need. There must be a resonable effort made by ARB to relieve the burdensome and costly task of paper work on business. The Staff should also build a fleet average calculator for fleets to use for the ATCM and any reporting requirements.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-12-18 10:33:36

No Duplicates.

### **Comment 3 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Cara

Last Name: Bandera

Email Address: Cara.Bandera@baesystems.com

Affiliation: BAE Systems SDSR

Subject: Comments Regarding PERP

Comment:

Please see the attached comments regarding the Portable Equipment Registration Program (PERP).

Sincerely,  
Cara Bandera  
BAE Systems SDSR

Attachment: [www.arb.ca.gov/lists/perp2010/3-perp\\_comments\\_official.pdf](http://www.arb.ca.gov/lists/perp2010/3-perp_comments_official.pdf)

Original File Name: PERP Comments Official.pdf

Date and Time Comment Was Submitted: 2010-01-05 06:38:37

No Duplicates.

## **Comment 4 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Charles

Last Name: Boyd

Email Address: chuck35@cinerepamps.com

Affiliation: Cinerep International, Inc.

Subject: PERP diesel engine replacement extension

Comment:

Due to current extrememy difficult economic conditions, I strongly urge approval of ARB Staff recommendation to extend replacement deadline for currently registered non-certified diesel engines until December 31, 2010.

In addition to this extension, I want to suggest a minor change to regulations which will have negligible impact on the environment while helping many small businesses and individuals in the Film Industry. This change would simply allow an existing compliance deadline for one category to also apply to a similar category of equipment used in the motion picture industry which utilizes the IDENTICAL off-road diesel engines. In the category identified as "OFF-HIGHWAY VEHICLES" non-certified diesel engines operated as part of small or medium size fleets are allowed more lenient compliance deadlines of 2015 for small fleets and 2013 for medium fleets. The category of equipment identified as "PORTABLE GENERATORS", which is so prevalent in the film industry, use the same off-road engines as are used in "OFF-HIGHWAY VEHICLES", however are not allowed the same, more lenient deadlines for small or medium size fleets. Considering that the identical engines are used in both categories and utilization hours as rental equipment should be very similar, I believe compliance deadlines should be the same for "PORTABLE GENERATORS" and "OFF-HIGHWAY VEHICLES" based on fleet size. This minor change would greatly assist small businesses such as mine in the current bad economy and would correct an apparent inequity in CARB regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-05 15:42:55

No Duplicates.

## **Comment 5 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Robert

Last Name: Hassebrock

Email Address: robert.hassebrock@weatherford.com

Affiliation:

Subject: PERP2010 Comments

Comment:

While we support the rule and will urge CARB to approve it we think that the proposed changes:

Are unfair to large business,

Rewards Skofflaws while ignoring the costs that historically compliant businesses have borne,

Is based upon a grossly overstated inventory that is not reflective of the real state of affairs in this depressed economy and,

Fail to address the fact that this rule and all other Diesel regulations are unsustainable and will result in the demise of many large and small businesses and associated jobs.

CARB should suspend enforcement of all Diesel Regs as an emergency order unless and until unemployment returns to less than 9%.

Attachment: [www.arb.ca.gov/lists/perp2010/7-wft\\_10-01\\_perp\\_letter\\_rev\\_1.pdf](http://www.arb.ca.gov/lists/perp2010/7-wft_10-01_perp_letter_rev_1.pdf)

Original File Name: WFT 10-01 PERP letter rev 1.pdf

Date and Time Comment Was Submitted: 2010-01-06 13:01:39

No Duplicates.

**Comment 6 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: James

Last Name: Thomas

Email Address: james.thomas@nabors.com

Affiliation: Nabors Well Services Co

Subject: Comments Regarding the PERP

Comment:

Please see the attached comments regarding the Portable Equipment Registration Program (PERP).

Sincerely,  
James Thomas

Attachment: [www.arb.ca.gov/lists/perp2010/8-carb\\_perp\\_letter\\_jan\\_04\\_2010.pdf](http://www.arb.ca.gov/lists/perp2010/8-carb_perp_letter_jan_04_2010.pdf)

Original File Name: CARB PERP letter Jan 04 2010.pdf

Date and Time Comment Was Submitted: 2010-01-07 15:40:17

No Duplicates.

