

**Comment 1 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: John

Last Name: Powell

Email Address: jopowell@starband.net

Affiliation:

Subject: industrial equipment

Comment:

I think the state is trying to go to far, small companies can not afford to change update or modify their equipment for emissions . I think you should stay out these small use areas and concentrate your efforts on the high volume fuel users and maintain sufficientstaff to do so , lay off remaining staff and save the tax payers the money.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-04-07 20:52:58

No Duplicates.

**Comment 2 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Michael

Last Name: Murphy

Email Address: michael@ctsl.com

Affiliation:

Subject: Adding CO2 Levels To Emission Requirements

Comment:

Carbon dioxide (CO2) is a major cause of global warming. Fuel cell vehicles that use reformulated gasoline produce large amounts of CO2. Fuel cells are likely to be used in future models of forklifts and other industrial equipment. I urge CARB to include restrictions on CO2 emissions in this rulemaking, and to implement CO2 restrictions on passenger vehicles and trucks.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-04-23 06:53:50

No Duplicates.

**Comment 3 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Rob

Last Name: Neenan

Email Address: Non-web submitted comment

Affiliation: California League of Food Processors

Subject: Proposed CARB Rule Regarding LSI Engines Greater than 25 Horsepower

Comment:

Please see attached comment.

Attachment: 'www.arb.ca.gov/lists/lore2006/7-lore2006-1.pdf'

Original File Name: lore2006-1.pdf

Date and Time Comment Was Submitted: 2006-05-04 09:30:54

No Duplicates.

**Comment 4 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 5 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Martin

Last Name: Boyd

Email Address: martin.boyd@tmhu.com

Affiliation: Toyota National Product Planning Manager

Subject: Comments for New Emission Standards, Fleet Req., & Test Procedures for Forklifts & Other..

Comment:

We, TOYOTA INDUSTRIES CORPORATION, respectfully submit these comments concerning the Public Hearing to Consider Adoption of New Emission Standards, Fleet Requirements, and Test Procedures for Forklifts and other Industrial Equipment.

Attachment: 'www.arb.ca.gov/lists/lore2006/10-2006-05-23\_carb\_public\_comment.pdf'

Original File Name: 2006-05-23 CARB Public Comment.pdf

Date and Time Comment Was Submitted: 2006-05-23 07:40:17

No Duplicates.

**Comment 6 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Rene

Last Name: Trevino

Email Address: RandalFriedman1@comcast.net

Affiliation: Department of the Navy

Subject: Proposed New Emission Standards, Fleet Req., & Test Procedures for Forklifts...

Comment:

Please see attached comment.

Attachment: 'www.arb.ca.gov/lists/lore2006/11-lore2006-6.pdf'

Original File Name: lore2006-6.pdf

Date and Time Comment Was Submitted: 2006-05-23 08:50:34

No Duplicates.

**Comment 7 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Gary

Last Name: Cross

Email Address: gcross27103@earthlink.net

Affiliation: Industrial Truck Association

Subject: ITA Comments on LSI Proposal

Comment:

Please see attached comment; 2 attachments also submitted as comments. The additional attachments are located at 1001 I Street, 23rd Floor (ARB Legal).

Attachment: 'www.arb.ca.gov/lists/lore2006/12-lore2006-7.pdf'

Original File Name: lore2006-7.pdf

Date and Time Comment Was Submitted: 2006-05-23 08:59:33

No Duplicates.

**Comment 8 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Antonio  
Last Name: Santos  
Email Address: asantos@meca.org  
Affiliation: MECA

Subject: MECA's Comments on ARB's Rulemaking for Forklifts and Other Industrial Equipment  
Comment:

May 22, 2006

SENT VIA ON-LINE SUBMISSION FORM:  
[www.arb.ca.gov/lispub/comm/bcsubform.php?listname=lore2006&comm\\_period=A](http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=lore2006&comm_period=A)

Clerk of the Board  
Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, California 95814

RE: ARB Rulemaking to Consider the Adoption of New Emission Standards, Fleet Requirements, and Test Procedures for Forklifts and Other Industrial Equipment

To whom it may concern:

Please find attached a copy of the written testimony submitted by the Manufacturers of Emission Controls Association (MECA) regarding the above-referenced rulemaking.

Thank you for your assistance.

Sincerely,

Joe Kubsh  
Executive Director

Attachment: 'www.arb.ca.gov/lists/lore2006/13-arb\_off-road\_lsi\_testimony\_052206.pdf'

Original File Name: ARB off-road LSI testimony 052206.pdf

Date and Time Comment Was Submitted: 2006-05-23 09:17:39

No Duplicates.



