Comment 1 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Lorena
Last Name: Fisher
Email Address: lorena@nceca.org
Affiliation:

Subject: financial impact to construction industry
Comment:

```
Please see the attached letter.

Thank you,

Lorena Fisher
```

Attachment: www.arb.ca.gov/lists/perp07/4-emission_concern_to_carb.pdf

Original File Name: Emission concern to CARB.pdf

Date and Time Comment Was Submitted: 2007-02-21 09:44:14

No Duplicates.

Comment 2 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 3 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 4 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: James
Last Name: Bury
Email Address: buryj@putzam.com
Affiliation:

Subject: Resident requirement issues remain
Comment:

```
Please see attached letter.

Thank you,

James Bury
Putzmeister America
```

Attachment: www.arb.ca.gov/lists/perp07/10-pm_letter_to_arb.doc

Original File Name: PM letter to ARB.doc

Date and Time Comment Was Submitted: 2007-03-13 07:13:07

No Duplicates.

Comment 5 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Richard
Last Name: Aguilera
Email Address: r.aguilera3@cox.net
Affiliation:

Subject: New registration fees are highway robbery
Comment:

```
I would like to see the registration for the use of portable small
equipment open again. I  never received a letter or notice on this
matter.

The fee for registration before Dec. 31 2006 was around
$300.00, now they want around $1800.00. I don't think this is fair
since I was never formally informed of this matter.

I would agree to pay the initial $300.00 as originally  required,
but the  $1800.00 is highway robbery .

Richard Aguilera
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-19 08:16:15

No Duplicates.

Comment 6 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Thomas
Last Name: Thornton
Email Address: thorn@undergrnd.com
Affiliation: Underground Construction Co., Inc.

Subject: PERP Registration Requirements
Comment:

The PERP program is both confusing and cumbersome. I have tried to register 4 pieces of equipment with the ARB,and after using and following the online instructions, all four applications were returned with multiple additional requests for information. Those who are employed full time by the ARB may know and understand the confusing acronyms and rules, but those of us that are affected by them rarely have a lot of available time that it takes to read and hopefully understand them.

I suggest that a much simpler approach be implemented; that all machines have a phase out from the date of manufacture. In our company, much of our equipment is depreciated over a period of 15 years. I would suggest that equipment be allowed use for 15 years or 7,500 hours (which ever occurs first), after which it must either be re-powered with a compliant power source or scrapped.

I would also suggest that any rule be implemented state wide, avoiding special rules from the 35 air districts. Having individual Air Districts and thier rules only adds to the chaotic state we must operate in.

We all want clean air and a healthy environment, but we also need to have a healthy economic state. We must work towards crafting rules that encourage willing participation and the success of our businesses that drive our State's economy.

After submitting message (Comment 12) minutes ago, I realized that I should have shared some data with you.

Our company has 51 air compressors in our fleet, powered by diesel engines of up to 80 hp. Of these compressors, 23 are powered by Tier 0 engines that can not be registered (6 have 51 hp engines, the rest have 80 hp).

These compressors have 500 to 3,000 hours of use recorded on their hour meters, with many years of usefull life remaining.

Since we can no longer lawfully use these compressors in this state, the cost of replacement will be $11,811 each, for a total of $271,657.00.

Obviously, this is a significant financial burden placed on our company.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-19 14:19:09

No Duplicates.

Comment 7 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Allan
Last Name: Lind
Email Address: allanlind@sbcglobal.net
Affiliation: CCEEB

Subject: 03/22/07 Agenda Item 07-3-3
Comment:

