Off-Road Implementation Advisory Group

September 26, 2008

California Environmental Protection Agency
Air Resources Board

Agenda

1. Presentation – VDECS How-To
2. Regulation Implementation Update - ARB
3. Subcommittee Reports
4. Public Comment Period

E-mail questions to: onair@arb.ca.gov

VDECS How-To

Rasto Brezny
Manufacturers of Emission Controls Association

Regulation Implementation Update

• Outreach
• Demonstration Projects
• DOORS
• Installation Clearinghouse
• U.S. EPA Waiver
• Two-Engine Crane Amendment
• Data from Engine Manufacturers
• Guidance Documents
• Safety
Outreach

- Statewide training sessions
- Speaking to interested groups
- Contractors State License Board

Getting Word Out for Trainings

- 12,000 flyers
- Hundreds of phone calls
  - Largest construction companies
  - Dealers
- E-mail lists
  - Portable equipment, public fleets, Moyer, etc.
- Newspapers
  - Free advertisements
- Air districts

Training Session Locations

- Redding
- Ventura
- Nevada City
- Sacramento
- San Diego
- San Luis Obispo
- Bakersfield
- Fresno
- Riverside
- El Monte
- Oakland
- Sacramento
- San Jose

Training Session Statistics

- 12 locations
- ~1,300 attendees total
- ~ 3 hours long each
- Feedback forms
  - Very positive
  - Over 4.3 on scale of 1 to 5 (no to yes) in answer to questions:
    - Was it worthwhile to attend?
    - Presenter knowledgeable?
    - Understood material presented?
Training Session Content

• Presented:
  – Background: need for regulation and retrofits
  – Regulation requirements in detail
  – Reporting system (DOORS)
  – Compliance planning tools
  – Contact info
• Good suggestions
  – Example: creating a list of label vendors on our website
• DVD currently being made from Sacramento webcast
  Slated to schedule more sessions in the fall/winter

Most Common Questions

• What are engine Tiers?
• How do I report if I’m missing information about vehicles or engines?
• What will the cost of the regulation be?
• Is there a way to make operators, and not owners, responsible for idling violations?
• How do I demonstrate to ARB that there are no available options to retrofit, repower or replace my vehicles?
• For sales disclosure, what about auction houses and trade-ins?

Speaking to Interested Groups

• In the past two months:
  – 7/22: Diamond D Engineering and Associates
  – 8/6: Attended Ritchie Brothers auction and distributed materials
  – 8/21: Building Industry Association
  – 8/27: Maintenance Superintendents Association
  – 8/28: Tahoe Truckee Sierra Disposal
  – 9/10: Rush Enterprises
  – 9/10: AGC
  – 9/17: Public Works Event / AGC

Upcoming Presentations

• 10/3: Tractoberfest
• 10/14: Concrete Modification Contractor’s Association
• 10/21 – 10/22: IEA/CMTA/CICC Statewide Environmental Summit in San Diego - “Navigating in an Ever-Greening World”
• 11/10: California GCSA
Contractors State License Board

- Article on the Regulation in the Summer 2008 newsletter
  - Sent to all licensed contractors in CA
- Reached hundreds of small contractors for the first time (175 calls)
- Currently working with CSLB to:
  - Include regulation info in other communications they send to contractors
  - Coordinate enforcement

Demonstration Projects

- SEP
  - I: 15 installations in Southern California (Chevron - $300,000)
  - II: 12 installations in Southern California (Valero - $200,000)
  - III: 12 installations in Northern California (Valero - $200,000)

Showcase

- 4 installations complete
- Some contract delays
- 25 to 40 vehicles expected to be retrofitted by the end of the year

DOORS Status

- Released online September 3, 2009
- Staff strongly encouraging early reporting
- As of September 23, 2008:
  - 22 fleets/sub-fleets with 3,510 vehicles have reported and received their Equipment Identification Numbers (EINs) so far
  - 39 fleets/sub-fleets with 1,550 vehicles have entered data and could request EINs soon
- Email address for DOORS questions
  - doors@arb.ca.gov
Early Reporting and Labeling