**Comment 9 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Barbara

Last Name: Lee

Email Address: Non-web submitted comment

Affiliation: CAPCOA

Subject: CARB Proposed Adoption of New Emission Standards, Fleet Req., & Test Procedures...  
Comment:

Please see attached comment.

Attachment: 'www.arb.ca.gov/lists/lore2006/15-lore2006-9.pdf'

Original File Name: lore2006-9.pdf

Date and Time Comment Was Submitted: 2006-05-23 11:51:54

No Duplicates.

**Comment 10 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Kathryn

Last Name: Phillips

Email Address: kphillips@environmentaldefense.org

Affiliation: Environmental Defense

Subject: Letter to the Board Addressing the LSI Engine Emissions Standards and Fleet Requirements

Comment:

Please find attached comments on the LSI rule to be taken up by the Board later this week. These comments are jointly submitted by Environmental Defense, Coalition for Clean Air, American Lung Association of California, and Union of Concerned Scientists.

Attachment: 'www.arb.ca.gov/lists/lore2006/16-comments\_on\_lsi\_rule\_05\_23\_06.doc'

Original File Name: Comments on LSI Rule 05 23 06.doc

Date and Time Comment Was Submitted: 2006-05-23 15:49:19

No Duplicates.

**Comment 11 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Jeff  
Last Name: Endsley  
Email Address: jeff.endsley@united.com  
Affiliation:

Subject: United Airlines Comments on LSI  
Comment:

Please accept the attached comments on the LSI rule.

Jeff Endsley.  
United Airlines

Attachment: 'www.arb.ca.gov/lists/lore2006/17-5.24.06\_ua\_-\_united\_comments\_on\_lsi.pdf'

Original File Name: 5.24.06 UA - United Comments on LSI.pdf

Date and Time Comment Was Submitted: 2006-05-24 09:17:28

No Duplicates.

**Comment 12 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Roger

Last Name: Gault

Email Address: rgault@emamail.org

Affiliation: Engine Manufacturers Association

Subject: COMMENTS ON AGENDA ITEM 06-5-4

Comment:

See attached comments on Agenda Item 06-5-4

Attachment: 'www.arb.ca.gov/lists/lore2006/18-lore2006-11.pdf'

Original File Name: lore2006-11.pdf

Date and Time Comment Was Submitted: 2006-05-24 09:37:30

No Duplicates.

**Comment 13 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Karen

Last Name: Hay

Email Address: KHay@ImpcoTechnologies.com

Affiliation: IMPCO Technologies

Subject: Comments on the Proposed MY2010 LSI HC+NOx Emission Standards

Comment:

Please see the attached comments, particularly the proposed Option 2 on page 2.

Attachment: 'www.arb.ca.gov/lists/lore2006/19-impco\_lsi\_comments.pdf'

Original File Name: IMPCO LSI Comments.pdf

Date and Time Comment Was Submitted: 2006-05-24 09:39:46

No Duplicates.

**Comment 14 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Kazuo

Last Name: Kojima

Email Address: kazou-kojima@mail.nissan.co.jp

Affiliation: Nissan Motor Co., LTD

Subject: Nissan's Comments on Rulemaking to Consider Adoption of New Emission Standards,...

Comment:

Please see attached comment. Comment also has Confidential attachment included. This comment was previously #4 on the comlog list.

Attachment: 'www.arb.ca.gov/lists/lore2006/20-lore2006-14.pdf'

Original File Name: lore2006-14.pdf

Date and Time Comment Was Submitted: 2006-05-24 10:06:59

No Duplicates.

**Comment 15 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Lawrence

Last Name: Keller

Email Address: larry.keller@polarisind.com

Affiliation: Polaris Industries Inc.

Subject: LSI Engine Rulemaking Comments

Comment:

PLease see attached file regarding vehicle applications using all terrain vehicle engines.

Attachment: 'www.arb.ca.gov/lists/lore2006/21-polaris\_lsi\_comments\_2006-05-24.pdf'

Original File Name: Polaris LSI Comments 2006-05-24.pdf

Date and Time Comment Was Submitted: 2006-05-24 10:42:23

No Duplicates.