```
Please see the attached letter from CCEEB commenting on Proposed
Amendments to the PERP Regulation and ATCM.
```

Attachment: www.arb.ca.gov/lists/perp07/15-cceeb_comment_letter_on_perp_reg_-_atcm_031907.doc

Original File Name: CCEEB Comment Letter on PERP Reg - ATCM 031907.doc

Date and Time Comment Was Submitted: 2007-03-19 16:26:58

No Duplicates.

Comment 8 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Christi
Last Name: Collins
Email Address: christi@concretepumpers.com
Affiliation: American Concrete Pumping Association

Subject: Changes to the Portable Engine Registration Program
Comment:

March 20, 2007

California Air Resources Board
Dr. Robert Sawyer, Chairman
1001 I Street
Sacramento, CA 95812

Dear Members of the ARB,

The emergency amendment last December to re-open the Portable Registration Program was only the first step towards rectifying a gross injustice to the owners of portable engine equipment owners and to the residents of the state of California. This program still has many problems that need to be resolved before a permanent decision on the temporary changes becomes final.

1) Tier 0 engines need to be allowed into the statewide program. Just because you don't want Tier 0 engines into the program, doesn't mean they don't exist. They still continue to operate in this state every day. Allow the statewide registration program to fulfill its intended function and identify where these types of equipment are located. The statewide registration program should be an all inclusive program and not divided up amongst individual air districts – which may or may not even allow the engines into their program.

2) The "resident engine" policy will have costly and long term effects to the California used construction equipment market. Unless an equipment's engine was previously operated in California, a brand new piece of equipment containing a Tier 3 engine must be purchased. Upgrading to new equipment is very costly to the small business owner and in fact, only just now becoming available. The first Tier 3 engine in the portable concrete pumping industry was just sold this past January. These engines are NOT readily available and will not be until much later. By matter of record, we also know that not very many, if hardly any at all, portable Tier 1 and Tier 2 engines were registered up until December, 2006 in the statewide program. This leaves a very limited quantity of used equipment available. What do you do if you can't buy used equipment? I would hate to think that as a consumer, I had to buy a brand new car every time a cleaner model engine was produced. It is simply impractical.

3) The revised fee schedule is unjust. In fairness to those who

actually registered their equipment in earlier years, we supported a late penalty for registration fees. However, charging for inspection fees when the inspections were not administered seems punitive. I would urge you to reconsider the fee schedule and reduce the fees by the yearly inspection fee.

My comments only reiterate what you have heard before. You've heard from many associations, organizations, and individuals who have all given you the same message in various ways. Your work is not done. Let's take a practical approach and create a model program that can be viewed by other states as one that creates a cleaner environment and in doing so doesn't break the backs of the small business owner. To leave the program "as is" without taking into consideration the suggestions you will hear on Thursday is simply wrong.

Sincerely,

Christi Collins
Executive Director, ACPA

Attachment: www.arb.ca.gov/lists/perp07/16-comments_for_carb_hearing_march_22.doc

Original File Name: Comments for CARB hearing March 22.doc

Date and Time Comment Was Submitted: 2007-03-20 08:26:45

No Duplicates.

Comment 9 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: james
Last Name: shea
Email Address: james.shea@jfshea.com
Affiliation:

Subject: comments on proposed amendments to PERP
Comment:

