In-Use Off-Road Diesel Vehicle Regulation

ARB Off-road Implementation Section
California Environmental Protection Agency
Air Resources Board

Outline

- Need for Emissions Reductions
- Exhaust Retrofit Technologies
- Off-Road Regulation Requirements
- Off-Road Compliance Steps and Examples
- Technology Demonstrations
- Funding Programs
- SOON Program
- Compliance Assistance and Outreach
- DOORS
- Contacts

Need for Emission Reductions

- Must reduce Diesel Particulate Matter (PM)
  - 70% of known cancer risk from all air toxics
  - Thousands of deaths per year in California (heart disease and cancer)
- Must reduce oxides of nitrogen (NOx)
  - Ozone and secondary PM formation
  - Ozone is a serious lung irritant, associated with premature deaths and asthma
- Attain ozone and PM standards
  - Could lose federal highway funds if California cannot show that standards will be attained by deadline
Cumulative Health Benefits

- **4,000 fewer premature deaths**
- 110,000 fewer cases of asthma and lower respiratory symptoms
- 680,000 work loss days
- 3,900,000 restricted activity days
- $18 - $26 billion in avoided health costs
- 2020:
  - 32% reduction in NOx
  - 74% reduction in diesel PM
What is an Exhaust Retrofit?

- Systems that reduce specific pollutants
  - Can control one or more pollutants such as PM, NOx, or both
  - Installed on an in-use vehicle
- Systems include, but are not limited to:
  - Diesel particulate filters (DPFs)
  - Flow through filters (FTFs)
  - Diesel Oxidation Catalysts (DOCs)
  - Selective Catalytic Reduction (SCR)

Exhaust Retrofits Cont.

- Also commonly referred to as retrofits, filters, scrubbers
- “Repowers” are not considered exhaust retrofits
- Once a device is verified with ARB, it becomes a verified diesel emission control strategy (VDECS)

ARB Verification of Retrofits

- Ensures emission reductions and durability
- Provides end user warranty
  - 4-5 years and 2,600-4,200 operating hours
  - A current list of verified devices is located at: www.arb.ca.gov/diesel/verdev/verdev.htm

<table>
<thead>
<tr>
<th>Level</th>
<th>PM Reduction</th>
<th>Typical Device</th>
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<tbody>
<tr>
<td>1*</td>
<td>≥ 25%</td>
<td>Oxidation catalyst</td>
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<tr>
<td>2</td>
<td>≥ 50%</td>
<td>Flow-thru filter</td>
</tr>
<tr>
<td>3</td>
<td>≥ 85%</td>
<td>Particulate filter</td>
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</table>

* - No credit for Level 1 in off-road regulation

ARB Verification Cont.

- VDECS that reduce NOx are not given a “Level”
  - NOx VDECS are currently verified by % NOx reduction
  - Soon will be verified with Mark 1 to Mark 5
- Highest Level VDECS
  - Required by off-road regulation
  - Achieve maximum PM reductions
  - Do not take into account NOx reductions
  - Most commonly are DPFs
How Does a Diesel Particulate Filter (DPF) Work?

• The filter is positioned in the exhaust stream to trap or collect a significant fraction of the particulate emissions while allowing the exhaust gases to pass through the system.

DPF Information Cont.

• The volume of PM generated by a diesel engine will fill up (load) a DPF over time; thus the trapped PM must be burned off or "regenerated" periodically
  – Active regeneration: Needs heat to regenerate – electricity or burning additional fuel
  – Passive regeneration: No outside energy required
• DPF requires periodic cleaning of ash
  – Build-up of ash occurs due to regeneration
  – Ash cleaning required ~ yearly depending on usage

Verified Level 3 Off-road Devices
(as of 12/23/08)

<table>
<thead>
<tr>
<th>Product</th>
<th>Applicability</th>
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<tbody>
<tr>
<td>Caterpillar DPF</td>
<td>Many 1996-2008 model year engines; 175-600 hp, passive</td>
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<tr>
<td>Cleaire Horizon</td>
<td>Conditionally verified, active plug-in</td>
</tr>
<tr>
<td>Cleaire Lonestar</td>
<td>Conditionally verified for many 1996 – 2009, passive + 40% NOX reduction</td>
</tr>
<tr>
<td>DCL MINE-X Sootfilter</td>
<td>Conditionally verified for 1996-2008 model year, rubber tired</td>
</tr>
<tr>
<td>Engine Control System Combfilter</td>
<td>2007 or older, active plug-in</td>
</tr>
<tr>
<td>Engine Control Systems’ PurifilterTM</td>
<td>Conditionally verified for many 1996-2008 model years, passive</td>
</tr>
<tr>
<td>HUSS Umwelttechnik FS_MK</td>
<td>Most engines through 2007 model year, active fuel-burner</td>
</tr>
</tbody>
</table>

Verification Database

http://www.arb.ca.gov/diesel/verdev/vdb/disclaimer.php

Search by:
VDECS, Engine Family, or Manufacturer / Model Year / Displacement

4 Results Matching VCP7.0RZDARB

<table>
<thead>
<tr>
<th>YEAR</th>
<th>ENG MFR</th>
<th>ENG FAMILY</th>
<th>DSP</th>
<th>DEVICE MFR</th>
<th>DEVICE NAME</th>
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<td>Caterpillar</td>
<td>VCP7.0RZDARB</td>
<td>7</td>
<td>Caterpillar</td>
<td>Diesel Particulate Filter</td>
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<tr>
<td>1997</td>
<td>Caterpillar</td>
<td>VCP7.0RZDARB</td>
<td>7</td>
<td>Caterpillar</td>
<td>DPF</td>
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<td>1997</td>
<td>Caterpillar</td>
<td>VCP7.0RZDARB</td>
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<td>Engine Control Systems</td>
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<td>1997</td>
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<td>VCP7.0RZDARB</td>
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<td>HUSS</td>
<td>FS_MK</td>
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</table>
Off-Road Regulation Requirements

Applicability

Regulation applies to any person, business, or government agency who owns or operates any diesel-fueled or alternative diesel fueled off-road vehicle horsepower within California

- Applies to vehicles $\geq 25$ horsepower
- Applies to the “drive” engine only
- Includes out-of-state vehicles brought into California
- Excludes vehicles primarily used (> 50% time) for agricultural operations
- Excludes vehicles used for personal use

Applicability Cont.

