

Email to All DOORS Fleets

Date Sent: December 20, 2012

Subject: Reminder Regarding Upcoming Off-Road Regulation Deadlines

Dear Off-Road Fleet Owner/Contact:

Thank you for reporting your off-road diesel vehicles in the Diesel Off-Road Online Reporting System (DOORS) for the California Air Resources Board's (ARB) In-Use Off-Road Diesel Vehicle Regulation (Off-Road Regulation). We are sending this notice to alert fleets to some coming changes to our DOORS system and to remind all fleets of a few provisions that will be effective beginning **January 1, 2013**, which are outlined below.

Reassigning Vehicles and Aggregating Fleet Functions in DOORS to be Disabled; Some Vehicle Characteristics to be Locked

As of March 1, 2013, fleets will no longer have the ability to move vehicles among fleets in their DOORS account using the "Reassign Vehicle" function and will no longer be able to change how their fleet portions are aggregated using the "Aggregate Fleet" function. Fleets under common ownership or control must decide now if/how they want to portion themselves, and ensure that parent fleets are reported properly.

By March 1, 2013, fleets must ensure their vehicle data for calendar year 2012 has been reported completely and correctly. For example, any vehicles that were low-use in 2012 must be designated as such by March 1, 2013. We suggest fleets do any reorganizing of fleet portions and characterizing of their vehicles (i.e., low-use designation, changing dates sold, etc.) prior to December 31, 2012.

Fleet Portions

The Off-Road Regulation allows companies or agencies that have different divisions, subsidiaries, or other organizational structures, to either report all vehicles owned by the company as one fleet and comply as one fleet, or to report and comply as individual **fleet portions** (i.e., smaller groups of vehicles). Fleets cannot divide into fleet portions arbitrarily; the divisions must correspond to a division fleet management, control, or location. Additionally, because a fleet's size is determined by the amount of horsepower under common ownership or control, reporting as multiple fleet portions does not allow the fleet to change fleet size categories. For example, if a large fleet (over 5,000 horsepower) decides to report and comply as many smaller fleet portions, each fleet portion (regardless of how much horsepower is in the fleet portion) must still comply with the large fleet reporting and compliance requirements. The Aggregate Fleet

function above allows fleets to group their fleet portions together for compliance purposes. However, this Aggregate Fleet function will no longer be available as of March 1, 2013.

For more information on reporting fleet portions in DOORS, please see the DOORS user guide on “How to Report Fleet Portions or Multiple Fleets”, which is available in the Knowledge Center on the Off-Road Regulation website at <http://www.arb.ca.gov/msprog/ordiesel/knowcenter.htm>.

NEW LABELING REQUIREMENTS FOR IN-USE OFF-ROAD DIESEL VEHICLES

EFFECTIVE JANUARY 1, 2013

Labels Required on Both Sides for All Vehicles

Since 2009, vehicles subject to the Off-Road Regulation were required to be reported to the ARB and labeled with a unique Equipment Identification Number (EIN) on the right side of the vehicle. As of January 1, 2013, all previously reported vehicles must be labeled on both sides, and all vehicles reported after that date must be labeled on both sides within 30 days of receiving the EIN.

Green Labels Required for Captive Attainment Area Fleets

There is also a new requirement for labels on vehicles owned by fleets who designate themselves as captive attainment area fleets. Because captive attainment area fleets are considered small fleets regardless of their total horsepower, the labels on vehicles owned by captive attainment area fleets must be changed in order to differentiate them from other vehicles not eligible for this provision. By January 1, 2013, the EIN labels for vehicles owned by captive attainment area fleets must be white on a green background.

More information about how the labels must appear is available at <http://www.arb.ca.gov/msprog/ordiesel/faq/faq-labeling.pdf>.

REMINDER RE: DEADLINE FOR VERIFIED DIESEL EMISSIONS CONTROL STRATEGIES (VDECS) FOR LARGE FLEETS

Large fleets that order VDECS by 12/31/2012 will still receive double credit even if the installation of the VDECS is not completed until 2013.

ANNUAL REPORTING FOR THE IN-USE OFF-ROAD DIESEL VEHICLE REGULATION REQUIRED BY MARCH 1, 2013 FOR LARGE FLEETS

Annual Reporting Deadlines

Large fleets may wish to begin preparing for their next annual reporting deadline, which is March 1, 2013. The report must include a signed statement, called a Responsible Official Affirmation of Reporting (ROAR), affirming that the fleet information reported is accurate and that the fleet is in compliance, as well as low-use vehicle engine hour meter readings and use data for agricultural vehicles (as applicable).

For More Information

For information about the Off-Road Regulation, including the regulation language, visit the website at <http://www.arb.ca.gov/ordiesel>. The Knowledge Center at <http://www.arb.ca.gov/msprog/ordiesel/knowcenter.htm> contains many guidance documents which explain the regulation. For questions regarding off-road reporting, you may contact the DOORS hotline at (877) 59-DOORS [(877) 593-6677] or by email at doors@arb.ca.gov. For general questions about diesel regulations, you may contact the Diesel hotline at (866) 6-DIESEL [(866) 634-3735].

Thank you for your consideration of this very important information.

Sincerely,

The California Air Resources Board

In-Use Off-Road Diesel Vehicle Regulation Staff