

Comment 1 for Emergency Regulation (statemg06) - Emergency.

First Name: Stanley

Last Name: Alger

Email Address: stana@peninsulacrane.com

Affiliation: Peninsula Crane & Rigging

Subject: Comment on draft concepts of emergency amendment to PERP

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/2-statemg06-2.pdf'

Original File Name: statemg06-2.pdf

Date and Time Comment Was Submitted: 2006-11-28 11:30:26

No Duplicates.

Comment 2 for Emergency Regulation (statemg06) - Emergency.

First Name: Michael

Last Name: Vlaming

Email Address: mjv@craneowners.org

Affiliation: Crane Owners Association

Subject: Emergency Amendment to Statewide PERP Regulation

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/3-statemg06-3.pdf>'

Original File Name: statemg06-3.pdf

Date and Time Comment Was Submitted: 2006-11-28 11:32:09

No Duplicates.

Comment 3 for Emergency Regulation (statemg06) - Emergency.

First Name: Kimberly

Last Name: Nemmers

Email Address: knemmers@ur.com

Affiliation: United Rentals, Inc.

Subject: Comments on Draft PERP Comments from Emergency Meeting

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/4-statemg06-4.pdf'

Original File Name: statemg06-4.pdf

Date and Time Comment Was Submitted: 2006-11-28 11:33:57

No Duplicates.

Comment 4 for Emergency Regulation (statemg06) - Emergency.

First Name: Jim

Last Name: Bury

Email Address: buryj@putzam.com

Affiliation: Putzmeister America, Inc.

Subject: Thoughts on PERP

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/5-statemg06-1.pdf'

Original File Name: statemg06-1.pdf

Date and Time Comment Was Submitted: 2006-11-28 11:43:06

No Duplicates.

Comment 5 for Emergency Regulation (statemg06) - Emergency.

First Name: Trina

Last Name: Panaqua

Email Address: Non-web submitted comment

Affiliation: Garvey Equipment Company

Subject: Confidential Comment for Amendments to the Statewide PERP Regulation
Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/6-statemg06-5.pdf'

Original File Name: statemg06-5.pdf

Date and Time Comment Was Submitted: 2006-11-28 14:52:57

No Duplicates.

Comment 6 for Emergency Regulation (statemg06) - Emergency.

First Name: Mike

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Industry Air Quality Coalit

Subject: CARB PERP Program amendments

Comment:

see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/7-statemg06-6.eml'

Original File Name: statemg06-6.eml

Date and Time Comment Was Submitted: 2006-11-29 12:08:41

No Duplicates.

Comment 7 for Emergency Regulation (statemg06) - Emergency.

First Name: Pat

Last Name: Resendez

Email Address: psresendez@sbcglobal.net

Affiliation: Slinsen Construction Company

Subject: P.E.R.P.

Comment:

see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/8-statemg06-7.eml'

Original File Name: statemg06-7.eml

Date and Time Comment Was Submitted: 2006-11-29 12:14:17

No Duplicates.

Comment 8 for Emergency Regulation (statemg06) - Emergency.

First Name: Jose
Last Name: Escobedo
Email Address: jose@brosamer.com
Affiliation: R&L Brosamer, Inc.

Subject: RE Open PERP RLB - MESSAGE ARCHIVED
Comment:

see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/9-statemg06-8.eml'

Original File Name: statemg06-8.eml

Date and Time Comment Was Submitted: 2006-11-29 12:17:31

No Duplicates.

Comment 9 for Emergency Regulation (statemg06) - Emergency.

First Name: J. Kevin

Last Name: Pedrotti

Email Address: kevin@jkpedrotti.com

Affiliation: JK Pedrotti Government Relations

Subject: Comment on Amendments to the Statewide PERP Reg.and the ATCM for Diesel-Fueled Portable...

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/10-statemg06-9.pdf'

Original File Name: statemg06-9.pdf

Date and Time Comment Was Submitted: 2006-11-30 15:58:17

No Duplicates.

Comment 10 for Emergency Regulation (statemg06) - 45 Day.

First Name: Allan G.

