



Do You Know What Portable Means?

By Mike Buckantz, Associates Environmental, Inc.

If you are an owner of portable engines or equipment you should take advantage of the Statewide Portable Equipment Registration Program (PERP), but you shouldn't think of it as a blanket operating authority.

The PERP was created by the Legislature in the late 1990's in response to a request by the Construction Industry Air Quality Coalition (CIAQC) to establish a simple method to allow portable equipment to operate legally anywhere in California with a single registration. Prior to the PERP, portable engine and equipment operators needed to obtain up to 35 permits to be able to operate throughout California.

More than a decade after its inception, the good news is that the PERP remains one of the best air quality permitting bargains in the state. For \$620 you can get a 3-year registration to operate an engine anywhere in California. The bad news is that because local air districts enforce the PERP, the term "portable" means different things in different locations.

We all know that we can't operate portable equipment in a single location for more than 12 consecutive months, but it gets weird on the local level. For example:

- Did you know though that in San Diego you can't operate a PERP-registered crushing and screening plant for even one month to process recycled concrete at a collector yard if you ever intend to return to the same location?
- Did you know that in Imperial County you can't use PERP-registered engines and equipment on a channel construction project but that you would be allowed to use the same equipment on a freeway construction project in San Diego County?
- Did you know that the South Coast Air Quality Management District can't tell you if something meets the definition of "portable" until they see it?

These are only a few examples of the confusion that the local air district enforcement has caused. What's perfectly fine in one air district might get you fined in another. At that point the PERP isn't such a bargain after all.

Be sure that you understand the local air district's policies before you begin a project using your PERP registrations. A few other things to remember:

- When you receive a new PERP registration, or renew an existing registration, you must arrange for the local air district to inspect your engine or equipment within 45 days.
- If you operate a portable equipment unit (not an engine) in a location for more than 5 days you must notify the local air district in writing.
- If you own portable engines, whether they are registered in the PERP or if they have a local air district permit, you are subject to the Portable Engine Air Toxics Control Measure (ATCM). As a result, you should have submitted an initial status report to California Air Resources Board back on March 1, 2011. If you haven't submitted this report, you should now.

Mike Buckantz is Chief Executive Officer of Associates Environmental, Inc. an SCCA affiliate member. He wants to hear your "definition of portability" horror stories. If you have one to share call Mike at (714) 916-4953 x701 or e-mail mbuck@associatesenvironmental.com.