**Comment 16 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Stephanie

Last Name: Williams

Email Address: mschrap@caltrux.org

Affiliation: California Trucking Association

Subject: Emission Standards, Fleet Requirements, and Test Procedures for Forklifts and other Indust

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/lore2006/22-5-24-06\_forklift\_comments.pdf'

Original File Name: 5-24-06 Forklift Comments.pdf

Date and Time Comment Was Submitted: 2006-05-24 11:15:31

No Duplicates.



**Comment 17 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Timothy

Last Name: Pohle

Email Address: tpohle@airlines.org

Affiliation: Air Transport Association of America, Inc

Subject: ATA Comments on Proposed Large Spark-Ignition Rule

Comment:

To the Clerk of the Board:

Please see the attached comments of the Air Transport Association of America, Inc. (ATA) concerning the Air Resources Board's (ARB's) "Notice Of Public Hearing To Consider Adoption Of New Emission Standards, Fleet Requirements, And Test Procedures For Forklifts And Other Industrial Equipment."

If you have any questions concerning the attached or would like additional information, please contact Tim Pohle, Assistant General Counsel, Environmental Affairs, ATA, at 202-626-4216 or tpohle@airlines.org.

Attachment: 'www.arb.ca.gov/lists/lore2006/24-2006-05-24\_ata\_comments\_re\_lsi\_rule\_with\_attachments.pdf'

Original File Name: 2006-05-24 ATA Comments re LSI rule with attachments.pdf

Date and Time Comment Was Submitted: 2006-05-24 11:48:57

No Duplicates.

**Comment 18 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 45 Day.**

First Name: Robert

Last Name: Wyman

Email Address: ROBERT.WYMAN@lw.com

Affiliation: Latham and Watkins

Subject: Comments on LSI rulemaking

Comment:

Please see attached letter.

Attachment: 'www.arb.ca.gov/lists/lore2006/25-comment\_letter\_for\_lsi\_rule\_v2.doc'

Original File Name: Comment Letter for LSI Rule v2.doc

Date and Time Comment Was Submitted: 2006-05-24 11:53:19

No Duplicates.

**Comment 1 for Forklifts and Other Industrial Equipment 2006 (lore2006).  
(At Hearing)**

First Name: Karen

Last Name: Hay

Email Address: khay@impcotechnologies.com

Affiliation: IMPCO Technologies

Subject: Comment for New Emission Standards, Fleet Requirements, & Test Procedures for Forklifts...

Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/lore2006/26-lore2006-ws-1.pdf](http://www.arb.ca.gov/lists/lore2006/26-lore2006-ws-1.pdf)

Original File Name: lore2006-ws-1.pdf

Date and Time Comment Was Submitted: 2006-05-26 11:10:50

No Duplicates.

**Comment 1 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 15-1.**

First Name: Rob

Last Name: Neenan

Email Address: rob@clfp.com

Affiliation: CA League of Food Processors

Subject: CLFP Comments regarding proposed modifications to the LSI forklift rule  
Comment:

Enclosed please find the comments of the California League of Food Processors regarding CARB's proposed modifications to the LSI forklift emissions rule.

Attachment: [www.arb.ca.gov/lists/lore2006/27-clfp\\_comments\\_re\\_modified\\_lsi\\_forklift\\_rule.doc](http://www.arb.ca.gov/lists/lore2006/27-clfp_comments_re_modified_lsi_forklift_rule.doc)

Original File Name: CLFP Comments re modified LSI forklift rule.doc

Date and Time Comment Was Submitted: 2006-12-05 16:00:40

No Duplicates.

**Comment 2 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 15-1.**

First Name: Roger

Last Name: Gault

Email Address: rgault@emamail.org

Affiliation: Engine Manufacturers Association

Subject: EMA Comments to the 15-day Notice of ARB's Proposed Off-Road LSI Fleet Requirements

Comment:

Comments of the Engine Manufacturers Association to ARB's 15-day Notice of the Proposed Modifications to the Off-Road LSI Fleet Requirements

Attachment: [www.arb.ca.gov/lists/lore2006/28-2006\\_12\\_18\\_ema\\_comments\\_to\\_15-day\\_notice\\_arb\\_proposed\\_off-road\\_large\\_spark-ignition\\_engine\\_and\\_fleet\\_requirements.pdf](http://www.arb.ca.gov/lists/lore2006/28-2006_12_18_ema_comments_to_15-day_notice_arb_proposed_off-road_large_spark-ignition_engine_and_fleet_requirements.pdf)

Original File Name: 2006 12 18 EMA COMMENTS TO 15-DAY Notice Arb PROPOSED OFF-ROAD LARGE SPARK-IGNITION ENGINE AND FLEET REQUIREMENTS.pdf

Date and Time Comment Was Submitted: 2006-12-18 13:17:55

No Duplicates.