- What is considered an off-road vehicle?
  - Vehicles that were intended to be used off-road
  - Designed for off-road use and have off-road engines
  - Cannot be registered to drive safely on-road
  - A workover rig
  - Two engine cranes
- Excludes vehicles designed to operate on-road regardless of use

Requirements Vary by Fleet Size

<table>
<thead>
<tr>
<th>Fleet Size Category</th>
<th>Description</th>
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<tbody>
<tr>
<td>Small</td>
<td>Fleet with $\leq 2,500$ hp, or Municipal fleet in low population county</td>
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<tr>
<td>Medium</td>
<td>Fleet with $2,501$ to $5,000$ hp</td>
</tr>
<tr>
<td>Large</td>
<td>Fleet with more than $5,000$ hp, or State or Federal Government fleet</td>
</tr>
</tbody>
</table>
5 Minute Limit on Idling

• Requirement effective June 15, 2008
• 5 minute idling limit for off-road vehicles
• Exemptions from this requirement:
  – idling when queuing
  – idling to verify that the vehicle is in safe operating condition
  – idling for testing, servicing, repairing or diagnostic purposes
  – idling necessary to accomplish work for which the vehicle was designed (such as operating a crane)
  – idling required to bring the machine system to operating temperature
  – idling necessary to ensure safe operation of the vehicle

Idling Limit Cont.

• Can apply to ARB Executive Officer to idle > 5 min. if reason not covered in exemptions
• Enforcement of 5 min. idling
  – Field audits began September 15, 2008
• Fines
  – First time offense: $300 per violation
  – Subsequent offenses: Can be $1,000 to $10,000 per violation

Disclosure of Applicability

• Disclosure of regulation applicability:
  – Persons selling in California to California buyer
  – Disclosure records must be kept for 3 years
  – Disclosure not required for manufacturers selling to dealers
  – Language must be included on the bill of sale, invoice, or price quote that is signed by buyer

Disclosure of Applicability Cont.

“When operated in California, any off-road diesel vehicle may be subject to the California Air Resources Board In-Use Off-road Diesel Vehicle Regulation. It therefore could be subject to retrofit or accelerated turnover requirements to reduce emissions of air pollutants. For more information, please visit the California Air Resources Board website at http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm”
Disclosure of Applicability Cont.

- Enforcement of disclosure provision
  - Field audits began September 15, 2008
- Fines
  - First time offense: $500 per violation
  - Subsequent offenses: $1,000 to $10,000 per violation

Beginning March 1, 2009

- Written 5 minute idling policy should be established by fleet owner
  - Required for medium and large fleets
  - Must make idling policy available to all vehicle operators in fleet
- Can no longer add Tier 0 vehicles to fleet

Initial Reporting

- Initial reporting varies by fleet size
  - Fleets must report their fleet information as it was on March 1, 2009
  - Fleets must report their information to ARB by their designated reporting date
  - Reporting is free, no cost to fleets to register vehicles with ARB

<table>
<thead>
<tr>
<th>Fleet Size Category</th>
<th>Initial Reporting Date</th>
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<tbody>
<tr>
<td>Large</td>
<td>April 1, 2009</td>
</tr>
<tr>
<td>Medium</td>
<td>June 1, 2009</td>
</tr>
<tr>
<td>Small</td>
<td>August 1, 2009</td>
</tr>
</tbody>
</table>

Vehicle Labeling

- All vehicles subject to the regulation must be labeled
  - ARB assigns Equipment Identification Number (EIN) after initial reporting period; label stays with vehicle for life
  - Fleets must label vehicles within 30 days of receiving EIN; labels not issued by ARB
  - Label dimensions/specifications found in section 2449(f)
Compliance Requirements

- Compliance requirements must be met by March 1 of each year

<table>
<thead>
<tr>
<th>Fleet Size Category</th>
<th>Dates and Requirements</th>
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<tbody>
<tr>
<td>Large*</td>
<td>2010-2020 PM and NOx</td>
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<tr>
<td>Medium*</td>
<td>2013-2020 PM and NOx</td>
</tr>
<tr>
<td>Small</td>
<td>2015-2025 PM only</td>
</tr>
</tbody>
</table>

* Same requirements for large and medium fleets, only initial compliance date varies.