```
Please read attached letter. Thank You.
James Shea
```

Attachment: www.arb.ca.gov/lists/perp07/17-letter_to_board_of_carb-032007.doc

Original File Name: Letter to Board of CARB-032007.doc

Date and Time Comment Was Submitted: 2007-03-20 14:12:09

No Duplicates.

Comment 10 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Cash
Last Name: Benton
Email Address: cashscca@sbcglobal.net
Affiliation: SCCA

Subject: Re: Changes to the portable engine registration program
Comment:

March 20, 2007

Dr. Robert Sawyer, Chairman
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Re: Changes to the portable engine registration program

Dear Dr. Sawyer:

The Southern California Contractors Association (SCCA) represents the interests of union-signatory heavy construction contractors in the 12 southern-most counties in our state. We have been actively involved in air quality issues on behalf of our members throughout our 34-year history and are a founding member of the Construction Industry Air Quality Coalition (CIAQC).

Among our concerns is the current state of the portable engine regulations. While most of our members have complied with the portable engine registration program (PERP) requirements, we have new companies who joined our association specifically to get our assistance in dealing with your regulations.

To that end, we are requesting three specific changes to the proposed amendments to the regulations:

1. Reopen the PERP to allow registration of equipment with Tier 0 engines. This category of equipment makes up the majority share of portable equipment in our region and the state. While your agency has enrolled some 25,000 engines in the PERP, this represents less than 15 percent of the total universe of this equipment class.

2. End the resident engine requirements established in December 2006. This was an ill-conceived notion when introduced. One of the goals of the portable regulations is the elimination of Tier 0 engines by December 31, 2009. This goal will go unrealized unless contractors can bring used certified engines into the state.

3. Lower the punitive fees for registering older equipment. Our reading of the legislative intent of this program gives you authority to establish fees for the operation of the program, but there is no authorization for punitive financial acts. If your goal is voluntary compliance with the regulations, these

outrageous fees will inhibit otherwise willing participants from enrolling in the PERP.

SCCA is a willing participant in the effort to clean California's air, but we recognize that our contractors are not responsible for the engines that power their equipment—that honor goes to the federal Environmental Protection Agency and the equipment manufacturers. The current state of the portable regulations is a clear-cut case of punishing the innocent.
We ask that the Board enact the changes we have requested.

Respectfully Submitted

D. Cash Benton
Executive Vice President, SCCA

Attachment: www.arb.ca.gov/lists/perp07/18-letterto_arb.doc

Original File Name: Letterto ARB.doc

Date and Time Comment Was Submitted: 2007-03-20 15:13:21

No Duplicates.

Comment 11 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Michael
Last Name: Graboski
Email Address: msgraboski@speedtrail.net
Affiliation: American Rental Association

Subject: Comment Re PERP Rule Changes
Comment:

