October 26, 2009

COMPLIANCE ADVISORY

CLARIFICATION OF SPECIFIC PROHIBITIONS INVOLVING THE OPERATION OF EQUIPMENT UNITS REGISTERED IN THE STATE’S PORTABLE EQUIPMENT REGISTRATION PROGRAM (PERP)

The Portable Equipment Registration Program (PERP) was established by the California Air Resources Board (CARB) in 1997. PERP is a voluntary program that provides an alternative permitting mechanism to obtaining individual operating permits from local air districts. This program is available to owners and operators of portable engines or portable equipment units such as rock crushing plants, sand and gravel screens, pavement crushers and recyclers, and concrete batch plants.

Be aware that under certain circumstances, portable equipment registered in the PERP cannot operate at stationary sources permitted by the San Diego County Air Pollution Control District (District). For example, a portable rock crushing plant registered in the PERP cannot operate at a stationary rock crushing plant if both operations share a common raw material, or if the PERP equipment is supplementing the permitted operation, or a PERP-registered pavement crusher and recycling plant cannot operate at a permitted stationary source if the crushed, recycled asphalt or concrete is used in the stationary operation. Such operations invalidate the PERP registration, and the owner or operator must file an application and receive a District Permit to Operate for such equipment prior to commencing operations.

Additionally, be aware that asbestos and asbestos containing compounds have been widely used in the manufacture of construction and building materials. Common construction debris that may contain asbestos includes concrete, stucco, plaster, drywall, floor and ceiling tile, cement pipe, roofing products, and acoustic ceiling materials, among others. If asbestos containing demolition debris is recycled, the crushing, grinding, abrading, and other processing actions may cause the release of hazardous asbestos fibers resulting in a violation of federal and local laws. PERP registrations are also not valid for equipment units operating at a location if by virtue of the activity to be performed hazardous air pollutants (e.g., asbestos) will be emitted. Building materials should be screened for the presence of asbestos prior to being recycled.

For more information about PERP, please visit CARB’s website at http://www.arb.ca.gov/portable/portable.htm. For more information about screening for the presence of asbestos in building materials or construction debris, please contact our Compliance Division at (858) 586-2600. If you have any questions concerning this Advisory or the PERP requirements, please contact Jorge López at (858) 586-2682.

JL:jlm