

## **Comment 1 for Commercial Harbor Craft (chc10) - 45 Day.**

First Name: bill  
Last Name: halpin  
Email Address: whalpin@adbrokerz.com  
Affiliation: none

Subject: Excessive Diesel Fumes from Oil Service Boats  
Comment:

Clerk- Air Resources Board

1001 I Street, Sacramento, CA 95814  
<http://www.arb.ca.gov/lispub/comm/bclist.php>

There is a service boat that takes workers to the oil islands from the Seal Beach pier daily.

The boat that transports workers and equipment to the oil platform, usually the "Capt T Li" exudes an inordinate amount of diesel smoke and I was told that starting in 2009 there were restrictions going into force that would require more efficient engines.

The noxious fumes are "re-directed" by a consistent breeze that pushes the fumes on shore. The boat takes on passengers from the pier about 500 feet from the sand and the homes and the people on the beach.

The situation is exacerbated by the fact that the boat(s) do not tie-off on the pier and idle while loading. They continue to run the engines to control their position which is in the surf line and therefore requires quite a bit of acceleration to keep the boat close to the pier. The racing engine, of course, belches more fumes than an idling engine would. It is not a quick stop and go arrangement. The boat goes back and forth for anywhere from 5 minutes to as much as one half an hour. (Admittedly 30 minutes is unusual but I've timed it and it does occur.)

There is a children's play area DIRECTLY in the line of the path of the fumes. There are also apartments approximately 200 yards away. I mention apartments because apartment dwellers are not as likely as homeowners to complain.

I cannot rate the various problems as to which is worst, however, here are some that I can tell you about:

1-Boat does not tie-up to the pier dock so it never shuts off. It could tie-off if it accepted responsibility for any damage it did to the pier. Not an unusual request for boats using public piers. In weather it deems too rough, the boat goes to a sheltered pier in Long Beach to pick up its passengers.

2-Those living near the pier get the fumes 24/7...so since diesel fumes damages are cumulative they are suffering

greatest damage.

3-Toddlers playground is second only to pedestrians on the pier in their exposure.

4-Because it is "idling" at the surf line the idle is usually very strong. It has to be because the surf catches the boat and it could easily ground on bottom. Obviously when the engine revolutions shoot up...so do the diesel fumes.

5-Sometimes it runs for up to 20 minutes or more. The boat may make as many as 30 or 40 trips a day. Maybe more?  
(See attached link for local story and photos.) Photos are not enhanced. In fact they do not project the fumes as strongly as the naked eye sees them.

[http://www.whatsupinsealbeach.com/category/local\\_news/page/2/](http://www.whatsupinsealbeach.com/category/local_news/page/2/)

6-Fishermen and people walking the pier face closer exposure but if the wind is in the opposite direction they are not so exposed as the beach goers. The prevailing winds are on shore.

7-The city gets about \$25,000 revenue for allowing the boat to use the pier and an additional \$25,000 for other services it provides and looks on the boat company as a "very good tenant"; however, I doubt that the people making the decisions live in the path of the diesel smoke.

8-As you may be aware the city of Seal Beach started repairs on the pier a few years ago without gaining approval from the Coastal Commission and the CCC stopped the work. It makes one wonder if the City needs similar permission to authorize the operation of the boats and did it get it ?

Additionally, there is a loading dock on the pier that could be used. In other communities with piers such craft as might use the dock have provided the city with guarantees to repair any damage done by their boat. Such an arrangement would greatly reduce the problems created by the "Capt. T Li."

I appreciate your reading this letter and look forward to any help or directions you can give.

Sincerely,

Bill Halpin  
562-244-1116  
whalpin@adbrokerz.com

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-05-24 09:33:20

No Duplicates.

## **Comment 2 for Commercial Harbor Craft (chc10) - 45 Day.**

First Name: Megan

Last Name: Shahnazarian

Email Address: megan@amarinecorp.com

Affiliation: American Marine Corporation

Subject: Carl Moyer Engine Applications

Comment:

Hello,

My comment is to first say how much the Carl Moyer program has helped my company, American Marine Corporation to comply with CARB regulations. We would not have been able to afford to cover 100% of the cost to re-power our fleet of vessels without their help. We have gotten partial funding for one tug boat and 3 crew and supply vessels in the past year and a half. Today we have an application in for 4 more vessels, 3 of which are crew boats with model years of 1982. I was told by Mark Coleman of AQMD that we would be able to receive funding for these vessels because they were not yet regulated under the current Commercial Harbor Craft rule. I had not applied for funding for them earlier, because I thought that they were already regulated and that Carl Moyer would not grant funding since we would not show an excess of 3 years of surplus.

