

**SAN JOAQUIN VALLEY UNIFIED
AIR POLLUTION CONTROL DISTRICT
COMPLIANCE DEPARTMENT**

COM 2060

APPROVED: _____ **SIGNED** _____ **DATE:** April 26, 2007
Jon Adams
Director of Compliance

TITLE: **RULE 2280 – PORTABLE EQUIPMENT**

SUBJECT: **INSPECTION OF DISTRICT REGISTERED PORTABLE
EQUIPMENT**

OBJECTIVE:

To establish policy and procedures for implementation of District Rule 2280. This policy will ensure uniform and equitable enforcement of the rule so that compliant sources are not operating at an economic disadvantage. Proper registration of equipment will also allow for a more accurate emission inventory database.

PURPOSE:

The purpose of this policy is to provide guidelines for District staff to utilize while inspecting Registered Portable Equipment. The information is intended to assure consistent enforcement actions.

POLICY STATEMENT:

District staff will enforce District Rule 2280, which limits the operation and emissions of portable equipment subject to registration. Failure to comply with registration conditions is a violation and may subject the source and the owner/operator to enforcement action.

I. PERMIT REQUIREMENTS

A. District-Registered Portable Equipment

Portable equipment may be registered either through the San Joaquin Valley Unified Air Pollution Control District (District) or through the California Air Resources Board (CARB). Businesses within the San Joaquin Valley operating specific types of portable equipment powered by internal combustion engines rated *above* 50 brake horsepower are subject to District registration. (See Rule 2280,

Section 2.0 for a listing of categories of portable equipment that may be registered through the District.)

An alternative to registering portable equipment is for the owner to obtain a Permit to Operate through the District. By definition, according to Rule 2020, Section 6.16, portable equipment (as defined in Rule 2280) is exempt from permit requirements. It may, however, be issued a Permit to Operate within the District in lieu of a portable equipment registration at the equipment owner's request.

B. All Eligible Portable Equipment

Failure to register or permit eligible portable equipment is a violation of District Rule 2010. A Notice of Violation will be issued for equipment lacking the proper permit or registration.

II. GENERAL GUIDELINES

A. Inspection Assignments

Area inspectors should inspect portable equipment subject to registration once the equipment is identified in the field and/or place of business. If observed during a compliance inspection for a stationary source, the equipment should be inspected in conjunction with the compliance inspection. Use appropriate forms to complete the inspection.

Proposed Registrations are issued by the District and act as a temporary permit much like an Authority to Construct serves as a temporary permit for a stationary emission source prior to the issuance of a Permit to Operate. The inspector receiving the proposal should conduct a start-up inspection of the Proposed Registration.

B. Pre-Inspection Procedures for Planned Inspections

Preparation for portable equipment compliance inspection includes, but is not limited to, the following:

1. Review the Rule - District Rule 2280
2. Review the File
 - a. Review registered equipment information. If possible, try to be familiar with the purpose/function of the equipment and how it relates to the registrant's business. District Portable Equipment

Registrations can be printed and viewed through the Central Region's PAS Database. The facility ID number is referenced as P-xxx. The "P" indicates portable registration.

- b. Review all registration conditions. Keep in mind that conditions for registered portable equipment may not be the same as those for permitted equipment.
 - c. Review previously submitted quarterly reports. These reports are usually scanned and stored in the PAS System under Registration Details/Documents.
 - d. Review past inspection reports, complaints, and enforcement actions, if available. A review of the facility's past and present compliance status will reveal whether there are problem areas that require closer attention during the inspection. Note any variance activity and pending/open enforcement actions.
 - e. Obtain the name of a contact person listed on the registration application. This person is likely to be the most familiar with the equipment and registration conditions.
3. Gather all necessary forms and equipment to conduct the inspection (i.e. inspection forms, blank VEE forms, registration conditions, and proper safety equipment such as hard hats, eye protection, ear protection, etc.) The District utilizes a standardized inspection form.

III. PERMIT REQUIREMENTS

A. General

A source under District permit is not eligible to register or bring in registered equipment to assist in operating equipment associated with the *normal operation* of the stationary source. A source could however register or bring in a registered engine to assist in operations not associated with the stationary source. (For example, a source could bring in an engine to assist in a repair operation, painting of equipment, or sandblasting.)

Portable equipment owners/operators are permitted on a source specific basis. Examples of sources eligible for a District registration are:

- a. Confined and unconfined abrasive blasting operations
- b. Concrete batch plants

- c. Well drilling, service, or workover rigs
- d. Power Generation (excluding cogeneration)
- e. Pumps
- f. Compressors
- g. Pile Drivers
- h. Welding
- i. Cranes
- j. Woodchippers
- k. Sand and gravel screening, rock crushing, and unheated pavement crushing and recycling operations

B. Exemptions

The provisions of this policy shall not apply to equipment considered exempt from District and State permit requirements (California Health and Safety Code Section 42310(e), District Rule 2280, Section 2.0, CCR Title 13, Section 2451).

