

## **Comment 1 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: chris

Last Name: wortman

Email Address: papabear911@comcast.net

Affiliation:

Subject: AB32

Comment:

To who it may concern.

I would like to share my feelings with you about the effects of AB32 on my small business and my family.

We have 3 dump trucks working in the construction trade.

The newest one is a 1991.

These 3 trucks support 4 families. Three drivers families and our family.

The construction trade works only a partial year as Winter shuts us down and county grading work is excluded from Oct 15 through April 15 so our window of opportunity to make money is small.

We are not like big companies that haul year round, who put on high miles and re-power every few years regardless of AB32 as their trucks are worn out.

The new requirements cannot be met financially with the income that is generated, even with partial grant money.

Three new trucks for our company would be a dream, but it's that, just a dream.

AB32 on the other hand is a real live nightmare for my family and 3 others.

For the first time in my life I truly understand the meaning of being distraught.

I have no solution to this problem. The money simply is not there to comply with AB32

I have worked hard in this business, 33 years now and with the high cost of doing business it has been a difficult to keep us in the black and everyone paid.

Now AB 32 looks like it could put an end to our 33 years of hard work.

I am a single full time parent to twin 14 yo. kids with no other means of support.

I'm sure they would like to go to college. But we cannot afford to even stay in business if AB32 prevails.

How can this be done to 4 families?

How can anyone justify taking our only means of support?

I rarely ask for help. I never need assistance. I have yet to fail my family.

But now I really don't know what to do.

For every letter you receive there are probably thousands of people just like us that you don't hear from but are in the same situation.

Put yourself in our shoes. What if everything you worked for was taken away.

The very ability to support your family.

Think about it.

Does anyone even care?

Chris, Chase and Chelsea Wortman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-29 13:04:48

No Duplicates.

**Comment 2 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Kevin

Last Name: Rodgers

Email Address: kevin.rodgers@allisontransmission.com

Affiliation: Allison Transmission Inc.

Subject: Comments regarding HDGHG2013

Comment:

Please see the attached letter of comments from Allison  
Transmission Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/60-ghg2013-UDgAYgZgBzxVNAMx.pdf](http://www.arb.ca.gov/lists/com-attach/60-ghg2013-UDgAYgZgBzxVNAMx.pdf)

Original File Name: HDGHG2013\_Allison Transmission Inc\_Comments.PDF

Date and Time Comment Was Submitted: 2013-11-15 13:13:08

No Duplicates.

**Comment 3 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

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

## **Comment 4 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Jim  
Last Name: Zaben  
Email Address: jzaben@kingsoiltools.com  
Affiliation: Kings Oil Tools

Subject: Comments on Proposed GHG Phase I Regulations  
Comment:

Dear Honorable Board Members,

Kings Oil Tools (KOT) is struggling with the proposed GHG regulation. KOT has 31 trucks in its fleet. Since 2008, KOT has upgraded 70% of its 31 truck fleet at a cost of approximately 2.48 million dollars. In addition, KOT has invested about 4.3 million dollars upgrading its off-road fleet. All of this capital was invested in an effort to comply with the Truck Regs and the Off-Road Regs. KOT is a small part of the total oilfield service industry with a total fleet of over 3,000 on-road vehicles operating in California.

KOT and the oilfield service industry is with complying with the requirements of the Truck Regs as well as with the requirements of the Off-Road Regs and the Portable Equipment Registration Program. All of these regulations require the installation of PM filters and the replacement of engines to the 2010 standard or a Tier 4 standard for off-road engines. This is an enormous capital investment by the stakeholders in the oilfield service industry. This kind of cash drain will impact the economics in the California oil industry and could cost jobs.

Lastly, it should be noted that in 2011 there were approximately 250 businesses that left California and now (2013) there have been 158 businesses leave California due to regulations. In fact Intel and McAfee will be leaving California this December due to regulations.

We need to slow down on regulation development and see what the net result will be on our current emission reductions.

Sincerely,

Jim Zaben

Environmental Manager  
Kings Oil Tools

Attachment: [www.arb.ca.gov/lists/com-attach/6-hdghg2013-Am5UNwF0UnUKaQZ0.docx](http://www.arb.ca.gov/lists/com-attach/6-hdghg2013-Am5UNwF0UnUKaQZ0.docx)

Original File Name: Letter to Staff on the new GHG Proposal.docx

Date and Time Comment Was Submitted: 2013-11-25 07:49:06

No Duplicates.

**Comment 5 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: James

Last Name: Thomas

Email Address: james.thomas@nabors.com

Affiliation: Nabors Completion & Production

Subject: Comments Regarding Proposed Greenhouse Gas Regulations

Comment:

Please review the attached comments from Nabors Completion & Production Services Co.

Attachment: [www.arb.ca.gov/lists/com-attach/7-hdghg2013-UjVSPAFnWVVSJgRh.pdf](http://www.arb.ca.gov/lists/com-attach/7-hdghg2013-UjVSPAFnWVVSJgRh.pdf)

Original File Name: GHG Regulation Comments 112013.pdf

Date and Time Comment Was Submitted: 2013-11-25 08:27:08

No Duplicates.

