

From: Sean Edgar
To: [ARB Clerk of the Board](#)
Subject: Agenda Item 18-8-6: October 25 Board Meeting
Date: Monday, October 22, 2018 5:10:03 PM
Attachments: [CleanFleets Coalition comments 10-22-18se.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I noted a message on the ARB website of a problem with uploading so I am attaching these comments and request you provide them to the Board.

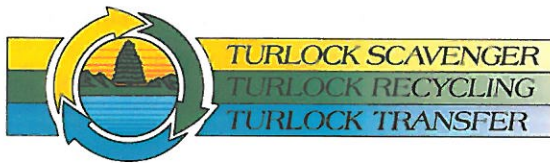
Thanks
Sean

Sean Robledo Edgar
Clean Fleets.net
1822 21st Street
Sacramento, CA 95811
916-520-6040 Ext 104

CALMET SERVICES, INC.

SOUTH SAN FRANCISCO
SCAVENGER
COMPANY, INC.

BLUE LINE
TRANSFER, INC.



MarBorg
INDUSTRIES



October 22, 2018

California Air Resources Board Members
1001 I Street, Sher Auditorium
Sacramento, CA 95814

Re: **Agenda Item 18-8-6 (10/25/18):**
REFUSE INDUSTRY WILL SUPPORT IF AMENDED-Proposed Fiscal Year 2018-19 Funding Plan for
Clean Transportation Incentives (Relating to the Hybrid Voucher Incentive Program, or "HVIP")

Chair Nichols and Board Members:

The signatories to this letter operate and maintain refuse and recycling collection vehicles from Sacramento to San Diego and nearly all counties in between. We are environmental stewards in our recycling operations and we were the first privately operated fleet to accept the challenges and embrace the changes under your Board's Diesel Risk Reduction Plan adopted in September 2000. We consider ourselves pioneers in deploying the more costly natural gas engines and most of us have benefitted from the Hybrid Voucher Incentive Program (HVIP) because it enables us to do early replacement of our aging diesel vehicle fleet in a streamlined fashion.

Our objection: The plan before you states, “[s]taff is proposing to discontinue offering a voucher for the purchase of new refuse trucks.” We cannot support because it eliminates the option for us to obtain the Low NOx “near-zero” 8.9-liter engine incentive when we purchase new vehicles. During the past year the refuse industry has had a leading role in deploying hundreds of these engines and could not have done so in the same quantity without HVIP.

Why we cannot support: The staff proposal only allows funding for repowering an existing refuse truck which is both uncommon and unlikely to stimulate further HVIP participation. Among the limitations we experience when evaluating a repower are:

- Physical space-not all existing low cab forward (i.e. “cabover”) can accommodate the Low NOx engine;
- Chassis age-a typical vehicle replacement cycle is 10 to 15 years. For a severe service vehicle like ours that is evaluating a repower anytime after 5 years there may be cab or body system problems that would trigger the concern that a brand new engine may exceed the useful life of the truck itself;
- Repower cost-in our experience the total cost of repowering to Low NOx engine (if physically possible) will be in the range of \$75,000 to \$100,000 when the cost of tanks are included. Even with the proposed incentive of \$45,000 this would not be attractive for the reasons mentioned.

What we need to support: With more than 8,000 refuse vehicles statewide continuing to run on diesel, our companies respectfully request flexibility on funding both purchase and repower using the 8.9-liter engine in communities where we can run CNG or LNG like your staff has allowed for the 12-liter engine that is eligible for HVIP.

What we want from the Board: HVIP (and all the Board’s actions for that matter) are most successful when the Board and the target fleets are aligned which is clearly not the case in this matter. If the Board desires deeper penetration of “near zero” engines in the communities we serve we will be your partners in that endeavor. If Board staff continues to pursue its analysis about the clean transportation future of our industry in a vacuum without consultation from our industry players it will reduce the air quality contributions we can make and short-circuit the collaboration that has survived nearly 20 years of a productive relationship that has measurable benefits to the environment.

We welcome further discussion at our email addresses listed in our signature block and also with our colleague Sean Edgar (email Service@CleanFleets.net).

Sincerely,

PLEASE SEE ATTACHED SIGNATURE PAGES

October 23, 2018
California Air Resources Board Members
Agenda Item 18-8-6

I am in support of the Refuse Industry letter requesting flexibility on funding both purchase and repower using the 8.9-liter engine.

Sincerely,

A handwritten signature in black ink, appearing to be 'JP' with a stylized flourish.

Jacob Panero
Chief Executive Officer
Varner Bros., Inc.
P.O. Box 80427
Bakersfield, CA 93380

CALMET SERVICES, INC.

