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*In reply, please refer to: ENV1106/194*

November 14, 2006

Peggy Taricco  
Chief, Emission Inventory Branch  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Proposed changes to draft AB 2588 Emission Inventory Criteria and Guidelines Regulation.**

Dear Ms. Taricco:

Lockheed Martin Aeronautics Company – Palmdale welcomes the opportunity to provide comments on the proposed amendments to the AB2588 Emission Inventory Criteria and Guidelines Regulation. Our facilities have stationary and portable emergency use diesel engines. We will be directly impacted by the inclusion of these engine’s emissions into the AB 2588 program.

It is in the interest as responsible operators, and in the interest of the communities in which we operate, to ensure that any further actions taken pursuant to AB 2588 are based on accurate estimates of the incremental risk associated with emergency diesel engine used at our facilities. We believe there should be a 26 hour per year exemption for testing diesel engines used for emergency fire protection systems. Providing such an exemption would be consistent with the existing exemption listed in the Airborne Toxic Control Measure for Stationary Compressed Ignition Engines (ATCM).

Fire pumps are required to be tested at least 30 minutes per week, pursuant to Sections 8.3.1 and 8.3.1.3 of the National Fire Protection Association (NFPA) 25 – “*Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*”.

Lockheed Martin Aeronautics Company - Palmdale appreciates the California Air Resources Board’s consideration of the above noted proposed change to the draft AB 2588 Guidelines regulation.



If you have any questions, please contact me at (661) 572-4327.

Sincerely,

George Jung  
Air Quality Compliance Specialist

cc: Robert Fletcher – CARB  
Linda Murchison - CARB  
Chris Halm – CARB  
Dale Shimp - CARB