Training Seminar: 2010 Off-road Diesel Vehicle Regulation for Large Fleets

February 10, 2010
Sacramento, CA

California Environmental Protection Agency
Air Resources Board

Outline

• Review 2010 Requirements
• Reduced Horsepower and Activity Credit
• 2010 Compliance Summary
• BACT Changes
• Fleet Average Calculator
• Retrofit Visibility and Exemptions

Review 2010 Requirements

Regulation Status

• Off-road regulation not delayed
• July 2009 amendments grant significant relief to fleets impacted by recession
  – Two year credit if activity or fleet size down >= 32%
• Updates to Board in April and July 2010
Current Requirements

- Reporting and Labeling
- Cannot Buy Tier 0 Vehicles
  - After March 1, 2010, if a large fleet does not meet fleet averages, must be Tier 2 or better
- Idling Restriction and Idling Policy
- Disclosure with Vehicle Sales

Regulation Background

By March 1, 2010, large fleets must:

- Meet the fleet average for NOx, or
- Turn over 8% of fleet horsepower (or use credits)

- Meet the fleet average for PM
  - Retrofit 20% of fleet horsepower (or use credits)

Fleet Averages

Calculated in DOORS, fleet average calculators, alternate compliance planning tools

<table>
<thead>
<tr>
<th>Target Year</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx Target</td>
<td>6.6</td>
<td>6.4</td>
<td>6.1</td>
<td>5.7</td>
<td>6.6</td>
</tr>
<tr>
<td>PM Target</td>
<td>0.00</td>
<td>0.27</td>
<td>0.27</td>
<td>0.22</td>
<td>0.22</td>
</tr>
<tr>
<td>PM Average</td>
<td>0.37</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

BACT: NOx and PM

NOx BACT: Turnover

- Sell / Retire (or Replace)
- Repower
- Verified NOx retrofits,
  - Designate permanent low use

PM BACT

- Level 2 or 3 retrofits (currently all verified retrofits are level 3)
- Tier 0 retirements in shrinking fleet
Additional Provisions

- Alternative fuels
- Electric vehicles
- Delay Tier 1 turnover to 2013
- Yearly low-use designation
- Specialty vehicles
- Adding vehicle requirements

Reduced Horsepower

- Reduced Horsepower Credit
  - If total fleet horsepower reduced from March 1, 2006, to March 1, 2010, credit is granted for the difference.

  **Example:** A fleet has 10,000 horsepower on March 1, 2006, and has 7,000 horsepower on March 1, 2010.
  \[10,000 - 7,000 = 3,000 \text{ Hp Credit}\]

- Reduced Horsepower Credit
  - Credit applied to both NOx (turnover requirements) and PM (retrofit requirements)
  - Credit does not expire (lasts until used)
  - Age or Tier of vehicles retired does not affect credit
Reporting Reduced Horsepower

Include all vehicles the fleet owned since March 1, 2006, in the fleet report in DOORS.

Reduced Activity

• Compare fleet activity from the period January 1, 2007 to December 31, 2007, to the period March 1, 2009 to February 28, 2010.

Example: My fleet worked 20 percent less between March 2009 to February 2010 than I did in all of 2007. My fleet on July 1, 2007, was 10,000 hp. I get

\[20\% \times 10,000 \text{ Hp} = 2,000 \text{ Hp Credit}\]
Reduced Activity Credit

- Credit applied to both NOx (turnover requirements) and PM (retrofit requirements)
- Good for 2010 and 2011 requirements only (unused credit expires if not used in 2011).
- Percent reduction in activity multiplied by July 1, 2007, horsepower

Uncapped Reduced Activity Indicators

- Vehicle hours
  - Records for 95% of the fleet or more (by Hp)
  - Weighted by horsepower
- Off-road Diesel Fuel Use
  - Red dye diesel use
  - May include regular diesel if claimed for tax credit
- Operating Engineer Hours Paid

Capped Reduced Activity Indicators

Records capped at 20% credit:
- Total employment
  - Records of overall employment by the agency or company
- Production Information
  - Tons mined, flights ran, acres cleared, etc.
- Business Revenue
Reporting Reduced Activity

**Three Steps**
1. Online in DOORS
2. Complete ARB forms
3. Mail in ARB form with fleet records

http://www.arb.ca.gov/msprog/ordiesel/activity.htm

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Reporting Reduced Activity: Online

**Hours of operation:**

<table>
<thead>
<tr>
<th>Model</th>
<th>MY</th>
<th>2007 Hours</th>
<th>2010 Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>350G</td>
<td>2002</td>
<td>476</td>
<td>351</td>
</tr>
<tr>
<td>456</td>
<td>2009</td>
<td>176</td>
<td>158</td>
</tr>
<tr>
<td>140G</td>
<td>1981</td>
<td>190</td>
<td>205</td>
</tr>
</tbody>
</table>

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Reporting Reduced Activity Forms

**Alternate Indicators**

Uncapped or Capped

- Off-road Diesel Fuel Use
- Total Vehicle
- Operator Hours Paid
- Revenue
- Total Number of employees
- Production
- Other (Specify Below)

Complete ARB form, and include fleet records (paper and/or electronic)

http://www.arb.ca.gov/msprog/ordiesel/activity.htm
What Fleet Records are Required?