- If report early, EINs must be affixed by 30 days after initial reporting deadline
  - May 1, 2009 for large fleets, etc.
- If not reported early, EINs must be affixed within 30 days of receipt
- Fleets may report and request EINs any time between now and the initial reporting date
  - Reporting early will give fleets more time to label devices
  - If initial reporting is done early and fleet changes prior to March 1, 2009, fleets may make changes up to the reporting date

Guides and Field Definitions

- Guides:
  - Report using spreadsheets
  - Reporting using online forms
  - Cut and paste into the spreadsheets
- Field definitions for:
  - Owner
  - Vehicle
  - Engine
  - VDECS information
- Guides in progress:
  - Subfleets
  - Reporting with missing information

DOORS – In Progress

- Compliance planning tools customization
- Identifying and answering FAQs
  - Identifying unique circumstances
- Hardcopy: forms and reporting process
- DOORS help hotline
- Help materials to be included w/ EIN mailer

DOORS – Future

- Encourage early reporting
  - Suggestions for outreach welcome
- Continue to encourage feedback
- Monitor “customer” support for quality and timely responses
- Continued development
Installation Clearinghouse

- Voluntary submittal of successful VDECS installations to be shared online
  - Details on vehicle, engine, VDECS, and installation method
  - Pictures
- Small initial pool of data
- Encourage participation and submittals
- How to get fleets/installers to provide data?
  - Contact: Cory Parmer, parmer@arb.ca.gov

Clearinghouse Mock-up

U.S. EPA Waiver

- Need waiver to fully enforce regulation
- Waiver request submitted to U.S. EPA on August 12, 2008
  - On our website at http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm
  - U.S. EPA Hearing to be scheduled

Two-Engine Crane Amendments

- ARB proposing to add two-engine cranes to off-road regulation
  - To be considered in December 2008 as part of truck and bus rule package
  - Both engines pulled into off-road regulation
  - Cranes removed from portable engine registration and ATCM requirements
  - Will not affect SOON status of fleets with such cranes
Engine Manufacturer Letter
- Requested look-up table giving engine serial numbers and engine family names for all off-road engines that have been produced
  - Will help with DOORS entries
  - Will help with installation of correct VDECS
- 3 manufacturers provided data
- Limited cooperation from American manufacturers to date

Guidance Documents and FAQs
- FAQs
  - Portable Equipment
  - Labeling
  - Early Credit
  - Engine Model Year
  - Public Fleet Size
- Guidance Documents
  - Enforcement of Requirements to Use On-Road Certified Engines in On-Road Registered Vehicles
  - Agricultural
  - Written Idling Policy

Documents Currently Under Review
- On-road engines in off-road vehicles
- Feasible VDECS regeneration times and what to do if only VDECS available is plug-in and there is no feasible power source
- De-verified devices
- Yard Trucks

Safety Subcommittee
- Safety standards assembled, reviewed, summarized, and applicable ones determined
  - Ordered more now that budget has passed
- MSHA/OSHA
  - Working with ARB to establish a procedure to evaluate claims (and appeals) that a VDECS can not be safely installed
Applicable Enforcement Issues

- Dealers or distributors are removing the substrate for cleaning, and operators are running the vehicles without the filter, which will cause a violation and fine up to $10,000
- Fleet owners do need to maintain the datalogs of their exhaust profile to show whether their vehicle meets the active or passive regeneration requirements.

Subcommittee Reports

- Fleets
- Diesel Emission Control Strategies
- Outreach
- DOORS
- Safety

Fleets Subcommittee

Dave Porcher: Chair

Diesel Emission Control Strategies (DECS) Subcommittee

Charlie Cox: Chair
Outreach Subcommittee

- Kim Heroy-Rogalski: Chair

Diesel Off-road On-line Reporting System (DOORS) Subcommittee

- Jeff Wilson: Chair

Safety Subcommittee

- Beth White: Chair

Off-Road Contacts

- Kim Heroy-Rogalski, Manager Off-road Implementation Section
  kheroyro@arb.ca.gov
  (916) 327-2200

- Fleet Average Calculator:
  Elizabeth Yura, Staff
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  (916) 323-2397

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

- ORIAG:
  Beth White, Staff
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  (916) 324-1794

- DOORS:
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- 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
Save the Date

- The next ORIAG Meeting is scheduled for:
  - November 17, 2008
  - CalTrans Building
  - San Diego

Public Comment Period

Email for sending comments:
onair@arb.ca.gov