Last Name: Daly

Email Address: adaly@sierraresearch.com

Affiliation: Sierra Research

Subject: Crane Owners Comments on Emergency PERP Ammendments

Comment:

see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/11-comments_to_the_proposed_emergency_perp.txt'

Original File Name: Comments to the Proposed Emergency PERP.txt

Date and Time Comment Was Submitted: 2006-12-01 14:25:46

No Duplicates.

Comment 11 for Emergency Regulation (statemg06) - Emergency.

First Name: Richard
Last Name: Wales
Email Address: rwales@mdaqmd.ca.gov
Affiliation: Mojave Desert AQMD

Subject: Public Comments of PERP Emergency Amendments
Comment:

December 5, 2006

Clerk of the Board
California Air Resources Board
1001 I Street, 23rd Floor
Sacramento, California 95814

Subject: Comments Regarding the Proposed Emergency Amendments to the Statewide Portable Equipment Registration Program (PERP) Regulation and the Airborne Toxic Control Measure (ATCM) for Diesel-Fueled Portable Engines and the ATCM for Compression-Ignition Engines

Dear Clerk of the Board:

The Mojave Desert Air Quality Management District (MDAQMD) wants to acknowledge your staff for the preparation of the "Draft Concepts for emergency amendments to PERP and the ATCMs for Portable and Stationary Diesel Engines". The MDAQMD wishes to provide the following comments:

1. The 'Draft Concepts' look fair but detailed comments cannot be made without a thorough review the actual language changes that will be made to the PERP and the 2 ATCMs.

2. The MDAQMD has recently received a number of inquiries from small business that have a single portable engine subject to this ATCM. These small operators have only recently become aware (within the last week or so) about these Emergency Amendments. The universally expressed concerns that 'late penalties' could bankrupt their business. Therefore the MDAQMD recommends that 'late penalties' be restructured for a small business. The late penalties could be \$100 for calendar year 2007 and then raising to \$200, and then \$400 for year 2008 and 2009. A good definition for a small business is the one used in the Air Toxics "Hot Spots" Fee Program (AB2588), as follows:

A) The business is independently owned and operated and has met all of the following

i) The business has 10 or fewer (annual full-time equivalence) employees; and

ii) The business's total annual gross receipts are less than

\$1,000,000.

The MDAQMD thanks the Board for giving us this opportunity to comment of these proposed emergency amendments. Should you have any questions, please contact Mr. Richard Wales of the my staff at (760) 245-1661 extension 1803.

Sincerely,

Alan J. De Salvio
Supervising Air Quality Engineer
Mojave Desert Air Quality Management District

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/12-perp-md.pdf>'

Original File Name: PERP-MD.PDF

Date and Time Comment Was Submitted: 2006-12-05 13:16:35

No Duplicates.

Comment 12 for Emergency Regulation (statemg06) - Emergency.

First Name: Richard

Last Name: Wales

Email Address: rwales@mdaqmd.ca.gov

Affiliation: Antelope Valley AQMD

Subject: Public Comments of PERP Emergency Amendments

Comment:

December 5, 2006

Clerk of the Board
California Air Resources Board
1001 I Street, 23rd Floor
Sacramento, California 95814

Subject: Comments Regarding the Proposed Emergency Amendments to the Statewide Portable Equipment Registration Program (PERP) Regulation and the Airborne Toxic Control Measure (ATCM) for Diesel-Fueled Portable Engines and the ATCM for Compression-Ignition Engines

Dear Clerk of the Board:

The Antelope Valley Air Quality Management District (AVAQMD) wants to acknowledge your staff for the preparation of the "Draft Concepts for emergency amendments to PERP and the ATCMs for Portable and Stationary Diesel Engines". The AVAQMD wishes to provide the following comments:

1. The 'Draft Concepts' look fair but detailed comments cannot be made without a thorough review the actual language changes that will be made to the PERP and the 2 ATCMs.