## **Comment 7 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Doug

Last Name: Van Allen

Email Address: dvanallen@bjsservices.com

Affiliation: BJ Services Company USA

Subject: Comments on amendments to PERP & ATCM rule's

Comment:

Please see the attached letter to the board regarding changes to the PERP & ATCM for diesel fueled portable engines.

Attachment: [www.arb.ca.gov/lists/perp2010/9-perp\\_letter\\_1-7-10.pdf](http://www.arb.ca.gov/lists/perp2010/9-perp_letter_1-7-10.pdf)

Original File Name: PERP Letter 1-7-10.pdf

Date and Time Comment Was Submitted: 2010-01-08 09:35:04

No Duplicates.



## **Comment 8 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Miles

Last Name: Danforth

Email Address: miles-miles@sbcglobal.net

Affiliation: owner, Evergreen Arborists, Inc.

Subject: Portable engine regulation extension

Comment:

I am writing to voice my opinion on the portable engine restrictions. As a small business owner(8 employees)I have been struggling for years to comply with expensive calif. regulations. I recently purchased a \$40,000 brush chipper to comply with regs. and paid nearly \$3000 to continue using a chipper I bought new in 1998. That chipper is no longer allowed to operate, as is another one I own. Those 2 chippers are in excellent condition and I had planned on using them for about 15 years, as my usage is only 250 to 300 hours per year. It is the hours of use that should matter. I cannot afford to buy another \$40,000 chipper at this time, this type of equipment is financed over 5 years. If I cannot continue to use the old tier 0 chipper I will be forced to lay off 3 men. Don't forget who creates about 95% of the jobs in this country. It's not big corporations, it's guys like me willing to go through huge govt. regs. and continue to see profits decline and expenses go up every year. Please extend the tier 0,1,2 engines. Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-13 18:05:57

No Duplicates.

## **Comment 9 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: John

Last Name: Lastelic

Email Address: HBLastelic@aol.com

Affiliation: NONE

Subject: NO, Don't Want it

Comment:

This is killing the Construction Business, My Earthwork Contracting Friend has already Closed his Business after 35yrs because of all these rules this UNELECTED BODY had come up with!

Translation LESS TAX REVENUE for our BK state, Get a glue and stop this kind of JOB KILLING B.S. And you wonder why TX is doing so well!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-14 19:31:47

No Duplicates.

**Comment 10 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Grace

Last Name: Mangold

Email Address: gmangold@holtca.com

Affiliation: The CAT Rental Store

Subject: Comments to CARB rule change

Comment:

See attached comments to Perp2010

Attachment: [www.arb.ca.gov/lists/perp2010/13-carb\\_comments.pdf](http://www.arb.ca.gov/lists/perp2010/13-carb_comments.pdf)

Original File Name: CARB Comments.pdf

Date and Time Comment Was Submitted: 2010-01-18 09:25:26

No Duplicates.

## **Comment 11 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: David

Last Name: Mann

Email Address: vidmann@verizon.net

Affiliation:

Subject: PERP2010

Comment:

The drop in the bucket particulate matter reduction is not enough to warrant this heavy handed regulation. Please extend it for the immediate future and consider that the facts pertaining to this regulation were tainted by the self-serving individual that lied about his credentials. The board's credibility is at stake.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-18 19:56:17

No Duplicates.

## **Comment 12 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Christopher

Last Name: Brown

Email Address: browncd@co.mendocino.ca.us

Affiliation: MCAQMD

Subject: Vendor Reporting

Comment:

MCAQMD has concerns about curtailing vendor reporting. This information is particularly useful in finding those operators who are not in compliance with the voluntary PERP program and District Regulations. The District would like to encourage the Board to find a way to reduce the burden on the vendors while still providing the information needed to ensure enforcement is swift and fair.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-19 19:58:17

No Duplicates.

## **Comment 13 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: arleen  
Last Name: wallace  
Email Address: bizsmqu2@verizon.net  
Affiliation:

Subject: perp2010  
Comment:

NO

ALL THESE ITEMS SHOULD NOT HAVE TO BE REGISTERED

ITS LIKE YOUR DOING THESE THINGS TO PUT PEOPLE OUT OF WORK

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-20 14:43:45

No Duplicates.

## **Comment 14 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Kevin

Last Name: Mahan

Email Address: kwfact@pacbell.net

Affiliation:

Subject: Airborne Toxic Control Measure for Diesel Fuled Engines

Comment:

What a joke you people are. The people are NOT behind you and you will cause this state great harm. Take responsibility and get your priorities straight.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-20 15:45:52

No Duplicates.

