



## **IMPORTANT INFORMATION RELATED TO THE PROPOSED AMENDMENTS TO THE PORTABLE EQUIPMENT REGISTRATION PROGRAM (PERP)**

The proposed changes to the Portable Diesel Engine Airborne Toxic Control Measure (ATCM) will require changes to the PERP to keep them meshed together. In addition, California Air Resources Board (CARB) proposes to increase fees and change how PERP applications are processed. These changes are anticipated to be adopted by the CARB Governing Board at the March 2017 meeting.

The proposed changes to the PERP regulation include language that makes agricultural engines not eligible for the PERP registration, since they are considered part of a stationary source, unless it is owned by a rental business. Engines meeting residency requirements, like having current district permits, will be eligible for registration if the fleet is large and will use the fleet average option of the ATCM. Also, PERP will keep auxiliary engines on 2-engine vehicles eligible as long as they meet the requirements of Off-road Diesel Regulation.

CARB is proposing changes to how applications to register equipment are processed. Issuance of PERP registrations will be limited to 90 days from date application deemed complete and denials will be kept at 90 days from the date of receipt. A temporary registration for Tier 4 final engines will be issued immediately upon submittal of an application. The temporary registration will expire in 3 months, by which time the official registration should be approved or denied.

The amendments may also give air pollution control districts more approval power over equipment operated under a PERP registration within their district. In instances when a registered generator provides temporary power for a broken down stationary backup generator the district, given 72 hours prior notice, can approve up to 180 days of operation. District permitting requirements will take over after the 180 days. The replacement engine must have the same or cleaner emissions and must comply with the existing stationary permit. Language is also being considered that would give non-attainment districts the ability to review impacts on Ambient Air Quality Standards of registered equipment operated at large projects. This could seriously impact construction projects which theoretically should have already undergone a CEQA review including an air quality impact analysis.

The time frame for electrical upgrade operations will be expanded from 60 to 180 days.

There will be a revision to the definition of Provider of Essential Public Services (PEPS) adding specific categories since the current definition is overly broad.

The current multiple engine inspection discount for gathering more than 3 engines for an inspection is not always working, so proposed changes give districts the ability to send a bill for the difference in the inspection fees. Fleets that misuse the discount will be prevented from using it in the future.

Rental agreements for equipment units and engines will not need to be kept onsite, but should be readily available. The notification requirement for a greater than 9 month rental will be removed.

A change to how program fees are submitted is currently being examined due to incomplete applications causing delays in registration issuance. Applicants may soon be invoiced for registrations after submittal



and review. A program fee increase is expected to occur to cover the “rising cost” of program implementation, which will be about an overall 25% increase for applications. A minimum of 15% increase in the inspections fees and as much as a 40% increase in ARB fees combine for the 25% increase that may occur. In addition, a submission of hour meter readings on all engines at time of renewal is being considered to support CARB’s emissions models.

For an identical engine replacement, the owner or operator of the portable engine or equipment unit will have 30 calendar days instead of 5 calendar days to submit a notification to the Executive Office in writing. This only affects non-registered engines (the replacement engine would not yet have a registration) and will be limited to engines compliant with the phase-out schedule.

Applications for change of ownership for lower tier engines within 6 months prior to small fleet phase out will be denied. CARB is proposing this to prevent the movement of older engines between fleets. Applications will not be approved after the dates listed in the table below:

Engine Certification	Engines rated 50 to 750 bhp	Engines rated >750 bhp
Tier 1	7/1/2019	7/1/2021
Tier 2	7/1/2024	7/1/2026
Tier 3 built prior to 1/1/2009*	7/1/2027	NA
Tier 3 built on or after 1/1/2009	7/1/2029	NA

The application to designate Tier 3 engines as low-use or emergency-use must be submitted in January and must align with the annual report for hour meter readings. The removal of obsolete Tier 0 engine language will be made by the proposed amendment. This is because there will be no more Tier 0 starting in 2017.

Currently, an annual report must be submitted by the districts to CARB summarizing enforcement activities and a registration number must be specified for each inspection performed. CARB is proposing to remove this language since the reports are not being reviewed anyway.

There is a concern that engines with diesel particulate filters (DPFs) may not work well in some applications, therefore the ARB will be investigating those technical issues. If these issues are not resolved, there might be some flexibility add to the ATCM.

CARB is also considering adding a labeling requirement so the emission tier of an engine is readily identifiable in the field by district enforcement officers. Different methods for field identification and enforcement have been considered such as different placards and colors.

The Board hearing where these changes will be considered is anticipated to be in March 2017. A public workshop will be held in Sacramento on 11/10/16. Please see the portable listserv for available for updates: [www.arb.ca.gov/listserv/listserv\\_ind.php?list](http://www.arb.ca.gov/listserv/listserv_ind.php?list)