NOx Requirements

Two ways to meet the NOx requirements (the lesser of the two can be done):

- NOx fleet average targets requirements
  - Meet NOx emissions targets set in regulation by any means
  - or

- Best Available Control Technology (BACT) requirements:
  - Turn over engines at a rate of 8% of total fleet horsepower per year (after 2015, the 8% turnover rate increases to 10%)

NOx Emission Factors *

<table>
<thead>
<tr>
<th>NOx Emissions Factors by Horsepower and Year (g/bhp-hr)</th>
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<tbody>
<tr>
<td>Horsepower Groups</td>
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<tr>
<td>Year</td>
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<tr>
<td>------</td>
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<tr>
<td>1900</td>
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<td>1969</td>
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<td>2000</td>
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<td>2001</td>
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<tr>
<td>2002</td>
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</table>

* Only partial chart shown

NOx Fleet Average Calculation Example

Example fleet of 3 vehicles:
Vehicle 1: 1996, 100 hp, NOx EF = 9.3
Vehicle 2: 2000, 200 hp, NOx EF = 6.9
Vehicle 3: 2002, 300 hp, NOx EF = 4.2

NOx Fleet Average

$$= \frac{(9.3\times100)+(6.9\times200)+(4.2\times300)}{(100+200+300)}$$

$$= 6.0$$
NOx Fleet Average Emission Targets

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<td>25-44 hp</td>
<td>5.8</td>
<td>5.6</td>
<td>5.3</td>
<td>5.1</td>
<td>4.9</td>
<td>4.6</td>
<td>4.4</td>
<td>4.2</td>
<td>4.0</td>
<td>3.7</td>
<td>3.5</td>
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<tr>
<td>50-74 hp</td>
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<td>6.2</td>
<td>5.8</td>
<td>5.5</td>
<td>5.1</td>
<td>4.8</td>
<td>4.4</td>
<td>4.1</td>
<td>3.7</td>
<td>3.4</td>
<td>3.2</td>
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<td>7.1</td>
<td>6.7</td>
<td>6.2</td>
<td>5.7</td>
<td>5.2</td>
<td>4.8</td>
<td>4.3</td>
<td>3.8</td>
<td>3.3</td>
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<td>100-174 hp</td>
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<td>5.1</td>
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<td>3.8</td>
<td>3.4</td>
<td>3.0</td>
<td>2.6</td>
<td>2.2</td>
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<tr>
<td>175-299 hp</td>
<td>9.2</td>
<td>9.8</td>
<td>9.3</td>
<td>4.9</td>
<td>4.5</td>
<td>4.1</td>
<td>3.6</td>
<td>3.2</td>
<td>2.8</td>
<td>2.3</td>
<td>1.9</td>
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<td>300-599 hp</td>
<td>9.9</td>
<td>5.5</td>
<td>5.1</td>
<td>4.7</td>
<td>4.3</td>
<td>3.9</td>
<td>3.5</td>
<td>3.1</td>
<td>2.7</td>
<td>2.3</td>
<td>1.9</td>
</tr>
<tr>
<td>600-750 hp</td>
<td>6.1</td>
<td>5.6</td>
<td>5.2</td>
<td>4.8</td>
<td>4.4</td>
<td>4.0</td>
<td>3.6</td>
<td>3.2</td>
<td>2.7</td>
<td>2.3</td>
<td>1.9</td>
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<tr>
<td>Greater than 750 hp</td>
<td>7.2</td>
<td>6.8</td>
<td>6.5</td>
<td>6.1</td>
<td>5.7</td>
<td>5.3</td>
<td>4.9</td>
<td>4.5</td>
<td>4.1</td>
<td>3.8</td>
<td>3.4</td>
</tr>
</tbody>
</table>

* Targets in 2010, 2011, and 2012 are for LARGE fleets only

Vehicle 1 = 100 hp, NOx 2010 target is 6.4
Vehicle 2 = 200 hp, NOx 2010 target is 6.2
Vehicle 3 = 300 hp, NOx 2010 target is 5.9

NOx Fleet Average Target:

\[
\text{NOx Fleet Average Target} = \frac{(6.4\times100)+(6.2\times200)+(5.9\times300)}{(100+200+300)} = 6.1
\]

Compare Target with Average

NOx fleet average = 6.0
NOx fleet average 2010 target = 6.1

6.0 < 6.1

Since NOx fleet average is less than the NOx fleet target set for 2010, the fleet is in compliance

NOx BACT Requirements

- Must turn over Tier 0 and Tier 1 (without PM standard) vehicles first
- Compliance options for NOx BACT turnover requirements:
  - Replace older vehicles with new or used vehicles
  - Replace diesel vehicles with electric or alternative fuel vehicles
  - Repower older engines with a Tier 2 or higher engines
  - Retire vehicles from fleet
  - Designate vehicles as low use (used < 100 hours per year)
  - Install NOx verified diesel emission control strategy (VDECS)
Special Provisions for Attainment Counties

- Fleets captive to listed attainment counties
  - Do not need to meet turnover requirements or NOx fleet averages
- These counties are always in: they cannot fall out of this provision, and other counties cannot come in
- Fleets can travel within multiple attainment counties

Attainment Counties

Attainment counties include:
Alpine, Colusa, Del Norte, Glenn, Humboldt, Lake, Lassen, Mendocino, Modoc, Monterey, Plumas, San Benito, San Luis Obispo, Santa Barbara, Santa Cruz, Shasta, Sierra, Siskiyou, Trinity, Tehama, and Yuba

PM Requirements

Two ways to meet the PM requirements (the lesser of the two can be done):

- PM fleet average targets requirements
  - Meet PM emissions targets set in regulation by any means
  or
- Best Available Control Technology (BACT) requirements:
  - Install verified diesel emission control strategy VDECS (also referred to as PM retrofits) on 20% of total fleet horsepower per year

PM Fleet Average Calculation

- Same procedure as for NOx
- Calculate fleet average
  - Read off emission factor for each engine
  - Weight by hp
- Calculate target for each model year
  - Read off target for each engine
  - Weight by hp
- Fleet average calculator or DOORS will do calculations for you
PM BACT Requirements

- Compliance options for PM BACT retrofit requirements:
  - Install PM VDECS
- Retirement of Tier 0s for a fleet decreasing in horsepower
  - If a fleet is “shrinking” from the previous year, the Tier 0 horsepower retired (and not replaced) from the fleet can count towards PM BACT compliance
  - Example: If a fleet retires 20% Tier 0 vehicles, both the PM and NOx BACT requirements are fulfilled