## **Comment 15 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Karl

Last Name: Lany

Email Address: klany@scec.com

Affiliation: SCEC Air Quality Specialists

Subject: Proposed PERP Amendments Affecting Rental Fleets

Comment:

Historically, various provisions of the PERP regulation distinguished between owner-operated engines and those that are part of a rental fleet. The distinction is important because of the complexities of rental transactions and the relationship between the rental engine owner and the operator. The recently-proposed revisions to the PERP regulation continue to distinguish between rented engines and owner-operated engines, but in some cases may not adequately reflect the intricacies of rental transactions. The attached comments identify those areas where additional rule language will promote a more effective and equitable PERP.

Attachment: [www.arb.ca.gov/lists/perp2010/18-perp\\_comments.docx](http://www.arb.ca.gov/lists/perp2010/18-perp_comments.docx)

Original File Name: perp comments.docx

Date and Time Comment Was Submitted: 2010-01-21 20:34:38

No Duplicates.



## **Comment 16 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Michael

Last Name: Graboski

Email Address: msgraboski@speedtrail.net

Affiliation: American Rental Association

Subject: Comment on Board Agenda Item 10-1-2

Comment:

The attachment is the comment of the American Rental Association for the 1/28/2010 Board Meeting, Agenda Item 10-1-2, "Public Hearing to Consider the Adoption of Proposed Amendments to the Regulations Applicable to Portable Diesel Engines and Diesel Engines Used in Off-Road and On-Road Vehicles"

Attachment: [www.arb.ca.gov/lists/perp2010/19-comments\\_on\\_proposed\\_regulation\\_order-1-2010\\_\\_2\\_.pdf](http://www.arb.ca.gov/lists/perp2010/19-comments_on_proposed_regulation_order-1-2010__2_.pdf)

Original File Name: Comments on Proposed Regulation Order-1-2010 (2).pdf

Date and Time Comment Was Submitted: 2010-01-22 08:48:02

No Duplicates.

## **Comment 17 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Bill

Last Name: Gaines

Email Address: bgaines@transferflow.com

Affiliation: Transfer Flow Inc., Chico, CA

Subject: Comments on Portable Equipment Regulations

Comment:

Please read and review the comments in the attached document.

The CARB Board should address several changes to this regulation including altering the procedure to obtain an EO, utilizing current on-road data collection to validate in-use DPF performance, allowing the retro-fit of Tier 0 Portable Equipment and utilizing proven and tested on-road DPF components for use on Off-Road, Portable and Stationary Equipment.

The attached letter provides specific details to the aforementioned recommended changes.

Attachment: [www.arb.ca.gov/lists/perp2010/21-10-01-25\\_comments\\_on\\_carb\\_portable\\_regulations.pdf](http://www.arb.ca.gov/lists/perp2010/21-10-01-25_comments_on_carb_portable_regulations.pdf)

Original File Name: 10-01-25 Comments on CARB Portable Regulations.pdf

Date and Time Comment Was Submitted: 2010-01-25 13:40:50

No Duplicates.

**Comment 18 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Richard

Last Name: Stedman

Email Address: Non-web submitted comment

Affiliation:

Subject: Monterey Bay Unified Air Pollution Control District

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/perp2010/22-perp20100001.pdf](http://www.arb.ca.gov/lists/perp2010/22-perp20100001.pdf)

Original File Name: perp20100001.pdf

Date and Time Comment Was Submitted: 2010-01-26 09:44:19

No Duplicates.

**Comment 19 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Randall

Last Name: Venerable

Email Address: generatormail@sbcglobal.net

Affiliation:

Subject: Proposed Regulations Effect on Small Business

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/perp2010/23-carb\\_letter.doc](http://www.arb.ca.gov/lists/perp2010/23-carb_letter.doc)

Original File Name: CARB Letter.doc

Date and Time Comment Was Submitted: 2010-01-26 11:30:16

No Duplicates.

## **Comment 20 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Larry

Last Name: Allen

Email Address: lallen\_apcd@co.slo.ca.us

Affiliation: San Luis Obispo APCD

Subject: Amendments to the Portable Diesel Engine ATCM and PERP

Comment:

The San Luis Obispo County Air Pollution Control District appreciates the opportunity to comment on the proposed amendments to both the Airborne Toxic Control Measure (ATCM) for Diesel Particulate Matter from Portable Engines and the Statewide Portable Equipment Registration Program (PERP). We believe the following concerns need to be addressed to effectively and fairly impose the regulatory requirements on portable diesel engines.

