



Guidance for Portable Equipment

April 2023

Introduction

Portable equipment are potential sources of emissions and therefore are generally subject to reporting under Annual Emissions Reporting Program (AER). Examples of portable equipment are portable gasoline or diesel engines used as generator sets, to pump water or to power equipment such as compressors and woodchippers.¹

Some portable equipment qualify for the California Air Resources Board (CARB) Statewide Portable Equipment Registration Program (PERP). Equipment registered under PERP are not subject to local district permitting requirements, including those from South Coast AQMD, and cannot reside at the same location for more than 12 months.

Other portable equipment may be permitted by South Coast AQMD. These can fall within two categories: portable equipment used exclusively at a facility and is therefore required to be permitted at the facility, and portable equipment permitted under ‘Various Locations’ permits. ‘Various Locations’ permits are issued to the owner or operator of the equipment, such as a rental yard. This equipment cannot reside at the same location for more than 12 months.

Lastly, some portable equipment is not subject to South Coast AQMD permitting requirements, as they meet exemption criteria under South Coast AQMD Rule 219. This equipment is typically powered by engines smaller than 50 bhp.

This document describes reporting requirements for portable equipment along with the limited exemptions to the reporting requirements for facilities subject to CARB’s Criteria and Toxics Reporting Regulation (CTR). This document also provides general instructions on aggregating portable equipment for reporting purposes.

Facilities Subject to Rule 301 and/or AB 2588 Reporting Requirements

These facilities are required to report emissions from all portable equipment described above, including equipment that is exempt from permitting requirements. Portable equipment operated by contractors at the facility, or equipment rented by the facility, must also be reported by the facility.

Some owner/operators of ‘Various Locations’ equipment have total emissions from all ‘Various Locations’ equipment which exceeds Rule 301 thresholds. In such cases, the owner/operator of the ‘Various Locations’ equipment is subject to reporting under the Facility ID for which the various locations equipment is permitted.

Emissions resulting from PERP equipment are not subject to emission fees under Rule 301.

Facilities Classified as Core CTR

Core CTR facilities consist of greenhouse gas reporters, facilities with criteria emissions greater than 250 tons per year and elevated prioritization toxics facility. All Core CTR facilities are also subject to emission reporting under Rule 301 and thus there are no exemptions for reporting portable equipment for this category.

Facilities Classified as CTR Additional Applicability

Additional Applicability Facility in CTR are those facilities identified in Table A-3 of CTR Section 93401(a)(4). Facilities that fall under the CTR Additional Applicability category only, and not subject to

¹ See <http://www.aqmd.gov/home/permits/equipment-registration/perp/portable-engines>

Rule 301 or AB 2588 reporting requirements, are not required to report emissions from any portable equipment.

Facilities Qualifying for CTR Abbreviated Reporting

Facilities that qualify for CTR Abbreviated Reporting are not required to report emissions from any portable equipment.

General Instructions for Aggregating Portable Equipment for Reporting

For ease of reporting, some facilities may wish to report aggregate emissions from portable equipment. This is allowable, with certain conditions:

- Permitted equipment operated at the location identified on the permit may not be aggregated. The aggregated portable equipment must all qualify to use the same emission factors. For example, different emission factors may apply for different ranges of burner capacity (e.g., < 10 MMBtu, 10 -100 MMBtu, > 100 MMBtu). In such instances, equipment in different burner capacities may not be aggregated. While aggregation of identical pieces of unpermitted portable equipment and aggregation of identical pieces of permitted portable equipment are both allowed, no aggregation between permitted and unpermitted portable equipment is allowed.

Other sources available to assist reports are:

- The AER Help and Support manual found on the AER website (<http://www.aqmd.gov/aer>).
- The Guidelines on CTR Core Facility Reporting found on the AER website have details on reporting PERP equipment (<http://www.aqmd.gov/aer>).

Avoid Double Counting Emissions

When preparing an AER, reporters should avoid double counting of emissions. AERs should only contain emissions that are generated at their facilities. If a facility is required to report emissions from portable equipment in an AER, usages and throughputs should be documented for portable equipment used at the that facility. For example, an aggregate facility with an address listed as 'Various Locations' generates criteria pollutant emissions that exceed Rule 301 thresholds. That facility rents a permitted portable crusher to a large bridge project for seven months, then rents the same portable crusher for four months to a CTR Core Facility. When reporting the emissions for their crusher in their AER, the aggregate facility should not include the emissions that occurred at the CTR Core facility, since those emissions will be reported in the AER for the CTR Core facility.

Geolocation

Facilities Not Classified as Core CTR

Facilities not classified as Core CTR are not required to report emission release points for each process. These facilities are only required to report the geolocation of the facility. If the facility address is NOT listed as 'Various Locations', then the permitted address should be used. If the facility address is listed as 'Various Locations', then the location where the equipment is used should be used as the geolocation of the facility. If the equipment is used at multiple locations, the facility geolocation where most of the emissions occurred should be used. If this is not known, then the geolocation of the facility should be where the equipment is stored.

Facilities Classified as Core CTR

Facilities classified as Core CTR are required to report both the geolocation of the facility and the geolocation of the process release points. Reporters should report the geolocation of where the emissions are generated. If the equipment is used at multiple locations, the geolocation where most of the emissions occurred should be used. If this is not known, then the geolocation of where the equipment is stored may be used.

Examples for Reporting Applicability for Portable Equipment

Example 1

A rental yard is the owner of portable equipment which is permitted by South Coast AQMD under Various Locations permits. The rental yard has its own Facility ID, under which the ‘Various Locations’ equipment is permitted. The facility renting the equipment does not need to report emissions as total emissions are below the Rule 301 threshold. The rental yard rents a storage tank degassing equipment to a refinery during the reporting year. The refinery is required to report the emissions associated with the storage tank degassing equipment for that reporting year, since it is already subject to reporting requirements under Rule 301.

Example 2

The same rental yard facility described above rents several portable generator sets (gensets) that are diesel-powered, permitted under ‘Various Locations’ permits. The facility renting the equipment does not need to report emissions as total emissions are below the Rule 301 thresholds.

Example 3

An aggregate facility with an address listed as various locations uses equipment to support freeway a project. The total emissions are greater than Rule 301 thresholds; therefore, annual emission must be reported. The geolocation of the facility should be listed as where the emissions were released at the construction site.

Example 4

A nickel-plating facility has tanks permitted by South Coast AQMD. The total criteria pollutant emissions are below the Rule 301 thresholds. The facility is also not an AB 2588 facility nor a Core CTR facility. However, the facility has permitted processes meeting the descriptions of Sector No. 2 in Table A-3 of CTR and therefore is a CTR Additional Applicability Facility. The facility rented a diesel-powered pump during the reporting year. This pump is registered under PERP. Since the facility is subject to CTR Additional Applicability only, the emissions from the PERP equipment do not have to be reported.

Example 5

A city has a ‘Various Locations’ PERP registered portable generator and a South Coast AQMD permitted portable generator that it uses at three sites. The first site is subject to Core CTR requirements, the second site is only subject to Rule 301 requirements, and the last site is only subject to CTR Additional Applicability Facility requirements. The emissions from the PERP generator and the permitted portable generator released at the Core CTR facility need to be reported in the AER for the Core CTR facility. The emissions from the PERP generator released at the Rule 301 facility are not required to be reported by Rule 301, so only the emissions from permitted portable generator released at the facility needs to be reported in their AER. Only permitted emissions are required to be reported by the facility only subject to CTR Additional Applicability Facility requirements; therefore, neither the PERP generator nor the permitted portable generator emissions released at this facility need to be reported.