Annual Compliance Process

Large and Medium Fleets: NOx* and PM Requirements

- Either meet NOx target or do 8% or 10% turnover
- Either meet PM target or do 20% retrofits
- Done for year

Small Fleets: PM Requirements ONLY

- Either meet PM target or do 20% retrofits
- Done for year

*Captive attainment area fleets must only meet the PM requirements

NOx Final Compliance

- As of March 1, 2020 (for medium and large fleets only):
  - If 2020 NOx fleet average target is not met, the fleet must do the required NOx BACT turnover until that 2020 target is met

PM Final Compliance

- As of March 1, 2021 (for medium and large fleets), and March 1, 2026 (for small fleets):
  - All vehicles must have the highest level VDECS installed; if not, the fleet is required to install the highest level VDECS at the required PM BACT retrofit rate
  - Fleets not meeting the NOx final compliance targets must do so first
Restrictions on Adding Vehicles

- Cannot add Tier 0 vehicles after March 1, 2009
- Fleet averages met in the previous year
  - Fleets may not add vehicles that cause them to exceed the most recent targets
  - If the targets are exceeded, the fleet has 3 months to bring the fleet back into compliance
- BACT requirements met in the previous year
  - Small fleets: The vehicle must be Tier 2 or higher

Adding Vehicles Cont.

- Large/Medium fleets: The vehicle must be Tier 2 or higher and have a NOx emission factor less than or equal to the current year NOx fleet average target

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<td>50-74 hp</td>
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<td>100-174 hp</td>
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Annual Reporting

- Report any changes to the fleet from the previous year
  - Includes VDECS installed, vehicles replaced, etc.
- If final compliance target is not met, reporting must continue beyond last designated reporting date
- Reporting dates vary by fleet size:

<table>
<thead>
<tr>
<th>Fleet Size Category</th>
<th>Reporting Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small</td>
<td>August 1st: 2014-2026</td>
</tr>
<tr>
<td>Medium</td>
<td>June 1st: 2012-2021</td>
</tr>
<tr>
<td>Large</td>
<td>April 1st: 2010-2021</td>
</tr>
</tbody>
</table>

Annual Record Keeping

- Records must be kept between reporting periods:
  - Changes in the fleet since last reported
  - Newly purchased vehicles
  - Rebuilt engines
  - VDECS that have failed
  - VDECS serial numbers
  - Manufacturer delays
  - Executive Officer approvals for extensions, approval of alternative fuels, idling exceptions, etc.
- Records must be kept until the vehicle is retired, or 2030 (whichever is earlier)
Rental and Leased Vehicles

Vehicles owned by a rental or leasing company

• If rented/leased < 1 year
  – Vehicle must be included in the owner’s fleet
• If rented/leased >= 1 year
  – May be excluded from the owner’s fleet, and included in the lessee’s fleet only if written into the lease agreement
• Leases occurring before June 15, 2008
  – If “leased” as defined in California Uniform Commercial Code for at least one year, the vehicle must be included in the lessee’s fleet (not owner)

Persons who provide financing in the form of “finance leases,” as defined in California Uniform Commercial Code 10103(a)(7) do not “own” such vehicles for the purposes of this regulation

Out-of-State Fleets

• All vehicles operating in California that are owned by an out-of-state company must still comply with the regulation
  – If they report initially in 2009, they can comply with the fleet average or BACT approach
  – If they are a new fleet that enters California after March 1, 2009, they must meet the fleet average targets upon entering the state
    • Stricter than for in-state fleets
  – All vehicles brought into California must be reported to ARB within 30 days of entering the state

Early Credit Examples

• Double credit for PM retrofits extended by 10 months from March 1, 2009 to January 1, 2010
• Will allow more fleets to take advantage of this early credit provision
  – A VDECS installed early on a 200 hp vehicle would provide 400 hp credit towards the PM BACT requirements

Early Credit Examples

• Early credit for actions taken by March 1, 2009
• Single credit for repowers
  – A repower completed on a 300 hp machine would provide a 300 hp credit towards the NOx BACT requirements
  – A repower from a Tier 0 to Tier 1 will receive NOx BACT credit only until March 1, 2009
Early Credit Examples

- Credit for replacement of Tier 0s in excess of an average 8%/year turnover rate between March 1, 2006 and March 1, 2009
  - If a fleet retired/replaced its Tier 0 machines at a rate of 10% per year between 2006 and 2009, the fleet would obtain a 6% early credit towards the NOx BACT requirements
- Double credit for electric vehicles until 2016
  - If an electric vehicle is replacing a 200 hp diesel vehicle, 400 hp with a 0 NOx and 0 PM emission factor should be included in the NOx and PM fleet averages

Exemptions from Engine Turnover Requirements

- Small fleets
- Captive area attainment fleets
- Vehicles less than 10 years old
- Specialty vehicles if certain criteria are met
- Vehicles retrofit in past 6 years
- Tier 4 or Tier 4 Interim vehicles

Exemptions from Retrofit Requirements

- Engines in vehicles less than 5 years old
- Engines for which there is no retrofit available or for which one cannot be safely installed
- New engines that come with an OEM diesel particulate filter
- Engines already retrofit with the highest level VDECS at time of installation

Other Exemptions and Compliance Extensions

- Exempt from all but recordkeeping/reporting
  - Low-use vehicles
    - Operated less than 100 hours/year
  - Emergency vehicles
  - Dedicated snow removal vehicles
- Compliance extensions
  - Manufacturer delays for retrofits or new engines
  - Delay of Tier 4 interim or final vehicles
Fines for Non-Compliance

- Violation of the NOx provisions
  - Up to $1,000 per vehicle per day of non-compliance
- Violation of the PM provisions
  - Up to $10,000 per vehicle per day of non-compliance
  - If a citation is given, and the violation is not corrected, the fines can go up to $40,000 per vehicle per day of non-compliance

Off-Road Compliance
Steps and Examples

Getting Started

1. Go to the DOORS homepage or call us
   - Download from the DOORS homepage an explanation of terms, sample forms, and other material to see what information you will need to collect
   - Create a DOORS account with ARB
   - Or, call the DOORS hotline for hardcopy forms
2. Determine which vehicles are subject to the regulation
   - Dedicated agricultural and personal use vehicles are exempt
   - On-road vehicles and portable equipment are exempt

Getting Started Cont.