The ATCM Should Not Restrict the Ability to Issue an Air District Permit

The Air Toxic Control Measure should not restrict an Air Pollution Control District from issuing permits to engine owners who would otherwise be in compliance with the emission standards of the regulation; we believe the existing permitting restriction does not belong in the regulation. The latest ARB staff proposal partially acknowledges this concern by allowing for both permitting and registration of certified engines when a permit exemption is lost due to a change in District rules. However, this does not adequately address the situation in many districts.

We have not yet been able to secure permits for all small business owners subject to the regulation in our area, such as concrete pumpers and wood chippers. Despite an extensive state and local outreach effort, many may still not be fully aware of the regulatory requirements or the consequences of failing to comply. There are also unique businesses that use engines for purposes that were not identified and targeted for notification; for instance, just a few months ago we found a 170 hp engine that powered an ice grinder used to make artificial snow for small events like Birthday parties. Additionally, under the current economic climate, some individuals may not have the funds to obtain permits and some have even stopped operation until the economy recovers.

Air districts need the ability to effectively handle situations that do not fit the norm and permit otherwise lawful businesses, some of which may collapse from the cost of purchasing new engines or be forced to continue to operate without permits and remain unregulated.

Engines Not Meeting the Current Certification Standards Should Not Be PERP Eligible

Many air districts have required permits of portable engines for over a decade and would not issue a new permit for an engine unless it met the current tier. The proposed provision to allow engines

into the PERP because they lost a permit exemption from a District that did not previously require permits fosters an uneven regulatory playing field and puts the engine owners already under permit for many years at an economic disadvantage.

We believe the issues identified above can be addressed by incorporating the following revisions to the regulations:

Recommended Changes to the ACTM Proposal

1. Remove proposed section 93116.3(b)(2)(D)
2. Replace 93116.3(b)(2)(D) to allow District-only permitting of discovered Tier 0 engines with the following:  
  
(D) low use engines permitted or registered by a District, where the owner agrees in writing to replace the engine with a certified Tier 4 engine according to the requirements in section 93116.3(b)(1)(B); or
3. Add new section 93116.3(b)(2)(F) to allow any certified engine to be permitted, as follows:  
  
(F) certified engines permitted or registered by a District.

Recommended Changes to the PERP Proposal

1. Modify the resident engine definition to apply to only previously permitted certified engines that were historically allowed into the registration program, as follows:  
  
(mm) "Resident Engine" means a certified engine that at the time of applying for registration, has a current, valid district permit or district registration that was issued prior to January 1, 2006.

The proposed changes recommended above would result in a more equitable and effective regulation while maintaining the emission reductions expected from both the ATCM and from local District permit programs.

We appreciate the opportunity to provide input to this process and look forward to ongoing coordination with your staff to effectively implement these regulations.

Sincerely,

LARRY R. ALLEN  
Air Pollution Control Officer

Attachment: [www.arb.ca.gov/lists/perp2010/24-patcm\\_jan10\\_comments.pdf](http://www.arb.ca.gov/lists/perp2010/24-patcm_jan10_comments.pdf)

Original File Name: PATCM\_Jan10\_comments.pdf

Date and Time Comment Was Submitted: 2010-01-26 14:03:29

No Duplicates.

## **Comment 21 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: J. Michael

Last Name: Mortensson

Email Address: wellguy@sonic.net

Affiliation: California Groundwater Association

Subject: Request approval of proposed amendments inperp2010

Comment:

The California Groundwater Association (CGA) urges approval of the staff proposed amendments regarding 2-engine water well drilling rigs and extension of time for certain Tier 0 engines. Please see attached comment letter.

J. Michael Mortensson  
CGA Executive Director

Attachment: [www.arb.ca.gov/lists/perp2010/25-cga\\_ask\\_carb\\_approval\\_of\\_2010\\_rig\\_rule.pdf](http://www.arb.ca.gov/lists/perp2010/25-cga_ask_carb_approval_of_2010_rig_rule.pdf)

Original File Name: CGA ask CARB approval of 2010 rig rule.pdf

Date and Time Comment Was Submitted: 2010-01-27 09:47:33

No Duplicates.

**Comment 22 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Industry Air Quality Coal.

Subject: CIAQC Comments on Proposed Amendments to Portable Equipment Regulations  
Comment:

CIAQC recommendations for proposed amendments to the PERP and Portable Engine ATCM are attached.