- Hour meter logs, vehicle tracking software
- Payroll records, tax records for employees
- Fuel receipts, tax records for fuel
- Revenue from tax receipts
- Shipping records for goods / services
- Production / services records

Low Use Vehicles

Low Use Vehicles Must Choose:

- **Year by year**
  - Drop out of fleet horsepower / averages
  - Enter hours for 12 months prior to March 1, 2010 (or 36 months prior)
  - No credits to PM or NOx, just lower requirements

- **Designate permanent low use**
  - Vehicle will always be low use in the future
  - Enter current hour meter (but not previous)
  - Credit towards NOx (turnover credit)

Reporting Low Use
Inputting Hour Meter Records

http://www.arb.ca.gov/msprog/ordiesel/faq/faqlowuse.pdf

Compliance Summary

• Official status of the fleet vs. 2010 requirements
• Fleet averages, credits, size, dates
• 2010 only, no future dates
• Released to calculate a single DOORS ID compliance status initially
• Subfleets included in the future

2010 Compliance Summary

Fleet is not 2010 Compliant

Fleet must: Turnover 5.778 Hp or meet the NOx fleet average.

Summary: compliant or not?
Brief summary of outstanding requirements (if any)
Compliance: NOx

<table>
<thead>
<tr>
<th>2010 NOx Requirements:</th>
<th>Met</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nox Fleet Average:</td>
<td>Met</td>
</tr>
<tr>
<td>Nox BACT Requirements:</td>
<td>NA</td>
</tr>
<tr>
<td>Required BACT Turnover:</td>
<td>2,112 Hp</td>
</tr>
<tr>
<td>(8% of Fleet Horsepower)</td>
<td></td>
</tr>
<tr>
<td>Current Turnover Credit:</td>
<td>0 Hp</td>
</tr>
</tbody>
</table>

NOx BACT Credits

<table>
<thead>
<tr>
<th>Nox Credit</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2006-2010 Retirement:</td>
<td>391</td>
</tr>
<tr>
<td>Reduced Activity:</td>
<td>6,401</td>
</tr>
<tr>
<td>Early Replacement:</td>
<td>0</td>
</tr>
<tr>
<td>Repowers</td>
<td>4,931</td>
</tr>
<tr>
<td>2009-2010 Turnover:</td>
<td>0</td>
</tr>
<tr>
<td>Total:</td>
<td>11,724</td>
</tr>
</tbody>
</table>

Fleets Not in Compliance

1. Check credits / dates reported in DOORS
2. Double check credits reported in DOORS
3. Determine distance from fleet averages
4. Determine required turnover/retrofit requirements

Fleets Not in Compliance

5. NOx BACT: Turnover
   - Tier 0 vehicles
     - Retire / Replace / Repower
     - Designate permanent low use
     - NOx retrofit by March 1
   - No turnover required for Tier 1 or better until after March 1, 2012
Fleets Not in Compliance

6. PM BACT: Retrofit
   - Install retrofits by March 1, 2010
   - Retire any vehicles to reduce March 1, 2010 total hp from March 1, 2006
   - Retire Tier 0s to reduce March 1, 2010 total hp from March 1, 2009

BACT Schedule Changes

- Amendment modifies 2011 to 2013 requirements. Effectively:
  - 2011: Reduce requirements by 40%
  - 2012: Reduce requirements by 40%
  - 2013: Increase requirements by 80%

Turnover Requirements
Retrofit Requirements

- 20% in 2010
- 12% in 2011
- 12% in 2012
- 36% in 2013
- 20% in 2014

BACT Changes: Exemptions

- Fleets meeting the fleet averages in 2011 or 2012 and medium fleets will not have their overall requirements increased.
- Example:
  - A fleet that meets the fleet averages in 2012 will not benefit from the amendments, and therefore would not have increased BACT requirements in 2013.

Fleet Average Calculator

- Compliance planning in Excel based tool
- Independent from DOORS

Compliance Scenarios

- Enter a number of different scenarios
- Determine the best / easiest way to comply
Extended Compliance Planning

• Plan for 2011 to 2020 compliance requirements

<table>
<thead>
<tr>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2014...</th>
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Retrofit Visibility

Interim Visibility Policy

• The regulation exempts vehicles from retrofitting where a retrofit would be unsafe
• CalOSHA is considering a standard for retrofit visibility (late 2010 or 2011)
• To prevent installs now that would later violate CalOSHA standards, ARB will exempt vehicles that cannot be retrofit without impacting visibility

2010 Retrofit Requirements

• For 2010 requirements, select vehicles to retrofit where the retrofit does not block operator visibility
• If no vehicles in the fleet can be retrofit without blocking operator visibility, the fleet will be temporarily exempt from retrofit requirements
Operator Visibility

- Visibility defined by an operator of average height and weight, looking in any direction around a vehicle
- Retrofit installation should not block their view of surroundings in any direction

Installations that Create Masking

Installations that Create Masking 2

Installations without Masking

http://www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm
Installations without Masking 2

Determining Visibility

- For cases that are unclear, use the guide at www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm

Using the Operator Eye-point

The guide provides a consistent, repeatable method to test a vehicle before retrofitting.

1. Center the seat
2. Define seat compression
3. Use standard seated height

Claiming an Exemption

- Follow exemption guide and application
- Submit paperwork to ARB

http://www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm
Exemption Process

- Exemption will be reviewed by retrofit manufacturers / installers
- Vehicles that could be retrofit will not be exempt
- Vehicles that cannot be retrofit will be posted (multiple fleets will not all have to submit an exemption request)

Information and Contacts

Off-road Diesel Homepage: Reporting, Fleet Average Calculator, Training Information
www.arb.ca.gov/ordiesel

Knowledge Center (FAQs, Advisories)
www.arb.ca.gov/msprog/ordiesel/knowcenter.htm

Help Line: (877) 59-DOORS
doors@arb.ca.gov