October 23, 2018
California Air Resources Board Members
Agenda Item 18-8-6

I am in support of the Refuse Industry letter requesting flexibility on funding both purchase and repower using the 8.9-liter engine.

Sincerely,

Gabriel Kalpakoff
Manager
Calmet Services, Inc.
gkalpakoff@calmetservices.com

BLUE LINE TRANSFER, INC.

October 23, 2018
California Air Resources Board Members
Agenda Item 18-8-6

I am in support of the Refuse Industry letter requesting flexibility on funding both purchase and repower using the 8.9 liter engine.

Sincerely,



John Rossi

Fleet Manager

Blue Line Transfer Inc.

johnr@ssfscavenger.com

PO Box 348 • 500 East Jamie Court • South San Francisco, CA 94083-0348

W: (650) 589-0417 • F: (650) 589-2907 • e: info@ssfscavenger.com • web: www.ssfscavenger.com

October 23, 2018
California Air Resources Board Members
Agenda Item 18-8-6

I am in support of the Refuse Industry letter requesting flexibility on funding both purchase and repower using the 8.9-liter engine.

Sincerely,

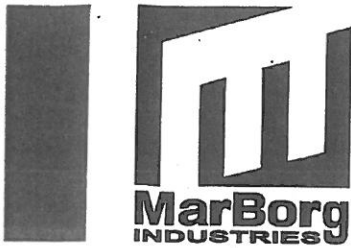
A handwritten signature in black ink, appearing to read "Doug Button", with a large, stylized flourish extending to the right.

Doug Button

President

South San Francisco Scavenger Co. Inc.

dougb@ssfscavenger.com



October 23, 2018
California Air Resources Board Members
Agenda Item 18-8-6

I am in support of the Refuse Industry letter requesting flexibility on funding both purchase and repower using the 8.9-liter engine.

Sincerely,

A handwritten signature in cursive script that reads 'Brian Borgatello'.

Brian D. Borgatello

President

MarBorg Industries

bborgatello@marborg.com



October 23, 2018
California Air Resources Board Members
Agenda Item 18-8-6

I am in support of the Refuse Industry letter requesting flexibility on funding both purchase and repower using the 8.9-liter engine.

Sincerely,

A handwritten signature in black ink that reads "Alan Marchant". The signature is written in a cursive, flowing style.

President
Turlock Scavenger, Recycling, Transfer
amarchant@turlockscavenger.com

E.J. Harrison & Sons, Inc.



October 19, 2018

California Air Resources Board Members
1001 I Street, Sher Auditorium
Sacramento, California 95814

SUBJECT: Agenda Item 18-8-6 (10/25/18)

Dear Chair Nichols and Board Members:

We support the Refuse Industry letter requesting flexibility on funding both purchase and repower using the 8.9-liter engine.

Sincerely,

E.J. Harrison & Sons, Inc.

A handwritten signature in black ink, appearing to read 'MH'.

Mike Harrison, P.E.
Engineering Manager
(mikeh@ejharrison.com)



14048 Valley Blvd.
P.O. Box 60009
City of Industry, CA 91716-0009
Fax (626) 330-4686
(626) 336-3636

October 23, 2018

California Air Resources Board Members
1001 I Street, Sher Auditorium
Sacramento, CA 95814

Re: **Agenda Item 18-8-6 (10/25/18):**
REFUSE INDUSTRY WILL SUPPORT IF AMENDED-Proposed Fiscal Year 2018-19 Funding Plan for Clean Transportation Incentives (Relating to the Hybrid Voucher Incentive Program, or "HVIP")

Chair Nichols and Board Members:

The signatories to this letter operate and maintain refuse and recycling collection vehicles from Sacramento to San Diego and nearly all counties in between. We are environmental stewards in our recycling operations and we were the first privately operated fleet to accept the challenges and embrace the changes under your Board's Diesel Risk Reduction Plan adopted in September 2000. We consider ourselves pioneers in deploying the more costly natural gas engines and most of us have benefitted from the Hybrid Voucher Incentive Program (HVIP) because it enables us to do early replacement of our aging diesel vehicle fleet in a streamlined fashion.

Our objection: The plan before you states, "[s]taff is proposing to discontinue offering a voucher for the purchase of new refuse trucks." We cannot support because it eliminates the option for us to obtain the Low NOx "near-zero" 8.9-liter engine incentive when we purchase new vehicles. During the past year the refuse industry has had a leading role in deploying hundreds of these engines and could not have done so in the same quantity without HVIP.