Attachment: [www.arb.ca.gov/lists/perp2010/26-ciaqc\\_-\\_comments\\_on\\_proposed\\_amendments\\_to\\_portable\\_regulations\\_1-26-10.pdf](http://www.arb.ca.gov/lists/perp2010/26-ciaqc_-_comments_on_proposed_amendments_to_portable_regulations_1-26-10.pdf)

Original File Name: CIAQC - Comments on Proposed Amendments to Portable Regulations 1-26-10.pdf

Date and Time Comment Was Submitted: 2010-01-27 10:26:55

No Duplicates.



## **Comment 23 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Anthony  
Last Name: Segarra  
Email Address: info@tanko.com  
Affiliation: CGA

Subject: Water Well Rule  
Comment:

Dear Sir or Madam:

Please give our industry an extension to run our drill rig.

We have been struggling in this tough economy for our third straight year and we really need this extension.

Thank you in advance for your consideration.

Anthony Segarra  
Vice President  
Gary C. Tanko Well Drilling, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-27 11:15:10

No Duplicates.

## **Comment 24 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Steve

Last Name: K.

Email Address: skreinfo@yahoo.com

Affiliation:

Subject: Diesel Debocal

Comment:

Put an expensive modification requirement on diesel owners and put them out of business. Let the citizens of California vote on this crazy notion. Let the people decide if this is good for CA.. Air Resource Board don't force CA. into a worse financial mess than we are already in. The CA. Air Resource Board has too much power and no limitations on them.

Regards,

Steve K.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-27 11:12:03

No Duplicates.

## **Comment 25 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: Adam  
Last Name: Harper  
Email Address: aharper@calcima.org  
Affiliation: CalcIMA

Subject: Comments on Agenda 10-1-2  
Comment:

Attached please find the comments of CalcIMA on the proposed modifications to the PERP regulations.

We would appreciate the Baords consideration of extending the 500 bhp delay to the remaining 10% of fleets not covered under the current proposal. All Companies related to the construction industry have been impacted by the economic downturn and could benefit from this temporary relief.

Adam Harper  
Director of Policy Analysis

Attachment: [www.arb.ca.gov/lists/perp2010/29-perpagenda10-1-2.pdf](http://www.arb.ca.gov/lists/perp2010/29-perpagenda10-1-2.pdf)

Original File Name: PERPagenda10-1-2.pdf

Date and Time Comment Was Submitted: 2010-01-27 11:23:32

No Duplicates.

## **Comment 26 for Portable Diesel Engines (perp2010) - 45 Day.**

First Name: James

Last Name: McNally

Email Address: JMcNally@mansonconstruction.com

Affiliation: Manson Construction

Subject: Marine Engines - Dredging Industry Regulatory Overlap

Comment:

Manson Construction is the largest dredging contractor on the West Coast. Our industry plays a vital role in maintaining shipping lanes, providing coastal protection and restoring coastal habitat up and down the state of California. We also employ many californians with high paying, union craft jobs. Manson has a long history of complying with local district as well as statewide air regulation. We have invested in SCR systems and repowered very large specialized marine equipment with costs in the millions of dollars.

The current changes to the PERP regulation are another example of a patchwork approach to regulation impacting our industry that has had significant detrimental effect on our business and competitive position relative to less informed contractors from out of state. While we don't necessarily disagree with the inclusion of marine engines in the PERP, we wish to point out to the board that there is a significant industry out here employing people and in some cases working hard to comply that finds itself in the very difficult position of having the very same engines included in no less than three regulatory regimes. All of our dredge engines are registered under the PERP, but because we work in state territorial waters, we also are forced into local district permits and often district offsets. In addition, the ARB has proposed to extend the harbor craft rule to dredges. The ATCM applies to use (and we are repowering a 10,000hp vessel at the moment to comply), yet with this change, we should have installed higher emitting marine engines and would have been exempt from the ATCM. We implore the board to direct staff to recognize the overlaps and work with industry to come up with one regulatory regime for dredges. We would be happy to comply and stop wasting money that is ultimately our clients (the taxpayers).

Thank You.

that has had an Unfortunately, we have found ourselves

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-27 11:44:08

No Duplicates.