2. The AVAQMD has recently received a number of inquiries from small business that have a single portable engine subject to this ATCM. These small operators have only recently become aware (within the last week or so) about these Emergency Amendments. The universally expressed concerns that 'late penalties' could bankrupt their business. Many of these small businesses provide support to the agriculture and construction industries. Therefore the AVAQMD recommends that 'late penalties' be restructured for a small business. The late penalties could be \$100 for calendar year 2007 and then raising to \$200, and then \$400 for year 2008 and 2009. A good definition for a small business is the one used in the Air Toxics "Hot Spots" Fee Program (AB2588), as follows:

A) The business is independently owned and operated and has met all of the following

i) The business has 10 or fewer (annual full-time equivalence) employees; and

ii) The business's total annual gross receipts are less than \$1,000,000.

The AVAQMD also thanks the Board for giving us this opportunity to comment of these proposed emergency amendments. Should you have any questions, please contact Mr. Richard Wales of the my staff at (760) 245-1661 extension 1803.

Sincerely,

Alan J. De Salvio
Supervising Air Quality Engineer
Antelope Valley Air Quality Management District

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/13-perp-av.pdf>'

Original File Name: PERP-AV.PDF

Date and Time Comment Was Submitted: 2006-12-05 13:18:29

No Duplicates.

Comment 13 for Emergency Regulation (statemg06) - Emergency.

First Name: Larry

Last Name: Rubenstein

Email Address: adaly@sierraresearch.com

Affiliation: Sierra Research

Subject: Crane Owners Comments on the Emergency Amendments to the PERP & Portable Diesel ATCM

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/15-statemg06-13.pdf>'

Original File Name: statemg06-13.pdf

Date and Time Comment Was Submitted: 2006-12-05 13:52:17

No Duplicates.

Comment 14 for Emergency Regulation (statemg06) - Emergency.

First Name: John

Last Name: McClelland

Email Address: john.mcclelland@ararental.org

Affiliation: American Rental Association

Subject: PERP Emergency Regulation Comments

Comment:

These are the official comments of the American Rental Association.

I would like to request the opportunity to address the Board at the December 7, 2006 meeting. I appreciate your consideration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/17-carb-perp-comment-amnesty-issue-dec_2006.pdf'

Original File Name: CARB-PERP-COMMENT-amnesty-issue-Dec 2006.pdf

Date and Time Comment Was Submitted: 2006-12-05 14:25:23

No Duplicates.

Comment 15 for Emergency Regulation (statemg06) - Emergency.

First Name: Jeff

Last Name: Geraci

Email Address: jpgeraci@yahoo.com

Affiliation:

Subject: Pre-Tier Engines Currently Registered in Local Air District

Comment:

Request for consideration of "Grandfather" PERP qualification for pre-tier compression engines that are currently registered with a Local California Air District.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 09:54:47

No Duplicates.

Comment 16 for Emergency Regulation (statemg06) - Emergency.

First Name: Michael

Last Name: Cusack

Email Address: mcusack@concoement.com

Affiliation: American Concrete Pumping Association

Subject: Re open PERP

Comment:

I feel that it would only be fair to open the PERP registration to all tier engine for the 2007 year. Then close off tier 0 at that time. I believed that the idea of registration was to identify where and how many engines were tier 0. By not allowing them in the program the ARB will never know where or how many are out in the state.

I don't understand how you can charge current fees with penalties for past due fees. They should be what the fees were and then add on the penalty.

I think an outreach program should be address in the reopening.

Mike Cusack

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 10:40:28

No Duplicates.

Comment 17 for Emergency Regulation (statemg06) - Emergency.

First Name: James

Last Name: Bury

Email Address: buryj@putzam.com

Affiliation: Putzmeister America

Subject: comments on "Draft Concepts"

Comment:

Dear Dr. Sawyer and ARB Board,

Thank you for your recent efforts and considerations in the emergency measures being taken in the PERP program. In conjunction with the Staff, your openness to cooperation with those who wish to comply but missed the call to register is welcomed and applauded by Putzmeister and its customers.

Unfortunately, I do not feel the spirit and intent of your directive has been completely embraced by the proposal that the Staff has presented for your consideration on December 7th. I am unable to attend the ARB meeting due to a previously-scheduled Canadian government regulatory meeting, so I am writing to you today as a communication of where we feel the proposal continues to fall short of what is needed.