Why we cannot support: The staff proposal only allows funding for repowering an existing refuse truck which is both uncommon and unlikely to stimulate further HVIP participation. Among the limitations we experience when evaluating a repower are:

- Physical space-not all existing low cab forward (i.e. "cabover") can accommodate the Low NOx engine;
- Chassis age-a typical vehicle replacement cycle is 10 to 15 years. For a severe service vehicle like ours that is evaluating a repower anytime after 5 years there may be cab or body system problems that would trigger the concern that a brand new engine may exceed the useful life of the truck itself;
- Repower cost-in our experience the total cost of repowering to Low NOx engine (if physically possible) will be in the range of \$75,000 to \$100,000 when the cost of tanks are included. Even with the proposed incentive of \$45,000 this would not be attractive for the reasons mentioned.

What we need to support: With more than 8,000 refuse vehicles statewide continuing to run on diesel, our companies respectfully request flexibility on funding both purchase and repower using the 8.9-liter engine in communities where we can run CNG or LNG like your staff has allowed for the 12-liter engine that is eligible for HVIP.

What we want from the Board: HVIP (and all the Board's actions for that matter) are most successful when the Board and the target fleets are aligned which is clearly not the case in this matter. If the Board desires deeper penetration of "near zero" engines in the communities we serve we will be your partners in that endeavor. If Board staff continues to pursue its analysis about the clean transportation future of our industry in a vacuum without consultation from our industry players it will reduce the air quality contributions we can make and short-circuit the collaboration that has survived nearly 20 years of a productive relationship that has measurable benefits to the environment.

We welcome further discussion at our email addresses listed in our signature block and also with our colleague Sean Edgar (email Service@CleanFleets.net).

October 23, 2018
California Air Resources Board Members
Agenda Item 18-8-6

I am in support of the Refuse Industry letter requesting flexibility on funding both purchase and repower using the 8.9-liter engine.

Sincerely, Marty Mitchell



Director of Maintenance
Athens Services
Email MMitchell@athensservices.com
626-336-3636

SOUTH SAN FRANCISCO
SCAVENGER
COMPANY, INC.

October 23, 2018

California Air Resources Board Members
1001 I Street, Sher Auditorium
Sacramento, CA 95814

Re: **Agenda Item 18-8-6 (10/25/18):**
REFUSE INDUSTRY WILL SUPPORT IF AMENDED-Proposed Fiscal Year 2018-19 Funding Plan for
Clean Transportation Incentives (Relating to the Hybrid Voucher Incentive Program, or "HVIP")

Chair Nichols and Board Members:

The signatories to this letter operate and maintain refuse and recycling collection vehicles from Sacramento to San Diego and nearly all counties in between. We are environmental stewards in our recycling operations and we were the first privately operated fleet to accept the challenges and embrace the changes under your Board's Diesel Risk Reduction Plan adopted in September 2000. We consider ourselves pioneers in deploying the more costly natural gas engines and most of us have benefitted from the Hybrid Voucher Incentive Program (HVIP) because it enables us to do early replacement of our aging diesel vehicle fleet in a streamlined fashion.

Our objection: The plan before you states, "[s]taff is proposing to discontinue offering a voucher for the purchase of new refuse trucks." We cannot support because it eliminates the option for us to obtain the Low NOx "near-zero" 8.9-liter engine incentive when we purchase new vehicles. During the past year the refuse industry has had a leading role in deploying hundreds of these engines and could not have done so in the same quantity without HVIP.

Why we cannot support: The staff proposal only allows funding for repowering an existing refuse truck which is both uncommon and unlikely to stimulate further HVIP participation. Among the limitations we experience when evaluating a repower are:

- Physical space-not all existing low cab forward (i.e. "cabover") can accommodate the Low NOx engine;
- Chassis age-a typical vehicle replacement cycle is 10 to 15 years. For a severe service vehicle like ours that is evaluating a repower anytime after 5 years there may be cab or body system problems that would trigger the concern that a brand new engine may exceed the useful life of the truck itself;

500 East Jamie Court • South San Francisco, CA 94080

V: 650.589.4020 • F: 650.589.7385 • e: info@ssfscavenger.com • webs: www.ssfscavenger.com

- Repower cost-in our experience the total cost of repowering to Low NOx engine (if physically possible) will be in the range of \$75,000 to \$100,000 when the cost of tanks are included. Even with the proposed incentive of \$45,000 this would not be attractive for the reasons mentioned.