3. Gather vehicle data for applicable vehicles
   - Engine model year, vehicle model year, engine hp
   - Are any vehicles low use, emergency, snow-removal, or part-time agricultural?
4. Report your fleet information in DOORS
   - Call the DOORS hotline for assistance if needed
5. DOORS will determine fleet size
   - It will calculate total fleet hp, excluding any exempted vehicles from 3. above, including low use vehicles
Getting Started Cont.

6. DOORS will determine compliance requirements
   • Based on fleet size, DOORS will indicate whether the fleet must comply with the NOx requirements
   • DOORS will credit your fleet as a captive area attainment fleet if you have so indicated
   • Determine first compliance date, also based on fleet size

7. DOORS will calculate early credit
   • Add up hp credit for any early repowers, exhaust retrofits, or replacements

Getting Started Cont.

8. DOORS will calculate NOx and PM fleet averages and targets
   • Determine if the fleet is currently meeting fleet targets
   • If fleet is meeting the NOx and/or PM targets, no turnover and/or exhaust retrofitting is required

9. DOORS will determine the minimum turnover/retrofit requirements for compliance via BACT or fleet average targets
   • Fleet owner may either use a compliance plan:
     – Automatically generated by DOORS or
     – Customized

What About Turnover Exemptions?

• What if I have vehicles exempt from the BACT turnover requirements in a given year?
  – Vehicles < 10 years-old, specialty vehicles, etc.
  – Calculate the amount of turnover (in horsepower) needed, and compare to amount of horsepower with exemptions
• Cannot utilize exemption until all non-exempt hp has been turned over first

Turnover Example

• Fleet A has 10,000 total fleet hp
• 9,500 hp has turnover exemptions in 2010
• Therefore, 500 hp available for turnover
• 8% turnover required to meet NOx BACT requirements = 10,000*0.08 = 800 hp
  – Available hp for turnover = 500 hp
  – Required hp for NOx BACT turnover = 800 hp
Turnover Example Cont.

• Since available hp (500 hp) < required hp (800 hp), perform available turnover (500 hp) to meet the NOx requirements

• If available hp = 1,000 hp, only required hp (800 hp) would need to be turned over to meet NOx BACT turnover requirements

What About Retrofit Exemptions?

• What if there are no available VDECS for some/all of my fleet? What if some of my vehicles are > 5 years-old?
  – VDECS not available, vehicle < 5 years-old
  – Calculate amount of horsepower with retrofits needed, and compare to amount of horsepower with retrofit exemptions

• Cannot utilize exemption until all non-exempt hp has been retrofit

Retrofit Example

• Fleet A has 10,000 total fleet hp
• There are no retrofits available for 9,500 hp of the fleet in 2010
• Therefore, 500 hp available to retrofit
• 20% of fleet must be retrofitted to meet PM BACT requirements = 10,000 * 0.2 = 2,000 hp
  – Available hp to retrofit = 500 hp
  – Required hp to retrofit for PM BACT = 2,000 hp

Retrofit Example Cont.

• Since available hp (500 hp) < required hp (2,000 hp), perform available retrofits (500 hp) to meet the PM requirements

• If available hp = 3,000 hp, only required hp (2,000 hp) would need to be retrofit to meet PM BACT retrofit requirements
Other Considerations

- Hours in fleet average provision
  - Hours of operation can be used in the fleet average calculations
  - Beneficial for fleets with many minimal use Tier 0 vehicles
  - However, an 18% penalty is applied to fleet averages
- Use ARB Fleet Average Calculator or DOORS compliance tool to evaluate compliance options

Compliance Example
Fleet 1 - Older Earth Moving Fleet

- Fleet in 2008
  - 88 engines totaling 40,000 hp
  - Scrapers, tractors, and dozers
  - Average age of vehicles 21 yrs
  - Normal turnover 2% per year
  - Normally buys used

Fleet 1 Compliance Actions

- Continues to buy used vehicles
- 8% turnover per year (safety valve)
- 20% retrofits in first 3 years; few thereafter

Fleet 1
Engine Tier Distribution in 2020

- Majority of engines needed to comply with 2020 goals already available today
Introduction to DOORS

What is DOORS?

- Diesel Off-road On-line Reporting System
  - An on-line tool which allows you to compile and report your fleet information
  - Meets the reporting requirements
  - Retains your fleet data for future reporting
  - Includes additional features such as automated compliance planning

Outline of DOORS Discussion

- Where to find reporting forms, tools, and user guides
- Creating a DOORS account
- Submitting your fleet information
  - Directly on-line
  - Uploading with a spreadsheet
  - Hardcopy
- ARB review of your fleet – receive EINs and Certificate of Compliance
- Compliance planning and other features

Finding the Reporting Homepage

http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm
DOORS Log-in Screen

Request Online

The Diesel Off-Road On-Line Reporting System (DOORS) is the primary reporting tool for the Offroad Diesel Regulation. DOORS will allow you to create an account with ARB, download formatted Excel spreadsheets, input your information, and submit your vehicle and engine data to ARB. If you need to change your user account, you may use the DOORS Log-in screen to update your information. Type your user name and password into the blue and red boxes, respectively, and click on the "log in" button. If you need to request an account, click on the "Request an Account" button.

