

Written Submitted Comments:

From Dave Armstrong, LLNL: (submitted February 28, 2012)

As follow-up to the Workshop on February 22, 2012, the following are comments on the draft changes to Regs 2-1 and 2-2:

1. The proposed changes to Reg 2-1-220 intended to change the definition of “Portable,” to be consistent with the State definition. However, the draft changes do not include the full State definition of “portable.” Specifically, to be consistent with the State definition, it should include the following sentence: “**The period during which the engine or equipment unit is maintained at a storage facility shall be excluded from the residency time determination.**” (Note: I made this comment at the BAAQMD Workshop on Feb 22, and Greg Stone commented that this change should be able to be made.)

2. Reg 2-2-302.2.1 describes the conditions for which a facility is required to “Reimburse the Small Facility Bank for any cumulative increase for which offsets were previously provided from the Small Facility Banking Account...”

This requirement assumes that all of the prior permits issued resulted in real, permanent increases in emissions, which may not be the case. Therefore, the wording of this condition should be modified with the words: “, **except for increases that were subsequently nullified by permit cancellation or permit modification.**” (Note: R&D facilities are at a disadvantage because they require permits for new activities that may not be sustained over time.)

3. Reg 2-1-113.2.5 provides an exemption for architectural and industrial maintenance **coating**. This exemption should include the use of **adhesives and sealants** for the same purposes. (Note: I have made this comment in prior workshops over the years, to correct an old “inconsistency” in the Regs.)

Thanks for the opportunity to comment,
Dave Armstrong
LLNL