**Comment 6 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

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



**Comment 7 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

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

**Comment 8 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Doug

Last Name: Van Allen

Email Address: Douglas.Vanallen@bakerhughes.com

Affiliation: Baker Hughes Oilfield Services Inc.

Subject: Comments on changes to GHG on highway truck rules

Comment:

Please review Baker Hughes comments on the GHG changes.

Thank you for your time, Doug

Attachment: [www.arb.ca.gov/lists/com-attach/15-hdghg2013-VzNTI1MzWVUFYANs.pdf](http://www.arb.ca.gov/lists/com-attach/15-hdghg2013-VzNTI1MzWVUFYANs.pdf)

Original File Name: DVA Comment letter 11-22-13.pdf

Date and Time Comment Was Submitted: 2013-12-03 14:17:12

No Duplicates.

**Comment 9 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

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

**Comment 10 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Brian

Last Name: Johnston

Email Address: brian@lightninghybrids.com

Affiliation:

Subject: Lightning Hybrids written comments concerning Proposed Amendments to HD HEV Certification

Comment:

Attached are Lightning Hybrids written comments concerning:  
"Proposed Amendments to the California Interim Certification Procedures for 2004 and Subsequent Model Hybrid-Electric and other Hybrid Vehicles, in the Urban Bus and Heavy-Duty Vehicle Classes."

Attachment: [www.arb.ca.gov/lists/com-attach/17-hdghg2013-BWkFalE3UGsLeQBu.pdf](http://www.arb.ca.gov/lists/com-attach/17-hdghg2013-BWkFalE3UGsLeQBu.pdf)

Original File Name: Lightning Hybrids Written Comments on HD HEV Certification Procedures 09Dec13.pdf

Date and Time Comment Was Submitted: 2013-12-09 11:10:51

No Duplicates.

**Comment 11 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Jamie  
Last Name: Song  
Email Address: jsong@meca.org  
Affiliation: MECA

Subject: Comments on ARB's Proposed Optional Reduced Emission Standards for Heavy-Duty Engines

Comment:

Please find attached the Manufacturers of Emission Controls Association's (MECA) public comments on ARB's proposed Optional Reduced Emission Standards for Heavy-Duty Engines.

Sincerely,  
Jamie Song

Attachment: [www.arb.ca.gov/lists/com-attach/18-hdghg2013-AWwFZgZkBzUAWQZl.pdf](http://www.arb.ca.gov/lists/com-attach/18-hdghg2013-AWwFZgZkBzUAWQZl.pdf)

Original File Name: MECA comments on ARB Optional Low NOx(final).pdf

Date and Time Comment Was Submitted: 2013-12-10 06:23:59

No Duplicates.

## **Comment 12 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: TIMOTHY  
Last Name: BLUBAUGH  
Email Address: tblubaugh@emamail.org  
Affiliation:

Subject: EMA Comments  
Comment:

The Truck and Engine Manufacturers Association ("EMA") hereby submits its comments on the California Air Resources Board's ("CARB's") Notice of Public Hearing to consider several proposed regulations related to heavy-duty engines and vehicles (the "HD Rulemaking Package"). See 43-Z Cal. Regulatory Notice Reg. 1656-1668 (Oct. 25, 2013).

Attachment: [www.arb.ca.gov/lists/com-attach/19-hdghg2013-VGZdawMzVDQFXFR1.pdf](http://www.arb.ca.gov/lists/com-attach/19-hdghg2013-VGZdawMzVDQFXFR1.pdf)

Original File Name: 2013 12 12 HDOH Comments on CARB H-D Rulemaking Package.pdf

Date and Time Comment Was Submitted: 2013-12-10 13:42:01

No Duplicates.

**Comment 13 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Michael

Last Name: Tunnell

Email Address: mtunnell@trucking.org

Affiliation: American Trucking Associations

Subject: Comments on Proposed GHG Regulations et al.

Comment:

Attached

Attachment: [www.arb.ca.gov/lists/com-attach/20-hdghg2013-VTYBaABsUW8BYgFv.pdf](http://www.arb.ca.gov/lists/com-attach/20-hdghg2013-VTYBaABsUW8BYgFv.pdf)

Original File Name: Comments of the American Trucking Associations.pdf

Date and Time Comment Was Submitted: 2013-12-11 09:45:08

No Duplicates.

**Comment 14 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Tracey

Last Name: Norberg

Email Address: [tnorberg@rma.org](mailto:tnorberg@rma.org)

Affiliation: Rubber Manufacturers Association

Subject: Please see attached

Comment:

Please see attached comments of the Rubber Manufacturers Association. Thank you, Tracey Norberg

Attachment: [www.arb.ca.gov/lists/com-attach/22-hdghg2013-UiBXPFc3BwsBawNm.pdf](http://www.arb.ca.gov/lists/com-attach/22-hdghg2013-UiBXPFc3BwsBawNm.pdf)

Original File Name: RMA letter ARB 12-11-13.pdf

Date and Time Comment Was Submitted: 2013-12-11 10:20:21

No Duplicates.