Click on a question below to open one of our user guides:

- How can I report with missing vehicle information?
- How do I report engine repowers?
- How can I cut and paste data into a spreadsheet?
- What if I have repeating serial numbers?
- What is the engine family name?

Common Reporting Questions

- Common Problems and Questions
  - How do I report with missing vehicle information?
  - How do I report engine repowers?
  - How can I cut and paste data into a spreadsheet?
  - What if I have repeating serial numbers?
  - What is the engine family name?

Engine Family Names?

- What is the engine family name?
  - The engine family name is an identifier assigned by the Environmental Protection Agency (EPA) to every engine verified to Tier 1 emission standards or higher.
  - Engine standards were implemented in the mid-1990s. Engines without a standard are considered Tier 0 engines, and will not have an engine family name.
  - Engine family names are generally 11 to 12 digits long for off-road diesel vehicles.

Where would I find the engine family name?

- The engine family name is usually listed on the engine label.
Additional Examples of Engine Family Labels

DOORS Reporting Homepage

DOORS – Online Forms
“enter a fleet”
“Enter Fleet Data On-line”

Owner Information
Vehicle Information

Explanation of terms

<table>
<thead>
<tr>
<th>Line</th>
<th>Veh serial num</th>
<th>Veh type</th>
<th>Manufacturer</th>
<th>Model</th>
<th>Year</th>
<th>Length (呎)</th>
<th>Compressor</th>
<th>Specialty</th>
<th>Emergency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Adding Engine Information

Explanation of terms

<table>
<thead>
<tr>
<th>Line</th>
<th>Veh serial num</th>
<th>Year</th>
<th>Eng serial num</th>
<th>Manufacturer</th>
<th>Model</th>
<th>Model year</th>
<th>Engine Family</th>
<th>Model Tow</th>
<th>Max HP</th>
<th>Displacement (呎)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Viewing Your Fleet Data

What if you already have your inventory information in a spreadsheet?

Download Excel Spreadsheet from ARB
Enter your information
Save the spreadsheet as a .PRN
Upload the files to ARB

DOORS – Excel Spreadsheets

Vehicle Information

Adding Engine Information

Viewing Your Fleet Data

DOORS – Excel Spreadsheets

What if you already have your inventory information in a spreadsheet?

Download Excel Spreadsheet from ARB
Enter your information
Save the spreadsheet as a .PRN
Upload the files to ARB
DOORS – Excel Spreadsheets

What if you already have your inventory information in a spreadsheet?

“enter a fleet” – “Upload Fleet Data”

Linked Worksheets & Macros

Change your macro security settings in Excel.

Download the Spreadsheet

you must enter your fleet information into one of the spreadsheets available here. Change the macro security settings in Excel to allow it to upload your fleet information into the proper format with the appropriate names.

Download the Spreadsheet

To do this, you will need to save and rename each worksheet twice, and then re-run the macro. On the first run, you will see the prompt “DOORS – Excel Spreadsheets” fill out your spreadsheet. This will create a new spreadsheet in the “My Documents” folder.

Download the Spreadsheet

To upload your fleet data, please follow these steps:

1. Open the Excel file.
2. Click on the “Data” tab in the ribbon.
3. Click on the “Get External Data” button.
4. Click on “From File”.
5. Select the Excel file that you want to upload.
6. Click on “Import”.
7. Select the spreadsheet that you want to upload.
8. Click on “OK”.

You can then use the data in your spreadsheet to create reports or analyze your fleet data.
DOORS – Excel Spreadsheets

Uploading

- Upload the file named upload.pdf
- Upload Owner File
- Upload Vehicle File
- Upload Engine File
- Upload Vehicle Location File

ARB Review

DOORS saves the information
Update / Review it later
Request ARB Review
- Receive EINs to label vehicles
Make changes later in online forms

Fleet Summary

<table>
<thead>
<tr>
<th>Current Diesel and Non-diesel Vehicles</th>
<th>Vehicles</th>
<th>Horsepower</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total In Fleet</td>
<td>8</td>
<td>4,765.0</td>
</tr>
<tr>
<td>(Separable vehicles, over-caps, may count as two vehicles)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Exempt from regulation and reporting</td>
<td>1</td>
<td>633.0</td>
</tr>
<tr>
<td>(existing sale, San Nicolas or San Clemente island)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Exempt but must report</td>
<td>1</td>
<td>343.0</td>
</tr>
<tr>
<td>(low-sul, emergency, snow-removal, and ag)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total in fleet average calculation</td>
<td>6</td>
<td>3,789.0</td>
</tr>
<tr>
<td>Fleet size</td>
<td>Medium</td>
<td></td>
</tr>
<tr>
<td>Non-diesel fueled engines</td>
<td>4</td>
<td>3,061.0</td>
</tr>
<tr>
<td>Non-standard certified engines</td>
<td>2</td>
<td>697.0</td>
</tr>
<tr>
<td>Standard, diesel fueled engines</td>
<td>2</td>
<td>977.0</td>
</tr>
</tbody>
</table>

Hardcopy Forms

- Similar format to the Excel Spreadsheets
- Currently under development
- Will be available from the “Reporting Forms” page directly off of the Off-road Diesel Homepage
After ARB Reviews the Data

- View EINs
- View VDECS
- Add/Ed Owner/Fleet
- Non-diesel Engine
- Non-standard Engine Certification
- Systems Replacing Diesel Vehicles
- Soon, Mayer, Other Vehicle Program
- View Fleet Summary
- Compliance Plan
- Reassign Vehicle
- Executive Order Tracking
- Report Stolen Vehicle
- Certificate of Reported Compliance
- View EINs

Fleet Information and EINs

Accounting for Early Credit in DOORS

- Reporting of some information will need to be completed after your fleet is reviewed and approved by ARB
  - Repowers
  - Previously retired vehicles
  - Adding a second engine to a vehicle
    - Scrapers that cannot be separated, 2 engine cranes

Fleet Summary
Compliance Planning (in progress)
– First time walkthrough

Welcome to the DOORS Compliance Planning Tool. You are now in the Setup page.

