



Air Pollution Control Board

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COMMENTS ON THE PROPOSED CHANGES TO THE AIRBORNE TOXIC CONTROL MEASURE FOR DIESEL PARTICULATE MATTER FROM PORTABLE ENGINES RATED AT 50 HORSEPOWER AND GREATER AND THE REGULATION TO ESTABLISH A STATEWIDE PORTABLE EQUIPMENT REGISTRATION PROGRAM

The San Diego County Air Pollution Control District (District) appreciates the opportunity to comment on the proposed Airborne Toxic Control Measure (ATCM) for Diesel Particulate Matter from Portable Engines Rates at 50 Horsepower and Greater (Portable Diesel Engine ATCM) and the Regulation to Establish a Statewide Portable Equipment Registration Program (PERP). These regulations provide important environmental benefits by controlling emissions of carcinogenic diesel particulate matter and reducing emissions of nitrogen oxides. The District supports the rules and the work Air Resources Board staff has done to amend these regulations. The District is providing the following comments to help improve the proposed regulations:

Definition of Crane

Both the proposed modification to the Portable Diesel Engine ATCM and PERP define "Crane" as "means the same as "Two-Engine Cranes" defined in Title 13, CCR, section 2449(c)(56)". In San Diego County there are a number of single engine cranes that move along a fixed track and are located at ship yards. These crane engines are currently regulated under the Portable Diesel Engine ATCM. The District requests a definition be added for portable single engine cranes and clarification added to the applicability section that non-vehicular portable single engine cranes will remain subject to the Portable Diesel Engine ATCM and PERP requirements.

The District also requests that the current proposed definition for "Crane" be changed to "Two-Engine Crane" and defined in the Portable Diesel Engine ATCM and PERP rather than referencing Title 13, CCR, section 2449(c)(56). It is clearer for the affected industry to read and understand the regulation without having to refer to a separate section of the Health and Safety Code.

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Other Two-Engine Vehicles

The proposed modifications to the Portable Diesel Engine ATCM acknowledges the existence of two engine cranes and street sweepers and the necessity for both the propulsion engine and auxiliary engine to be regulated under the same State ATCM. There are many other types of vehicles that also have two engines, one for propulsion and one for auxiliary use; examples include jet-vac trucks, air-vacuum excavation systems, vacuum trucks, cold planers and milling machines, street strippers, drill rigs, manlifts, and hay balers. What State ATCM are both the engines associated with these vehicles subject to?

If you have any questions concerning these comments, please contact me at (858) 586-2640 or Cara Bandera at (858) 586-2751.



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