Equipment not applicable to registration:

1. Any engine used to propel mobile equipment or a mobile vehicle
2. Any engine or equipment not meeting the definition of portable equipment.

C. Violations

A violation notice may be issued for all non-permitted sources, excepts as provided by the exemptions set forth above.

In order to provide compliance assistance to facilities in violation of rule requirements, the inspector is to give the owner/operator applicable permit applications and provide assistance in completing appropriate forms, as needed.

D. Registration Conditions

Registrants will typically have registration conditions attached to their District Registration. Conditions shall be enforced according to the Registration Conditions.

IV. INSPECTION PROCEDURES

A. General

Upon arriving at the facility, make a brief observation (if possible) of visible portable equipment that would require registration through either the District or CARB. After entering the facility, introduce yourself, and exchange business cards. Inform them as to the purpose of the inspection and explain that they will be advised of the results upon completion of the inspection.

The following is a recommended inspection sequence for registered portable equipment.

1. Conduct a Pre-Inspection Interview

- i. Determine if equipment subject to registration is in operation at the facility. Verify whether the registration is posted and/or readily available. Many operators keep the registration conditions with the equipment in protective housing. Some may opt to keep the registration elsewhere on a worksite, such as inside the operator's trailer.
- ii. Verify that any required records are being kept in accordance with registration conditions.
- iii. Verify that any/all required notification has been given according to registration conditions.

2. Inspect Portable Equipment

- a. Inspect all sources of potential emissions including emergency generators, air compressors, pumps, etc.
- b. Identify registered equipment and verify whether the equipment is as described in the equipment registration.
- c. Verify the engine's make, model, and serial number.
- d. Verify that the unit meets the requirement for portable equipment.
- e. Inspect the engine for controls, such as aftercooler/intercooler, turbocharger, PCV, and/or catalyst.

- f. Verify the unit has a non-resettable hour meter, or an alternative method of gauging runtime.
3. Conduct a Visible Emissions Evaluation (VEE) if the equipment is operating under normal operating conditions.
4. Document all observations on inspection checklist.

V. RECORD KEEPING

A. General

Record keeping requirements outlined on registration conditions and set forth by the District must be observed. A violation notice should be issued if compliance with hours of operation, location duration, and or fuel usage limitations cannot be determined due to missing records.

1. Quarterly reports must be submitted to the District for District registered portable equipment according to Rule 2280.
2. Records should indicate the location(s) at which the equipment was operated, including the dates operated at each location, type and quantity of fuel used, daily hours of operation, and quantity of material processed by each emissions unit, or the daily hours operation in conjunction with hourly throughput rate.

B. Incomplete Records

These are records where information is omitted but the owner/operator is making a reasonable effort to comply with the regulation or registration condition. Where a reasonable effort has been made to keep records and compliance with registration conditions can be demonstrated, a notice to comply may be issued. Refer to the NTC policy for further guidance.

VI. POST INSPECTION PROCEDURES

The following items should be discussed with the owner/operator in a post-inspection interview:

- A. Discuss the overall condition of the equipment. Review the results of the inspection.
- B. Review all registration conditions and discuss applicable rules and regulations.

- C. Review records evaluation, advise source of any deficiencies, and discuss improvement areas.
- D. Issue appropriate NTC/NOV and review compliance options.
- E. Provide compliance assistance information as necessary, including pamphlets, appropriate rule copies, and brochures. Make appropriate recommendations to improve compliance and to facilitate future inspections. The goal of a successful compliance inspection is to ensure that the owner/operator has sufficient information and understanding of regulations to maintain continued compliance.

Inspection reports for District registered equipment are submitted the same as a stationary source inspection report. The 'P' in the facility ID number must be included to ensure proper scanning and filing in PAS.

FORMS: (Attached)

1. San Joaquin Valley Unified Air Pollution Control District Registered Portable Equipment
 - a. Portable Equipment Record Keeping/Reporting Form

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

PORTABLE EQUIPMENT RECORDKEEPING/REPORTING FORM

Company Name: _____ Registration #: _____

Equipment Description: _____

Complete Sections 1 through 5 below

1	2		3		4 (complete A or B)			5 (complete A or B)		
DATE	EQUIPMENT LOCATION	FUEL TYPE/ MATERIAL PROCESSED		A			B			
		FUEL	MATERIAL	Qty Fuel	Daily Oper Hrs	Hourly HP or BTU Rating	Qty Material Processed	Daily Oper Hrs	Throughput Rate	