On your first visit, DOORS will take you through the various screens and give a brief description of each. This walkthrough should only take a few minutes, so let’s begin, shall we?

Notice at the top of the page there is a label: “Compliance Plan”. Below it is the name of a default compliance plan (consisting of all DOORS IDs and “Plan A”). DOORS has started to create your first default compliance plan. This is just one of many plans that you can generate with this tool.

Also, note the row of buttons at the top. These buttons are not enabled right now (except “Home” and “Main”). But will be if you choose, at the end of the first walkthrough.

In the future, this Setup page will be used to choose the tool and feel other settings to personalize this tool for you.

Please click on the “Next” button to go to the next page.

Calculate Compliance in Minutes

Uncheck the columns you would like to hide in the vehicle table below and then click on “Modest Current Year” or “Plus Another Year”. Change the following:

- Driver ID
- EID
- Vehicle type
- Vehicle model year
- HP
- Engine Size
- Exempt from refurb

<table>
<thead>
<tr>
<th>Driver ID</th>
<th>EID</th>
<th>Vehicle type</th>
<th>Vehicle model year</th>
<th>HP</th>
<th>Engine Size</th>
<th>Exempt from refurb</th>
<th>Exempt to</th>
</tr>
</thead>
<tbody>
<tr>
<td>DC-30</td>
<td>AL4080</td>
<td>Scapers</td>
<td>1973</td>
<td>41B</td>
<td>TD</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>CB-05</td>
<td>AL8484</td>
<td>Rollers</td>
<td>2009</td>
<td>12</td>
<td>THZ</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>CM-07</td>
<td>AM9983</td>
<td>Grader Tractors</td>
<td>1986</td>
<td>166</td>
<td>TD</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>CM-10</td>
<td>AS2489</td>
<td>Other Construction Equipment</td>
<td>1959</td>
<td>103</td>
<td>T2</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>SC-00</td>
<td>AV6585</td>
<td>Scapers</td>
<td>1974</td>
<td>122</td>
<td>TD</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>SC-04</td>
<td>AJ0985</td>
<td>Scapers</td>
<td>1985</td>
<td>147</td>
<td>TD</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Use Automated Strategies

DOORS ID: 2 Name: Sample Fleet with about 110 vehicles
Compliance Plan: 2_Plan_A Target Year: 2010

Turnover

Replace

- Oldest Tires
- Oldest Crawler
- Oldest Age
- Dond Replacement Vehicle Age

- Show vehicles exempt from turnover
- Show vehicles exempt from refurb

- Allow refurb of all non-tir 4 vehicles (ignore exemptions)
- Maintain Natural Turnover

Save and compare compliance plans

DOORS ID: 81 Name: Sample Small Fleet
Compliance Plan: 81_Plan_C Target Year: 2017

Check the columns you would like to show in the table below and then click on the “Compare” button:

- Driver ID
- EID
- Vehicle type
- Vehicle model year
- HP
- Engine Size

- Show vehicle replacement costs
- Show vehicle replacement YTD

- Show vehicle replacement YTD
- Show vehicle replacement YTD
- Show vehicle replacement YTD
- Show vehicle replacement YTD
- Show vehicle replacement YTD
- Show vehicle replacement YTD
- Show vehicle replacement YTD
- Show vehicle replacement YTD
- Show vehicle replacement YTD
- Show vehicle replacement YTD
**View VDECS Page**

- VDECS available based on engine family or engine info

<table>
<thead>
<tr>
<th>Make</th>
<th>Model</th>
<th>Year</th>
<th>VIN</th>
</tr>
</thead>
<tbody>
<tr>
<td>DUTZ</td>
<td>2C31-A</td>
<td>1987</td>
<td>23</td>
</tr>
<tr>
<td>REFINING ENGINEERS COMPANY LTD</td>
<td>4AX08</td>
<td>1998</td>
<td>2000</td>
</tr>
<tr>
<td>CATERPILLAR, INC</td>
<td>3CP410-SHRI</td>
<td>1999</td>
<td>104</td>
</tr>
<tr>
<td>CATERPILLAR, INC</td>
<td>1CP414-GS/5K</td>
<td>2001</td>
<td>363</td>
</tr>
</tbody>
</table>

**Reporting Tool: DOORS**

- Staff currently looking for fleets to use DOORS and get EINs early
  - Email doors@arb.ca.gov for information
  - Hotline 1-877-59DOORS (877-593-6677)
  - Advantage for fleets to
    - Receive EINs early
    - Get more than 30 days to label vehicles (until 30 days after reporting deadline)
- Help us help you

**Technology Demonstrations**

- **Scraper with Passive DPF**
- **Loader with Passive DPF**

**Off-Road Showcase Demonstration**

- $4.9 million allocated through SCAQMD (South Coast Air Quality Management District) & MSRC (Mobile Source Air Pollution Reduction Review Committee)
  - Close coordination with ARB
  - Achieve early emission reductions
  - Prove effectiveness of technologies on wide range of off-road engines
    - Interested fleets may view retrofits in action
  - Will spur verification of new retrofits
    - Applicants required to pursue verification concurrently with Showcase demonstration
Off-Road Showcase Cont.