Once I found out that Carl Moyer would fund these engines I immediately applied in this last round of funding and am waiting for an executed contract with AQMD. Unfortunately, if this amendment is passed, Carl Moyer will not grant us funding for these vessels because we will not show 3 years of surplus since the date of compliance for vessels with >1500 hours is 12/31/2011 and the date of compliance for vessels with 300-1500 hours is 12/31/2012.

Our best chance to get this funding is if AQMD can rush the execution of our contract before the amendment is accepted, but I am afraid that we may not get the executed contract in time. If we had to pay for 100% of the re-power for these vessels it would be an extreme financial hardship. We are concerned for the environment and want to do everything in our power to do our part which is why we have continued with the re-powers with the financial support of Carl Moyer.

Please consider my plea to potentially alter the compliance dates so that we have at least 3 years to comply and thus can show three years surplus to Carl Moyer or to finalize the current Carl Moyer/AQMD contracts before passing the amendment.

I understand this is a selfish request, but we have been in business at the Port of Los Angeles since 1982. We provide valuable services to the city and to our fellow businesses in the harbor.

I truly appreciate any help.

Respectfully,  
Megan Shahnazarian

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-05-27 12:05:54

No Duplicates.

### **Comment 3 for Commercial Harbor Craft (chc10) - 45 Day.**

First Name: Charlie

Last Name: Bills

Email Address: Non-web submitted comment

Affiliation:

Subject: Harbor Craft Regulations

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/chc10/3-charliebillschc.pdf>'

Original File Name: CharlieBillsCHC.pdf

Date and Time Comment Was Submitted: 2010-05-28 13:37:19

No Duplicates.

## **Comment 4 for Commercial Harbor Craft (chc10) - 45 Day.**

First Name: Michael

Last Name: Villegas

Email Address: mike@vcapcd.org

Affiliation: Ventura County APCD

Subject: Support Letter for CHC Regulation

Comment:

see attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/chc10/4-vcapcd\_support\_ltr\_chc\_regulation.pdf'

Original File Name: VCAPCD Support Ltr CHC Regulation.pdf

Date and Time Comment Was Submitted: 2010-06-16 09:40:07

No Duplicates.

## **Comment 5 for Commercial Harbor Craft (chc10) - 45 Day.**

First Name: Barry  
Last Name: Wallerstein  
Email Address: bwallerstein@aqmd.gov  
Affiliation: South Coast AQMD

Subject: Commercial Harbor Craft  
Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/chc10/5-carb\_re\_commercial\_harbor\_craft\_cmts\_062210.pdf'

Original File Name: CARB re Commercial Harbor Craft Cmts 062210.pdf

Date and Time Comment Was Submitted: 2010-06-22 16:29:29

No Duplicates.

## **Comment 6 for Commercial Harbor Craft (chc10) - 45 Day.**

First Name: Ron

Last Name: Tan

Email Address: tanr@sbcapcd.org

Affiliation: Santa Barbara County APCD

Subject: Comment letter on Amendments to Commercial Harbor Craft Rule

Comment:

Please acccept this comment letter from the Santa Barbara County APCD for the Proposed Amendments to the Commercial Harbor Craft rule to be heard on June 24-24, 2010

Ron Tan

tanr@sbcapcd.org

Santa Barbara County APCD

805-961-8812

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/chc10/6-06-22-10\_\_ltr\_2\_board\_clerk\_carb\_re\_comm\_harbor\_craft\_-\_ca\_waters.pdf'

Original File Name: 06-22-10 ltr 2 Board Clerk CARB re Comm Harbor Craft - CA waters.pdf

Date and Time Comment Was Submitted: 2010-06-23 08:33:09

No Duplicates.

## **Comment 7 for Commercial Harbor Craft (chc10) - 45 Day.**

First Name: chad

Last Name: carpenter

Email Address: chadc@restaite.net

Affiliation:

Subject: Commercial Harbor Craft low use hour proposal

Comment:

Please take into consideration the attached comments to rule change.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/chc10/7-response\_to\_low\_use\_hours.doc'

Original File Name: Response to Low Use Hours.doc

Date and Time Comment Was Submitted: 2010-06-23 11:41:53

No Duplicates.

## **Comment 8 for Commercial Harbor Craft (chc10) - 45 Day.**

First Name: John

Last Name: Kaltenstein

Email Address: JKaltenstein@foe.org

Affiliation:

Subject: CHC10

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/chc10/8-kaltenstein.pdf'

Original File Name: Kaltenstein.pdf

Date and Time Comment Was Submitted: 2010-06-23 13:36:36

No Duplicates.

**There are no comments posted to Commercial Harbor Craft (chc10) that were presented during the Board Hearing at this time.**