```
This comment is from Dr McClelland and Dr Graboski of the American
Rental Association (ARA) re finalization of the PERP emergency
action of fall 2006.
```

Attachment: www.arb.ca.gov/lists/perp07/19-comment-finalization-emergencyaction-3-2007_-final.doc

Original File Name: Comment-finalization-emergencyaction-3-2007 -final.doc

Date and Time Comment Was Submitted: 2007-03-20 16:03:04

No Duplicates.

Comment 12 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Jeb
Last Name: Stuart
Email Address: jebstuart@sbcglobal.net
Affiliation: CIAQC

Subject: CIAQC Comments to ARB on Amendments to PERP
Comment:

March 19, 2007

Dr. Robert Sawyer, Chairman
California Air Resources Board
1001 “I” Street
Sacramento, CA 95812

Dear Dr. Sawyer:

A great deal has been written concerning the Air Resources Board’s portable equipment program and the recently adopted emergency regulation disallowing registration of the 6,000 to 10,000 Tier 0 engines after the effective date of that regulation. As a former Executive Officer of the South Coast Air Quality Management District, I can appreciate the frustration regulators felt trying to persuade owners for several years to register their portable equipment so it could be operated legally, and I can understand their compelling desire to punish those owners for failing to comply by permanently prohibiting their registration even though previously registered Tier 0 engines can continue to operate until 2010.

ARB needs to remember that over 80% of portable equipment owners have never been exposed to ARB, district regulations or their web sites and, therefore, are totally unaware of their powers and jurisdiction. After all, this is the first time ARB has regulated the equipment of small private owners. So their lack of response to the ARB registration edict is not surprising.

ARB and the air districts must consider that, unless their annual operating budgets are increased dramatically, their enforcement personnel will probably not be able to enforce a statewide prohibition on that many engines with the limited number of inspectors available and their other higher priority responsibilities.

Also, as I recall, CAPCOA did indicate when the ARB adopted its emergency regulation in December 2006 prohibiting the operation of unregistered Tier 0 portable engines, the California Air Pollution Control Officers Association (CAPCOA) offered to allow Tier 0 engines to be registered in some of its districts.

Consequently, ARB should weigh the merits of offering a compromise to portable equipment owners by allowing them to register their Tier 0 engines until 2009, when they would be required to be

replaced with certified engines.

In my judgment, registering those engines now would in the long run be in the best interests of air quality.

Respectfully,

Jeb Stuart
Construction Industry Air Quality Coalition

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-21 08:24:40

No Duplicates.

Comment 13 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Bill
Last Name: Davis
Email Address: williamedavis@cox.net
Affiliation: ACPA/EUCA/SCCA

Subject: The Potemkin Regulation of Portable Equipment
Comment:

Remarks to the California Air Resources Board, regarding the Portable Equipment regulations, March 22, 2007

When we last met to discuss the proposed amendments in Bakersfield, we noted how thin your ranks had become and quoted from Shakespeare's Henry the Fifth about your "happy few, your band of brothers." We would like to welcome new members Supervisor Jerry Hill and Dr. Daniel Sperling, to the "band" and to these discussions.

Today I would like to use an example from Russian history to put the current state of the portable regulations in perspective.

Catherine the Great made an "Imperial Tour" of the Ukraine and the Crimea in 1787, at the behest of her former lover Prince Grigory Potemkin, the new governor general for the region. For much of the trip they sailed on a barge down the Dnieper River. Potemkin pointed out all the improvements he had "built," with happy villagers singing and waving from the shore. They greeted Catherine with impressive displays including a regiment of 200 beautiful sharp-shooting Amazons, 20,000 rockets and 55,000 burning pots spelling out the initials of the empress at various stops. All this required a certain amount of stage management. Orders went out to hide the beggars, paint facades, and erect stage fronts to conceal the real shacks along the river.

So was born the expression "Potemkin Village," using the Prince's name as a synonym for "sham," creating a public perception at odds with reality. We believe the phrase "Potemkin Regulation" aptly describes the current state of the regulation of portable construction equipment in California.

According to the Census Bureau, there are more than 234,000 construction companies in the state but according to the Economic Impact Analysis in your Initial Statement of Reasons (ISOR), only 2,246 private companies have registered 22,097 pieces of equipment in the PERP. If only half of the 234,000 companies owned only one portable engine there should be more than 109,000 units in the PERP—and construction is only one of 34 industries impacted by the portable regulations.

The Economic Impact section of the ISOR says only 10,000 "older engines" will register in the next three years; we believe that number should be closer to 100,000 additional engines and, given the characteristics of our industry, at least two thirds of those

engines are Tier 0 units. The ISOR estimates the registration cost to industry at $ 6.6 million for these 10,000 engines; if the ratios hold, we think registration cost will be closer to $67 million over the next three years—and that does not include the cost of replacement of Tier 0 equipment by December 31, 2009—which, given this example, would be $1.65 billion.

This regulation will not achieve the goal of actually reducing emissions from this equipment by ignoring this reality. To regulate this equipment you have to know where it is, who owns it and what they do with it. To do that, you must reopen the PERP to Tier 0 engines and vastly increase your outreach efforts.

Second, given the scope of our equipment fleet, you must understand that you cannot make it disappear by Imperial decree. The industry must have more time to acquire new equipment that will result in real emission reductions. Equipment manufacturers are licking their lips at the opportunity to replace 100,000 California units, but given their levels of production and global competition for this equipment, it will take them at least 15 years to replace the fleet.

Part of this demand for certified engines would normally be achieved by buying newer used equipment, but not with the current "resident engine" rules. No equipment owner in California will be selling compliant engines on the used market unless they are going out of business. Our industry must have access to the global market of certified equipment, including Tier 1 and Tier 2 machines from outside the state.

Finally, we remind the Board of the first rule of construction—"Measure twice, cut once."

To that end, we request that Dr. Sawyer appoint a Construction Industry Task Force to take the portable regulations out of the Potemkin world and into the real world by:

•Accurately measuring the scope of the affected industries
•Consolidate all regulations impacting the construction industry
•Work with the agency to develop meaningful emission reductions to benefit all Californians.

We believe this taskforce should consist of Dr. Sawyer, Dr. Sperling for his expertise in the world of power systems, representatives of the major construction associations, construction equipment manufacturers, CIAQC and representatives from the environmental community.

We hope our recommendations will meet with the Board's approval so that we can all move forward from these contentious proceedings to an environment of understanding, cooperation and truly improved air quality.

Bill Davis works with the American Concrete Pumping Association, Construction Industry Air Quality Coalition, Engineering and Utility Contractors Association, and the Southern California Contractors Association to inform their members on issues involving air quality regulations in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-21 08:44:28

No Duplicates.

Comment 14 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Mike
Last Name: Cusack
Email Address: mcusack@concopumping.com
Affiliation: Conco Pumping

Subject: Comments to the PERP Registriation
Comment:

See Attached PDF File

Attachment: www.arb.ca.gov/lists/perp07/22-california_air_resource_board_letter_head_march_2007.pdf

Original File Name: California Air Resource Board Letter Head March 2007.pdf

Date and Time Comment Was Submitted: 2007-03-21 08:55:38

No Duplicates.

Comment 15 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Dave
Last Name: Cox
Email Address: SENATOR.COX@SEN.CA.GOV
Affiliation: Senator, First District

Subject: Amendments to the Statewide PERP Reg. & the ATCM for Diesel-Fueled Portable Engines
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perp07/23-perp07-15.pdf

Original File Name: perp07-15.pdf

Date and Time Comment Was Submitted: 2007-03-21 09:27:32

No Duplicates.

Comment 16 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Tara
Last Name: Haas
Email Address: thaas@euca.com
Affiliation: Engineering & Utility Contractors Assn.

Subject: Tier 0 Equipment Must be Included in PERP
Comment:

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear Board Members:

While we all want to do our part in reducing air pollutants, the PERP regulation disproportionately impacts the construction industry's contribution to better air quality (much like your pending regulation on off-road diesel equipment). Specifically, not allowing the registration of Tier 0 portable engines in the PERP places significant financial impacts on users to replace their Tier 0 engines, or face significant penalties and fines.

The natural attrition for these older engines being replaced with newer, cleaner engines will already improve air quality in the coming years. Forcing the "replacement or penalty" provisions of the PERP rule on Tier 0 engines will only create evaders who simply cannot afford to replace their engines and remain competitive in an industry which operates on tight profit margins (a concept those drafting the off-road diesel engine rule should familiarize themselves with).

The ARB seems to think that the construction industry is responsible and can afford to bear the cost to replace all their older equipment. Both are not true. Additionally, the PERP regulation impacts small and minority owned companies that operate on even slimmer profit margins. Those that you refer to as "scofflaw's" are simply trying to stay in business, or have difficulty in navigating this complex and combursome regulation. EUCA members have voiced to me that they have tried to register eligible equipment in the PERP, but have had application after revised application returned.

As we look forward to the coming years of our industry following the intent of the Governor to rebuild California's aging infrastructure, we must consider the impacts of these rules on the workforce and companies who will be expected to perform the work that the public is overwhelming supportive of. Companies currently operating in California will be forced to spend extraordinary amounts of capital to meet the requirements of the CARB, or become "scofflaws". Larger companies performing work in multiple states may simply choose to bid elsewhere, thus reducing the competition and increasing project costs to our state, reducing the amount of projects that can be built with the available funds.

I strongly suggest that the Board again carefully consider the broad impacts of the PERP regulation on the construction industry. As a member of CIAQC, the members of EUCA also urge you to adopt CIAQC's recommendations and continue to work with this group towards regulations that will result in economically balanced clean air regulations.

Sincerely,

Tara Haas
Director of Government Relations
Engineering & Utility Contractors Association

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-21 09:28:46

No Duplicates.

Comment 17 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Allan
Last Name: Daly
Email Address: adaly@sierraresearch.com
Affiliation:

Subject: Crane Owners' Comments
Comment:

```
Please see the attached letter for comments submitted on behalf of
the Mobile Crane Operators Group and the Crane Owners Association.
```

Attachment: www.arb.ca.gov/lists/perp07/25-perp-atcm_comments_3-21.pdf

Original File Name: PERP-ATCM Comments 3-21.pdf

Date and Time Comment Was Submitted: 2007-03-21 10:25:00

No Duplicates.

Comment 18 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 45 Day.

First Name: Louis
Last Name: Davies
Email Address: sldavies@dm-tech.net
Affiliation: California Rental Association

Subject: Proposed Regulation for Portable Equipment
Comment:

As a small business owner of an Equipment Rental Business, I am concerned about the regulations that have been implemented and that are proposed. We will be forced to close our business if we have to pay high fees to register our equipment and/or purchase new equipment. In a small town, we have been able to remain in business by buying used equipment and keeping it well maintained. However, it is all older and does not meet your proposed regulations. We cannot afford to buy brand new equipment, and still make a profit to live on. Some things only rent seasonally, other things on a regular basis. This may force many business to sell old equipment and then none of it will be worth anything at all, so we lose again. There must a happy medium that can protect the air quality and yet let us remain in business. Between your program, DMV fees, Insurance premiums, OSHA, State Compensation rates and fuel prices, we are in danger of no profit and closing our business. I thought California was trying to make the state business friendly. It does not seem like it to a small business in a small town in the Sacramento Valley. Please consider all the implications of your proposals, not just the huge contractors and jobs that have unlimited resources.
Thank you
Louis Davies, Corning Rentals, Corning Ca.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-03-21 10:28:24

No Duplicates.

Comment 1 for Portable Equipment Registration Program 2007 (PERP) (perp07). (At Board Hearing)

First Name: Patrick
Last Name: Hurley
Email Address: patrickchurley@yahoo.com
Affiliation: CA Quartz Crystals & Pat's Tree Service

Subject: Amendments to the Statewide PERP Reg. & the ATCM for Diesel-Fueled Portable Engines
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perp07/28-perp07-ws-1.pdf

Original File Name: perp07-ws-1.pdf

Date and Time Comment Was Submitted: 2007-03-23 10:34:20

No Duplicates.

Comment 1 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 15-1.

First Name: Chris
Last Name: Brown
Email Address: browncd@co.mendocino.ca.us
Affiliation: Mendocino County AQMD

Subject: 15 day Comments on PERP amendments
Comment:

```
See attached letter.
```

Attachment: www.arb.ca.gov/lists/perp07/114-mcaqmd_perp_july_07.pdf

Original File Name: MCAQMD PERP july 07.pdf

Date and Time Comment Was Submitted: 2007-07-02 09:42:52

No Duplicates.

Comment 2 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 15-1.

First Name: John
Last Name: McClelland
Email Address: john.mcclelland@ararental.org
Affiliation: American Rental Association

Subject: Comments
Comment:

```
Please find attached the comments of the American Rental
Association related to the modifications to PERP and the Portable
ACTM.
```

Attachment: www.arb.ca.gov/lists/perp07/133-comment_june_2007_modifications_to_perp_and_portable_atcm-2.pdf

Original File Name: Comment June 2007 Modifications to PERP and Portable ATCM-2.pdf

Date and Time Comment Was Submitted: 2007-07-16 08:31:30

No Duplicates.

Comment 3 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 15-1.

First Name: Karl
Last Name: Lany
Email Address: klany@scec.com
Affiliation:

Subject: PERP 15-day Notice Comments
Comment:

```
PERP Comments attached.
```

Attachment: www.arb.ca.gov/lists/perp07/134-perp_15_day.pdf

Original File Name: perp 15 day.pdf

Date and Time Comment Was Submitted: 2007-07-16 09:47:25

No Duplicates.

Comment 4 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 15-1.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 5 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 15-1.

First Name: Allan
Last Name: Lind
Email Address: allanlind@sbcglobal.net
Affiliation: CCEEB

Subject: PERP Regulation and ATCM
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/perp07/136-140_perp_15-day_commentletter.pdf

Original File Name: 140 PERP 15-Day CommentLetter.pdf

Date and Time Comment Was Submitted: 2007-07-16 17:17:26

No Duplicates.

Comment 6 for Portable Equipment Registration Program 2007 (PERP) (perp07) - 15-1.

First Name: Bob
Last Name: Shepard
Email Address: Non-web submitted comment
Affiliation: Quinn Power Systems

Subject: Portable Equipment Registration Program
Comment:

```
Please see the attached comment.
```

Attachment: www.arb.ca.gov/lists/perp07/145-perp07-15day-6.pdf

Original File Name: perp07-15day-6.pdf

Date and Time Comment Was Submitted: 2007-07-20 07:09:05

No Duplicates.