## **Comment 1 for Portable Diesel Engines (perp2010). (At Hearing)**

First Name: Mary

Last Name: Pitto

Email Address: Non-web submitted comment

Affiliation:

Subject: Regional Council of Rural Counties

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/perp2010/32-mary.pdf](http://www.arb.ca.gov/lists/perp2010/32-mary.pdf)

Original File Name: Mary.pdf

Date and Time Comment Was Submitted: 2010-01-29 15:40:43

No Duplicates.

## **Comment 2 for Portable Diesel Engines (perp2010). (At Hearing)**

First Name: William

Last Name: Davis

Email Address: Non-web submitted comment

Affiliation:

Subject: SCCA

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/perp2010/33-william.pdf](http://www.arb.ca.gov/lists/perp2010/33-william.pdf)

Original File Name: William.pdf

Date and Time Comment Was Submitted: 2010-01-29 15:40:43

No Duplicates.

### **Comment 3 for Portable Diesel Engines (perp2010). (At Hearing)**

First Name: Mike

Last Name: Mortensson

Email Address: Non-web submitted comment

Affiliation:

Subject: California Groundwater Association

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/perp2010/34-mike.pdf](http://www.arb.ca.gov/lists/perp2010/34-mike.pdf)

Original File Name: Mike.pdf

Date and Time Comment Was Submitted: 2010-01-29 15:40:43

No Duplicates.



## **Comment 1 for Portable Diesel Engines (perp2010) - 15-1.**

First Name: carlos

Last Name: castilla

Email Address: affordabletreeandmore@yahoo.com

Affiliation:

Subject: agains this act

Comment:

This act will put me and many others like me out of business, and will end up in government lines. As it is we are struggling with the economy. We need to come in the middle or different gov. incentives.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-16 09:29:13

No Duplicates.

## **Comment 2 for Portable Diesel Engines (perp2010) - 15-1.**

First Name: Laurie

Last Name: McClure

Email Address: lauriemc2@aol.com

Affiliation:

Subject: concrete pumps "portable"

Comment:

To whom it may concern,  
my husband and i own a concrete pumping company we just found out that we need to reg. our concrete pumps both pumps are 2004 plus, i have no problem doing this but the tier 1 and tier 2 are closed my pumps are not OLD yet we may have to put a new engine in them maybe 9,000.00 plus we do not have this kind of money or if the tiers open back up than we would pay around 3,000.00 plus hello you are going to put the little guy out of busness , why cant you grandfater our pumps in that are 2000 or newer we have no problem paying a couple of hundred dollars to have a sticker you are killing the little guy be fair with us the past two years have been ruff for construction. now we cant go to work to pay our bills and feed our kids due to someone showing up on the jobs to give us a fine.we will be on welfair that the state will be paying. PLEASE THINK ABOUT WHAT YOU ARE DOING ,LAURIE

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-23 17:40:16

No Duplicates.

### **Comment 3 for Portable Diesel Engines (perp2010) - 15-1.**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Ind. Air Quality Coalition

Subject: CIAQC comments on 15-Day Proposed Changes to Portable Equipment Regulations  
Comment:

Attached are CIAQC's comments on the 15-Day Proposed Changes to Portable Equipment Regulations including the Portable Equipment Registration Program (PERP).

Attachment: [www.arb.ca.gov/lists/perp2010/38-perp\\_-\\_ciaqc\\_comments\\_on\\_15-day\\_changes\\_for\\_3-30-10.pdf](http://www.arb.ca.gov/lists/perp2010/38-perp_-_ciaqc_comments_on_15-day_changes_for_3-30-10.pdf)

Original File Name: PERP - CIAQC Comments on 15-Day Changes for 3-30-10.pdf

Date and Time Comment Was Submitted: 2010-03-25 14:18:41

No Duplicates.

## **Comment 4 for Portable Diesel Engines (perp2010) - 15-1.**

First Name: Stan

Last Name: Kenyon

Email Address: stansteam9@aol.com

Affiliation:

Subject: Comment to Proposed Regulations to Portable Diesel Engines

Comment:

Please see attached letter to California Air Resources Board

Attachment: [www.arb.ca.gov/lists/perp2010/39-carb\\_comments.pdf](http://www.arb.ca.gov/lists/perp2010/39-carb_comments.pdf)

Original File Name: CARB Comments.pdf

Date and Time Comment Was Submitted: 2010-03-30 15:31:41

No Duplicates.