- Emission control manufacturer participants
  - 14 Manufacturers, 26 systems
  - 11 Active DPFs
  - 15 Passive DPFs
  - 7 PM + NOx devices
  - 6 Fuel borne catalyst systems
- Eighteen Fleet Owners
  - 5 Public Fleets
  - 13 Private Fleets
- Total of 202 Vehicles

U.S. EPA SEP

- U.S. EPA settlement against Chevron and Valero
  - $700,000 in fines
- Settlement agreements stipulated money to be spent on retrofit of off-road equipment
- Overall goals similar to Showcase
- Help fill gaps in Vehicle Matrix
- Demonstrate Additional Technologies
- 26 vehicles have been successfully retrofitted with DPFs so far

Funding Programs

- Help some fleets obtain loans for which they would not otherwise qualify
- Pilot program for fleets in SJV
- Must meet criteria
- Apply at participating lenders
- More info: http://arb.ca.gov/ba/loan/loan.htm or contact Jessica Dean at jdean@arb.ca.gov
POLI Criteria

- < 100 employees
- <$10 mil annual revenues
- Loan for ARB-verified diesel retrofit
- Operate at least part time in SJV
- Difficulty obtaining conventional financing
- Any fleet sizes
- Other program & financial criteria

Carl Moyer Incentive Program

- Statewide program with $140 million/yr in incentive monies
- Program provides incentive money to clean up equipment in California
  - Equipment includes: off-road, on-road, marine, locomotive, agricultural
- Eligible off-road projects include engine repowers, exhaust retrofits, equipment replacement
- Vehicle owner has to pay a small portion of the project costs
- Must do more than required by regulation
- More information is located at: www.arb.ca.gov/msprog/moyer/moyer.htm

Is Incentive Funding Available?

- Small fleets
  - 100% eligible if completed by February 28, 2012
  - Eligible based on NOx and ROG reductions thereafter
- Medium fleets
  - 100% eligible if completed by February 28, 2010
  - Early compliance needed after
- Large fleets
  - Early compliance needed to receive funding

SOON Program
What is the SOON Program?

- Surplus Off-road Opt-in for NOx (SOON) program is designed to achieve additional NOx reductions.
- Local air districts may opt into this program to reduce NOx emissions beyond what is required by the off-road regulation.
  - May make program voluntary or mandatory.
- Carl Moyer incentive money is used to fund these additional NOx reductions.
- If fleets meet the applicable criteria, district may require them to apply for SOON funding.

Fleet Criteria for SOON

- If SOON mandatory, a fleet must apply if they:
  - Operate vehicles in participating air district.
  - Must have operated in that district more than any other air district and >100 hrs/yr for the past three years.
  - Contain over 20,000 hp statewide.
  - Have >40% Tier 0 & 1 vehicles.
- If they receive funds – must take actions funded.
- Must apply for enough actions to go from compliance with ARB rule to SOON targets.
- A way for large fleets to access incentive monies.

Participating Districts

- South Coast
  - Opted in on May 2, 2008.
  - Have already awarded $10 – $15 million.
  - Current solicitation due May 1, 2009.
- San Joaquin Valley
  - Will not be participating in the SOON program.

Compliance Assistance and Outreach
Compliance Assistance and Outreach

- Staff will be available to work with individual fleets on their compliance plans.
- Second round of four trainings conducted November – December 2008.
- Third round of six trainings February – March 2009.
- Staff available to give off-road presentations at the request of fleet owners, industry groups, equipment dealers and manufacturers.
- Contact Eric Brown (ebrown@arb.ca.gov) with questions.

Off-Road Implementation Advisory Group (ORIAG)

- Informal committee of affected fleets, air districts, and industry representatives.
- Goal is to help ARB to fine tune outreach and training materials, and assist with implementation.
- Members of the public welcome to attend.
- Three ORIAG meetings held since May, 2008 in Sacramento and El Monte.
  - Next meeting slated for February, 2009 in San Diego.
  - Subcommittee meetings held as needed.
- Contact Beth White (ewhite@arb.ca.gov) or visit http://www.arb.ca.gov/msprog/ordiesel/oriag/oriag.htm for more details.

Off-Road Fleet Average Calculator Overview

- Microsoft Excel spreadsheet tool designed by ARB staff.
- Fleet enters in horsepower and model year of each engine.
- Calculates the NOx and PM fleet averages, targets, and BACT requirements for each year.
- Also calculates early credit and carryover credits earned by fleets.

Enter in Baseline fleet information
ARB Website and Contacts

California Environmental Protection Agency
Air Resources Board
Off-Road Contacts

General Off-Road Regulation Questions:
Kim Heroy-Rogaiski, Manager
Off-road Implementation Section
kheroyro@arb.ca.gov
(916) 327-2200

Elizabeth Yura, Staff
eyura@arb.ca.gov
(916) 323-2397

Diesel vehicle information hot line:
(866) 6-DIESEL
(866) 634-3735

ORIAG/Safety:
Beth White, Staff
ewhite@arb.ca.gov
(916) 324-1704

DOORS:
Cory Parmer, Staff
pparmer@arb.ca.gov
(916) 323-1180

Carl Moyer Program:
Dinh Quach
dquach@arb.ca.gov
(626) 350-6485

General Off-Road Regulation - www.arb.ca.gov/msprog/ordiesel/ordiesel.htm
Verified Devices - www.arb.ca.gov/diesel/verdev/verdev.htm
Carl Moyer Program - www.arb.ca.gov/msprog/moyer/moyer.htm