### **Comment 3 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 15-1.**

First Name: Harada  
Last Name: Hidemi  
Email Address: hi-harada@mail.nissan.co.jp  
Affiliation:

Subject: SAE J2260 Category-1 Specification  
Comment:

Dear Sir :

Nissan would like to point out one issue regarding the permeation specification for evaporative emission regulation. Nissan believes CARB thinks to enforce the same evaporative regulation as that of the U.S. EPA. If so, CARB should describe such as SAE J2260(1996). The SAE J2260 has been revised in 2004 year and the permeation specification was changed as below.

1996 version Category-1 spec. HC : 0 •` 25 g/m2/day

2004 version Category-1 spec. HC : 3 •` 10

The U.S. EPA's current regulation uses the 1996 year version value.

So, we recommend CARB to clarify the permeation specification like SAE J2260(1996).

Best Regards,  
H. Harada  
Unit Planning Section  
Engineering Department  
Industrial Machinery Division  
Nissan Motor Co., Ltd.  
TEL : +81-46-252-3243  
FAX : +81-46-252-3313  
E-mail : hi-harada@mail.nissan.co.jp

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-01-10 20:43:18

No Duplicates.

**Comment 4 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 15-1.**

First Name: Gary

Last Name: Cross

Email Address: gcross27103@earthlink.net

Affiliation: Industrial Truck Association

Subject: 15-day comments on LSI rulemaking

Comment:

Please find attached the comments of the Industrial Truck Association on the Notice of Public Availability of Modified Text for the Adoption of New Emission Standards, Fleet Requirements, and Test Procedures for Forklifts and other Industrial Equipment

Attachment: [www.arb.ca.gov/lists/lore2006/33-ita\\_15-daycomments.doc](http://www.arb.ca.gov/lists/lore2006/33-ita_15-daycomments.doc)

Original File Name: ITA 15-daycomments.doc

Date and Time Comment Was Submitted: 2007-01-11 12:44:22

No Duplicates.

**Comment 5 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 15-1.**

First Name: Karen

Last Name: Hay

Email Address: KHay@ImpcoTechnologies.com

Affiliation: IMPCO Technologies

Subject: IMPCO's Comments to ARB's Proposed Modifications to the LSI Regulations  
Comment:

See the attached for IMPCO's comments to ARB's proposed modifications to the LSI regulations.

Attachment: [www.arb.ca.gov/lists/lore2006/35-impco\\_lsi\\_comments\\_1-12-07.pdf](http://www.arb.ca.gov/lists/lore2006/35-impco_lsi_comments_1-12-07.pdf)

Original File Name: IMPCO LSI Comments 1-12-07.pdf

Date and Time Comment Was Submitted: 2007-01-12 15:26:12

No Duplicates.



**Comment 1 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 15-2.**

First Name: Ed

Last Name: Hardiman

Email Address: ed.hardiman@dot.ca.gov

Affiliation:

Subject: LSI Impact on Caltrans Fleet

Comment:

To comply with the upcoming Large Spark Ignited (LSI) Rule as proposed for forklifts, the estimated capital cost will be a minimum \$3 million.

There will also be numerous operational costs; e.g. PY's, Specifications, Purchasing. Additional operating costs will also be incurred due to the additional record keeping needed to meet the requirements of section 2775.2.

Addition costs will come from installation labor and maintenance of all retrofits on existing equipment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-02-16 15:51:52

No Duplicates.

**Comment 2 for Forklifts and Other Industrial Equipment 2006 (lore2006) - 15-2.**

First Name: Karen

Last Name: Hay

Email Address: KHay@ImpcoTechnologies.com

Affiliation: IMPCO Technologies

Subject: IMPCO's Comments to ARB's Second Notice of Proposed Modifications to the LSI Regulations

Comment:

See the attached for IMPCO's Comments to ARB's Second Notice of Proposed Modifications to the LSI Regulations.

Attachment: [www.arb.ca.gov/lists/lore2006/53-07-02-16\\_impco\\_lsi\\_comments.pdf](http://www.arb.ca.gov/lists/lore2006/53-07-02-16_impco_lsi_comments.pdf)

Original File Name: 07-02-16 IMPCO LSI Comments.pdf

Date and Time Comment Was Submitted: 2007-02-16 17:47:17

No Duplicates.