1) In the first point of the new "Draft Concepts", there continues to be no provision for the sale and registration of any new Tier II equipment into California between October 1, 2006 and the time that these proposals are approved and become effective. This equipment is considered appropriate from an emissions standpoint, so why would it not be permitted from a registration standpoint? I understand the Staff's intent of limiting the registration to "resident" machines to stop a flood of non-CA equipment, but this totally cuts off new equipment simply because it does not have a California history. This was brought up at the November 20th meeting, but apparently was not considered important or was ignored.

2) In the fees schedule, it is still unclear where the Staff is getting their numbers from. Unless I am mistaken, up until relatively recent times, the registration was \$30 and the inspections were \$75. Even if Staff believes the registrants should pay for an inspection that never occurred, I do not see how they are justifying a increase from year-over-year as proposed. In the meeting, can we please get this breakdown from Staff so we can finally understand the rational? The fees continue to seem outrageously high.

3) We do not understand why the fifth point exists. Why does Staff not allow Tier 1 engine owners show proof of purchase date? By separating Tier 1 and Tier 2 (point #6), you set up a situation like the following: resident buys a 1998 Tier 1 unit second hand in 2005. By Staff's proposal, they do not pay fees for 2005 but must go all the way back to 1998. It is recommended that point 5 be eliminated and point 6 includes both Tier 1 and Tier 2.

4) In point #7, Staff is phasing out all Tier 1 and Tier 2 engines from PERP. Why? They are still usable machines and the owner should still be able to use them in their fleet averaging. By emission regulation, only non-tiered machines (Tier 0) are mandated to be eliminated for emission reasons by the EPA. Even those who have faithfully registered their Tier 1 engines over the last 8 -10 years should disagree with this change. The simple solution to this would be to remove the word "current" from the Staff's proposal.

5) We continue to feel the exclusion of the non-tiered machines into PERP is a mistake and seems to be considered a non-negotiable absolute by Staff. They continue to believe that these machines should be forced to register with every district that they operate in. This is obviously not in-line with the original intent of creating a statewide program to simplify registrations and assumes that the districts will allow a Tier 0 into their program. This is a very sizable population of machines that Staff is forcing into California oblivion three years before the US EPA mandates their extinction.

Putzmeister does not see how this latest proposal by Staff, though well-intentioned as it may be, resolves the issues discussed in the November 20th meeting and actually adds in a couple of additional controversial issues. We do not intend to further delay the opening up of the registration program to those who sincerely want to join, but it would be very helpful if these issues were corrected and integrated as requested by the large number of attendees on November 20th. Please consider looking into this at the December 7th meeting.

Sincerely

James Bury
Engineering Manager
Putzmeister America

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-12-06 13:05:26

No Duplicates.

Comment 1 for Emergency Regulation (statemg06). (At Hearing)

First Name: Lance

Last Name: Erickson

Email Address: Non-web submitted comment

Affiliation: Monterey Bay United APCD

Subject: Emergency Amendment to Statewide PERP Regulation

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/22-statemg06-ws-1.pdf>

Original File Name: statemg06-ws-1.pdf

Date and Time Comment Was Submitted: 2006-12-12 14:01:05

No Duplicates.

Comment 2 for Emergency Regulation (statemg06). (At Hearing)

First Name: William

Last Name: Davis

Email Address: Non-web submitted comment

Affiliation: Mobile Crane Operators Group

Subject: Emergency Amendment to Statewide PERP Regulation

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/23-statemg06-ws-2.pdf>

Original File Name: statemg06-ws-2.pdf

Date and Time Comment Was Submitted: 2006-12-12 14:07:14

No Duplicates.

Comment 3 for Emergency Regulation (statemg06). (At Hearing)

First Name: Trina

Last Name: Panqua

Email Address: Non-web submitted comment

Affiliation: Garvey Equipment Company

Subject: Emergency Amendment to Statewide PERP Regulation

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/statemg06/24-statemg06-ws-3.pdf>

Original File Name: statemg06-ws-3.pdf

Date and Time Comment Was Submitted: 2006-12-12 14:12:14

No Duplicates.