



December 22, 2010

**IMPORTANT INFORMATION RELATED TO THE STATEWIDE
PORTABLE EQUIPMENT REGISTRATION PROGRAM (PERP)
AND THE PORTABLE ENGINE AIR TOXIC CONTROL MEASURE (ATCM)**

Associates Environmental is providing this notice to inform you of upcoming changes and reporting requirements in the Statewide Portable Equipment Registration Program (PERP) and the Portable Engine Air Toxics Control Measure (Portable ATCM).

Effective January 1, 2011 portable diesel engines (off-road engines) rated at 175 horsepower (hp) or greater will need to meet the Tier 4 Interim (Tier 4i) emission standards. Since 2006 engines in this horsepower range met Tier 2 or Tier 3 emission standards. The PERP program requires that engines meet the most stringent emission standard in order to obtain a registration (except for flex units under the provision of 40 CFR Part 89.102 and CCR 2423(d)).

The portable engine regulations provide a six month window to register a non-road engine if it is submitted within six months of the effective date of the change in emission standard. Therefore, Tier 3 engines rated between 175 and less than or equal to 750 hp, and Tier 2 engines greater than 750 hp can still be registered through June 30, 2011. The table below indicates the engine tiers required for registration in each horsepower range:

Engine Horsepower Range	Tier(s) that Can be Registered Through June 30, 2011	Tier that Can be Registered Beginning July 1, 2011
50 - 74	Tier 4 Interim (Tier 4i)	Tier 4 Interim (Tier 4i)
75-174	Tier 3	Tier 3
175 - 750	Tier 3 or Tier 4 Interim (Tier 4i)	Tier 4 Interim (Tier 4i)
Greater than 750	Tier 2 or Tier 4 Interim (Tier 4i)	Tier 4 Interim (Tier 4i)

As you're probably aware, at the end of 2009 the California Air Resources Board (CARB) granted regulatory relief to operators of Tier 0 engines. An operator of Tier 0 engines was allowed to keep one Tier 0 engine greater than 500 hp or up to five (5) Tier 0 engines not to exceed a combined total power of 500 hp. Please keep in mind that any Tier 0 engines held as a result of this regulatory relief will need to be retired or replaced by December 31, 2010. You can still elect to designate Tier 0 engines as low use (operate no more than 80 hours per year) or emergency use. However, each Tier 0 engine designated as low use or emergency use will need to be replaced within two years of the first engine being offered for sale that satisfies the Tier 4 Final (Tier 4f) emission standards.

Engine Horsepower Range	Date Tier 4 Final (Tier 4f) is Scheduled to be Introduced	Anticipated Date Tier 0 Low Use & Emergency Use Engines Must be Replaced with Tier 4 Final (Tier 4f)
50 - 74	January 1, 2013	January 1, 2015
75-174	January 1, 2015	January 1, 2017
175 - 750	January 1, 2014	January 1, 2016
Greater than 750	January 1, 2015	January 1, 2017

Finally, we want to make you aware that EPA-certified marine engines can be registered in the PERP. On-road engines can be registered as well.



INITIAL INVENTORY REPORT DUE FOR THE PORTABLE ENGINE AIR TOXIC CONTROL MEASURE (ATCM)

The Portable Engine ATCM requires that a Status Report be submitted to CARB by March 1, 2011. The Status Report should include an inventory of all portable engines rated at greater than or equal to 50 hp that are either registered in the PERP **or permitted with a local air district**. Engines which are not subject to the Portable Engine ATCM (for example, crane auxiliary engines and marine engines) should not be included in the Status Report. If you have questions regarding which engines to include, please contact us and we'll help you figure it out.

The following items need to be included in the Status Report:

- The fleet's weighted average PM emission rate for the 2010 calendar year, including a summary for each portable engine that is part of the fleet and each engine's emission rate.
- An inventory of portable engines in the fleet identifying whether the engine is state-registered or permitted/registered with the local air district. Alternative-fueled engines should be identified by fuel type.
- The identity, if applicable, of each portable diesel-fueled engine that the owner commits to replacing with a Tier 4 engine.
- A listing of portable diesel-fueled engines, if applicable, used exclusively in emergency applications.
- A listing of portable diesel-fueled engines, if applicable, satisfying the low-use engine requirements.
- A listing of portable alternative-fueled engines, if applicable, added to the fleet prior to January 1, 2009 operating 100 hours or more per calendar year.

Associates Environmental is ready to assist you with the Portable ATCM reporting requirement. We can answer any questions you have relating to engines eligible for PERP registration and can also help you deal with the Off-Road Diesel Regulation, On-Road Truck & Bus Regulation, LSI Regulation and Periodic Smoke Inspection Program.

If we can help you navigate through any of the CARB regulations or answer any questions you might have, please call us at (714) 916-4953 or send us an e-mail.

Sincerely,

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