**Comment 15 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Adam  
Last Name: Harper  
Email Address: aharper@calcima.org  
Affiliation: CalCIMA

Subject: HDGHG - Opposition Extended Compliance Obligations -idling rule  
Comment:

Attached please find our comments on the referenced item.

Attachment: [www.arb.ca.gov/lists/com-attach/24-hdghg2013-UDNXMAFsBTUFaU4.pdf](http://www.arb.ca.gov/lists/com-attach/24-hdghg2013-UDNXMAFsBTUFaU4.pdf)

Original File Name: CalCIMA comments.pdf

Date and Time Comment Was Submitted: 2013-12-11 10:40:37

No Duplicates.

**Comment 16 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Chris

Last Name: Shimoda

Email Address: cshimoda@caltrux.org

Affiliation: California Trucking Association

Subject: CTA Comments

Comment:

Please see the attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/26-hdghg2013-VjUAclY2AAxXYAk7.pdf](http://www.arb.ca.gov/lists/com-attach/26-hdghg2013-VjUAclY2AAxXYAk7.pdf)

Original File Name: CTA 12122013 Rulemaking Comments.pdf

Date and Time Comment Was Submitted: 2013-12-11 11:17:03

No Duplicates.

**Comment 17 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Colby

Last Name: Morrow

Email Address: [clmorrow@semprautilities.com](mailto:clmorrow@semprautilities.com)

Affiliation: SoCalGas

Subject: Optional low-NOx emission standards for heavy duty engines

Comment:

I apologize if this is a duplicate submittal. It was unclear if my previous attempt to send our comment letter was successful. Thank you very much - Colby Morrow

Attachment: [www.arb.ca.gov/lists/com-attach/27-hdghg2013-VGVdaVxwUzEANwEs.pdf](http://www.arb.ca.gov/lists/com-attach/27-hdghg2013-VGVdaVxwUzEANwEs.pdf)

Original File Name: 12-11-13 SoCalGas OLNS 45-day Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-12-11 11:51:10

No Duplicates.

**Comment 18 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Amy

Last Name: Kopin

Email Address: amy.kopin@daimler.com

Affiliation:

Subject: Daimler Trucks North America - Comments on GHG Regulations and Proposed Ultra-low NOx

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/28-hdghg2013-UTVdL1c4UWMFXARx.doc](http://www.arb.ca.gov/lists/com-attach/28-hdghg2013-UTVdL1c4UWMFXARx.doc)

Original File Name: DTNA ultra-low NOx Comments final 12-11-13.doc

Date and Time Comment Was Submitted: 2013-12-11 11:53:56

No Duplicates.

**Comment 19 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 45 Day.**

First Name: Ira

Last Name: Dassa

Email Address: idassa@nwttech.com

Affiliation:

Subject: Proposed Optional Low NOx Standards

Comment:

Attached is our comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/29-hdghg2013-Am1dK1UgBz0KYwNt.pdf](http://www.arb.ca.gov/lists/com-attach/29-hdghg2013-Am1dK1UgBz0KYwNt.pdf)

Original File Name: Optional Low NOx Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-12-11 11:58:53

No Duplicates.

**Comment 1 for Heavy-Duty GHG Phase 1 2013 (hdghg2013). (At Hearing)**

First Name: Darin

Last Name: Jeffries

Email Address: djeffries@genprod.com

Affiliation:

Subject: General Production Service, Inc.

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/31-hdghg2013-VDBSNQZ1V20GbiUK.pdf](http://www.arb.ca.gov/lists/com-attach/31-hdghg2013-VDBSNQZ1V20GbiUK.pdf)

Original File Name: Darin Jeffries.pdf

Date and Time Comment Was Submitted: 2013-12-12 15:42:27

No Duplicates.

**Comment 2 for Heavy-Duty GHG Phase 1 2013 (hdghg2013). (At Hearing)**

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation:

Subject: Proposed GHG Regulation Changes

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/32-hdghg2013-Uz4CbVw+AjlSNVcy.pdf](http://www.arb.ca.gov/lists/com-attach/32-hdghg2013-Uz4CbVw+AjlSNVcy.pdf)

Original File Name: Michael Lewis.pdf

Date and Time Comment Was Submitted: 2013-12-12 15:42:27

No Duplicates.

## **Comment 1 for Heavy-Duty GHG Phase 1 2013 (hdghg2013) - 15-1.**

First Name: Harold

Last Name: Garabedian

Email Address: harold.garabedian@gmail.com

Affiliation:

Subject: Comments on Proposed Amendments to S2485

Comment:

Attached herein are comments submitted to the record of the proposed amendments to Title 13, CCR, Section 2485.

Thank you for your time and considerations and this opportunity to contribute to the rule adoption process.

Attachment: [www.arb.ca.gov/lists/com-attach/34-hdghg2013-Wz5WNVY2WFRSNwBv.zip](http://www.arb.ca.gov/lists/com-attach/34-hdghg2013-Wz5WNVY2WFRSNwBv.zip)

Original File Name: EEA Comments on CA S2485 11 June 2014.ZIP

Date and Time Comment Was Submitted: 2014-06-11 11:20:35

No Duplicates.