

**From:** [Ma, Gary](#)  
**To:** [ARB Clerk of the Board](#)  
**Cc:** [Ma, Gary](#)  
**Subject:** Comments on Board Item ctr2018: LLNL Comments on Modified Text for the CTR Regulation  
**Date:** Friday, June 7, 2019 2:28:19 PM

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Due to the docket system experiencing technical issues, I am emailing comments directly to the Clerk of the Board.

First Name: Gary  
Last Name: Ma  
Email Address: [ma36@llnl.gov](mailto:ma36@llnl.gov)  
Phone: 925-422-0878  
Affiliation: Lawrence Livermore National Laboratory

Subject: LLNL Comments on Modified Text for the CTR Regulation

Lawrence Livermore National Laboratory (LLNL) appreciates the opportunity to review and comment on the modified text of the Regulation for Reporting of Criteria Air Pollutants and Toxic Air Contaminants (or CTR Regulation) which was made available to the public on May 13, 2019.

Section 93404(b)(2)(C) is new regulatory language added to capture the reporting of emissions from portable engines or devices. §93404(b)(2)(C) is hard to understand and interpret, but appears to require facilities to report emissions from portable engines/equipment used at the facility regardless of engine/equipment ownership – with the exception of portable engines/equipment registered into the Statewide Portable Equipment Registration Program (PERP) used for less than 3 months at the facility. This new language would mean facilities would potentially be required to report emissions from portable engines/equipment brought on-site by contractors.

In general, LLNL requests CARB staff to review the intent of §93404(b)(2)(C) and clarify the language for better understanding. LLNL believes that requiring facilities to report emissions from contractor-owned equipment would be difficult to comply with and a duplication of reporting already required of the contractor. In addition, LLNL is particularly concerned with how §93404(b)(2)(C) would require facilities to report emissions from contractor-owned portable engines (such as those driving air compressors and generators) rated under 50 brake-horsepower (bhp) – as the section does not seem to suggest a reporting threshold based on horsepower rating. Contractors typically do not obtain PERP registration for portable engines rated under 50 bhp. This is because most local air districts exempt engines under 50 bhp from permitting requirements, thus contractors can typically operate portable engines under 50 bhp without a local air district permit or CARB PERP registration. Therefore, as an example, §93404(b)(2)(C) would require a facility to report emissions from a contractor-owned non-PERP registered 45 bhp portable air compressor used for one day at the facility, but a contractor-owned PERP registered 51 bhp portable air compressor used for 80 days at the facility would be exempt from reporting.

To simplify the language of §93404(b)(2)(C), LLNL suggests the section be modified to require that facilities report emissions from all facility-owned portable engines or devices, regardless of their bhp rating or permit status. Emissions from portable engines or devices used at the facility but owned by any other party (e.g. contractor, rental company) would not be required to be reported.

LLNL appreciates your consideration of these comments. Please do not hesitate to contact me should you have any questions regarding these comments.

Sincerely,

Gary Ma  
Environmental Analyst – Air  
Lawrence Livermore National Laboratory  
925.422.0878 | [ma36@llnl.gov](mailto:ma36@llnl.gov)