## **Comment 5 for Portable Diesel Engines (perp2010) - 15-1.**

First Name: Janet

Last Name: Bell

Email Address: jbell@mwdh2o.com

Affiliation:

Subject: Comments on 15-Day Proposed Changes to Statewide PERP

Comment:

Attention: Clerk of the Board, California Air Resources Board

Dear Ms. Blakeslee:

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments in response to the California Air Resources Board (ARB) 15-day proposed modifications for the Statewide Portable Equipment Registration Program (PERP). Metropolitan supports several of the changes that the California Air Resources Board (CARB) is proposing to make to the PERP to help provide regulatory relief to portable equipment owners, especially in light of the economic situation in California. To facilitate this goal, Metropolitan is providing the following comments.

### Recordkeeping and Reporting

Under the current regulation, a Provider of Essential Public Service (PEPS) is required to submit for both certified and non-certified engines, an annual report containing among other information, the estimated time spent in the three counties where the engine operated most frequently. However, the proposed amendments would expand the information required to be kept for both non-certified engines and equipment to include the street address, the city, county and UTM coordinates, or other location indicator, each time the engine or equipment unit is brought to a new location. Requiring this information is contrary to the efforts to streamline the regulations and decrease the regulatory burden on portable equipment owners, and does not appear to provide any commensurate benefit to the purpose of the regulation. Therefore, Metropolitan recommends that the recordkeeping and reporting requirements for PEPS remain unchanged.

### Application Process - Electronic Notification of Registration

Metropolitan appreciates the proposed provision for adding the option for electronic notification to the applicant when an engine or equipment unit has been registered in Section 2453 Application Process. However, there may be a lag time from the time of electronic notification to an applicant's receipt in the mail of the registration identification device that is affixed on each engine or piece of equipment. To address this timing issue, we recommend that language be included in the regulation to allow the equipment to be operated once the electronic notification is received, as long as the registration is maintained with the equipment, and the operating and recordkeeping conditions are

implemented.

If you have any questions, please contact Janet Bell at (213) 217-5516 (jbell@mwdh2o.com).

Sincerely,

Janet Bell  
EHS Program Manager  
Metropolitan Water District of Southern California  
700 North Alameda Street  
Los Angeles, California 90012  
(213) 217-5516

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-30 16:38:42

No Duplicates.

## **Comment 1 for Portable Diesel Engines (perp2010) - 15-2.**

First Name: Daniel

Last Name: Kruger

Email Address: dkruger@soperwheeler.com

Affiliation:

Subject: Portable Diesel Rule must parallel Off-Road Rules

Comment:

For consistency, clarity in reporting and enforcement, and to aid economic recovery, it is imperative that the Portable Rule be reopened and adjusted to be consistent with the OFF-ROAD diesel engine emission rule and its proposed modifications.

The Off-Road Rule proposes delaying performance requirements by 4 years for large fleets and 2 years for medium and small fleets. To be consistent with the Off-Road Rule, The Portable Rule must do the same, and must include the same exemptions for Agricultural/Forestry equipment.

Doing so will standardize and streamline both the reporting and enforcement burdens the State has to bear in its implementation, and create clear standards across categories to diesel equipment owners.

As currently written, the December 31, 2010 deadline for taking pre-1996 Portable diesel engine equipment out of service will be devastating to agriculture, forestry, and construction contractors struggling to support working families through ongoing tough times.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-11-17 13:00:35

No Duplicates.

## **Comment 2 for Portable Diesel Engines (perp2010) - 15-2.**

First Name: Michael

Last Name: Albrecht

Email Address: mikealbrecht@mlode.com

Affiliation: small business owner

Subject: Portable Diesel Engine Rules

Comment:

To whom it may concern: unless ammended, the current PDE rules will put our small timber harvesting business out off business. We own a 1994 Morbark whole tree chipper that we spent \$30,000 on last year rebuilding the engine. We thin 500-1,000 acres of forestland each year with this machine converting forest fire fuel to biomass energy. We do not have the \$400,00 to replace this machine or the \$80,000 to repower it. Our company is lucky to still exist coming off the two worst years financially we've seen since our incorporation in 1993. If we have to idle this machine, it will idle our business and its 13 employees. I speak for many in our industry that need a couple of good years before we can consider buying a new machine. This rule in its current form will work against our economy and our environment by shutting down operations that are greatly reducing the risk of catastrophic fire ("the dollar") in the name of cleaning our air of the emissions of single engines ("the dime"). Please give us some more time to heal....Thank you for your consideration, Mike Albrecht, President, Sierra Resouce Management. Sonora, Calif.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-11-23 14:50:04

No Duplicates.