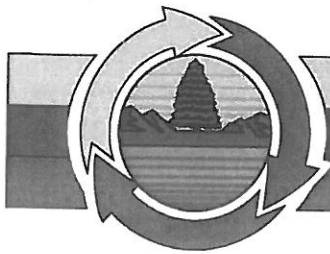
What we need to support: With more than 8,000 refuse vehicles statewide continuing to run on diesel, our companies respectfully request flexibility on funding both purchase and repower using the 8.9-liter engine in communities where we can run CNG or LNG like your staff has allowed for the 12-liter engine that is eligible for HVIP.

What we want from the Board: HVIP (and all the Board's actions for that matter) are most successful when the Board and the target fleets are aligned which is clearly not the case in this matter. If the Board desires deeper penetration of "near zero" engines in the communities we serve we will be your partners in that endeavor. If Board staff continues to pursue its analysis about the clean transportation future of our industry in a vacuum without consultation from our industry players it will reduce the air quality contributions we can make and short-circuit the collaboration that has survived nearly 20 years of a productive relationship that has measurable benefits to the environment.

We welcome further discussion at our email addresses listed in our signature block and also with our colleague Sean Edgar (email Service@CleanFleets.net).

Sincerely,

PLEASE SEE ATTACHED SIGNATURE PAGES



TURLOCK SCAVENGER
TURLOCK RECYCLING
TURLOCK TRANSFER

October 23, 2018

California Air Resources Board Members
1001 I Street, Sher Auditorium
Sacramento, CA 95814

Re: **Agenda Item 18-8-6** (10/25/18):
REFUSE INDUSTRY WILL SUPPORT IF AMENDED-Proposed Fiscal Year 2018-19
Funding Plan for Clean Transportation Incentives (Relating to the Hybrid Voucher
Incentive Program, or "HVIP")

Chair Nichols and Board Members:

The signatories to this letter operate and maintain refuse and recycling collection vehicles from Sacramento to San Diego and nearly all counties in between. We are environmental stewards in our recycling operations and we were the first privately operated fleet to accept the challenges and embrace the changes under your Board's Diesel Risk Reduction Plan adopted in September 2000. We consider ourselves pioneers in deploying the more costly natural gas engines and most of us have benefitted from the Hybrid Voucher Incentive Program (HVIP) because it enables us to do early replacement of our aging diesel vehicle fleet in a streamlined fashion.

Our objection: The plan before you states, "[s]taff is proposing to discontinue offering a voucher for the purchase of new refuse trucks." We cannot support because it eliminates the option for us to obtain the Low NOx "near-zero" 8.9-liter engine incentive when we purchase new vehicles. During the past year the refuse industry has had a leading role in deploying hundreds of these engines and could not have done so in the same quantity without HVIP.

Why we cannot support: The staff proposal only allows funding for repowering an existing refuse truck which is both uncommon and unlikely to stimulate further HVIP participation. Among the limitations we experience when evaluating a repower are:

- Physical space-not all existing low cab forward (i.e. "cabover") can accommodate the Low NOx engine;
- Chassis age-a typical vehicle replacement cycle is 10 to 15 years. For a severe service vehicle like ours that is evaluating a repower anytime after 5 years there may be cab or body system problems that would trigger the concern that a brand new engine may exceed the useful life of the truck itself;
- Repower cost-in our experience the total cost of repowering to Low NOx engine (if physically possible) will be in the range of \$75,000 to \$100,000 when the cost of tanks are included. Even with the proposed incentive of \$45,000 this would not be attractive for the reasons mentioned.

P.O. Box 1865 • Turlock, CA 95381-1865
RECYCLING • (209) 668-6060 • FAX (209) 668-7496
SCAVENGER • (209) 668-7274 • FAX (209) 668-6064
TRANSFER • (209) 668-6049 • FAX (209) 668-7496

What we need to support: With more than 8,000 refuse vehicles statewide continuing to run on diesel, our companies respectfully request flexibility on funding both purchase and repower using the 8.9-liter engine in communities where we can run CNG or LNG like your staff has allowed for the 12-liter engine that is eligible for HVIP.

What we want from the Board: HVIP (and all the Board's actions for that matter) are most successful when the Board and the target fleets are aligned which is clearly not the case in this matter. If the Board desires deeper penetration of "near zero" engines in the communities we serve we will be your partners in that endeavor. If Board staff continues to pursue its analysis about the clean transportation future of our industry in a vacuum without consultation from our industry players it will reduce the air quality contributions we can make and short-circuit the collaboration that has survived nearly 20 years of a productive relationship that has measurable benefits to the environment.

We welcome further discussion at our email addresses listed in our signature block and also with our colleague Sean Edgar (email Service@CleanFleets.net).

Sincerely,

A handwritten signature in black ink that reads "Alan Marchant". The signature is written in a cursive, slightly slanted style.