### **Comment 3 for Portable Diesel Engines (perp2010) - 15-2.**

First Name: Carol

Last Name: Kaufman

Email Address: cykaufman@mwdh2o.com

Affiliation: Metropolitan Water District of So Cal

Subject: MWD Comments-2nd 15-Day Change Notice for the PERP Regulation and the Portable Engine ATCM

Comment:

Thank you for the opportunity to comment on the Second 15-Day Change Notices for the Modified Regulation Orders for both the PERP Regulation and the Portable Engine ATCM, posted November 10, 2010. As an affected organization, Metropolitan Water District of Southern California (Metropolitan) supports several of the changes that the California Air Resources Board (ARB) is proposing that will help provide regulatory relief to portable equipment owners. To facilitate this goal, Metropolitan is submitting the attached comments.

Attachment: [www.arb.ca.gov/lists/perp2010/43-11-24-10\\_mwd\\_comments\\_2nd\\_day\\_notice\\_perp-atcm.doc](http://www.arb.ca.gov/lists/perp2010/43-11-24-10_mwd_comments_2nd_day_notice_perp-atcm.doc)

Original File Name: 11-24-10 MWD Comments 2nd Day Notice PERP-ATCM.doc

Date and Time Comment Was Submitted: 2010-11-24 08:45:51

No Duplicates.

## **Comment 4 for Portable Diesel Engines (perp2010) - 15-2.**

First Name: Michael  
Last Name: Graboski  
Email Address: msgraboski@speedtrail.net  
Affiliation: American Rental Association

Subject: Comment re PERP2010  
Comment:

ARA Comment November 24, 2010

Attachment: [www.arb.ca.gov/lists/perp2010/44-comment\\_on\\_modified\\_regulation\\_order\\_for\\_the\\_perp\\_regulation.docx](http://www.arb.ca.gov/lists/perp2010/44-comment_on_modified_regulation_order_for_the_perp_regulation.docx)

Original File Name: Comment on Modified Regulation Order for the PERP Regulation.docx

Date and Time Comment Was Submitted: 2010-11-24 11:43:41

No Duplicates.

**Comment 5 for Portable Diesel Engines (perp2010) - 15-2.**

First Name: Mary

Last Name: Pitto

Email Address: mpitto@rcrcnet.org

Affiliation: Regional Council of Rural Counties

Subject: 15 day notice for Portable Equipment Regulations

Comment:

Attached please find comments from RCRC on the 15 day notice for the portable equipment regulations.

Attachment: [www.arb.ca.gov/lists/perp2010/45-112410.ltr.arb.doc](http://www.arb.ca.gov/lists/perp2010/45-112410.ltr.arb.doc)

Original File Name: 112410.ltr.arb.doc

Date and Time Comment Was Submitted: 2010-11-24 15:12:24

2 Duplicates.

## **Comment 6 for Portable Diesel Engines (perp2010) - 15-2.**

First Name: Karl

Last Name: Lany

Email Address: klany@scec.com

Affiliation:

Subject: Proposed 15-day amendment to PERP and ATCM

Comment:

Please see the attached letter reflecting comments on proposed regulatory amendments submitted on behalf of the California Caterpillar Dealers.

Attachment: [www.arb.ca.gov/lists/perp2010/48-caterpillar\\_perp\\_comments.pdf](http://www.arb.ca.gov/lists/perp2010/48-caterpillar_perp_comments.pdf)

Original File Name: caterpillar perp comments.pdf

Date and Time Comment Was Submitted: 2010-11-24 16:05:49

No Duplicates.

## **Comment 7 for Portable Diesel Engines (perp2010) - 15-2.**

First Name: Megan

Last Name: Lum

Email Address: gcmc@pge.com

Affiliation:

Subject: Comment Letter; Second 15-Day Notice of Modifications to the PERP Regulation  
Comment:

See attached comment letter.

(Submitted by Gary Ma on behalf of Megan Lum)

Attachment: [www.arb.ca.gov/lists/perp2010/49-pge\\_perp\\_amendments\\_comment\\_letter\\_20101124.pdf](http://www.arb.ca.gov/lists/perp2010/49-pge_perp_amendments_comment_letter_20101124.pdf)

Original File Name: PGE\_PERP\_Amendments\_Comment\_Letter\_20101124.pdf

Date and Time Comment Was Submitted: 2010-11-24 18:43:39

No Duplicates.