



May 21, 2018

California Air Resources Board
1001 I Street
Sacramento CA 95814

Re: Comments of the American Trucking Associations on the Proposed Amendments to the Heavy-Duty Vehicle Inspection Program and Periodic Smoke Inspection Program

(Submitted Electronically: <http://www.arb.ca.gov/lispub/comm/bclist.php>)

Dear Chair Nichols and Members of the Board:

The American Trucking Associations (ATA) appreciate the opportunity to comment on the California Air Resources Board's Proposed Amendments to the Heavy-Duty Vehicle Inspection Program and Periodic Smoke Inspection Program (PSIP) posted on April 3, 2018. ATA is the national trade association that represents the U.S. trucking industry and is a united federation of motor carriers, 50 state trucking associations, and national trucking conferences created to promote and protect the interests of the trucking industry.

ATA member companies may be subject to these inspection programs while their vehicles are traveling in the state or as a result of having vehicles registered in California. Based on our understanding of the proposed amendments, our expectation is that properly-maintained vehicles will pass the revised opacity limits and access to the newly mandated training will be readily available to fleet personnel. Consequently, our primary area of concern centers on the new reporting requirement for fleets subject to PSIP. As discussed below, this type of reporting has not been effective in deterring noncompliance. ***We ask the Board to remove the reporting requirements from the proposed amendments and direct staff to work with regulated parties to identify a more effective, less costly solution that will not further disadvantage fleets that are making efforts to comply.***

(1) Reporting requirements have not been effective.

The type of reporting being proposed is similar to that being used for the Truck and Bus Rule. As noted in the most recent enforcement report, 30% of vehicles are estimated to be out of compliance with that regulation. However, as noted in the report and included as an attachment to this letter, noncompliance rates among certain fleet categories are estimated to be as much as 50%, equal to the noncompliance estimate for PSIP with its current record retention requirement.

In 2017, legislation was passed to move away from using this type of reporting for the Truck and Bus Rule. As noted in the staff report, "Implementation of SB 1 is expected to play a critical role in improving the Truck and Bus Rule compliance rate and substantially reduce in-use emissions..."

As proposed, fleets subject to PSIP will be asked to spend from \$2.7 to \$5.3 million annually to electronically report test results for more than one-half million vehicles. This is expected to decrease noncompliance to 30% and lead to approximately 2,500 additional repairs in 2022 and approximately 1,300 total repairs annually thereafter, or 0.5% to 0.3% of all vehicles being reported. Overall emission reductions are projected to be roughly 0.3 tons per day of PM2.5 after 2023. By comparison, the Truck and Bus Regulation is expected to provide reductions of roughly 3 tons per day of PM2.5 plus additional NOx reductions in 2023 (TB14ISOR Table II-1).

Given these numbers, the agency's limited enforcement capabilities, and pending efforts to develop a more robust inspection and maintenance program for trucks, it is difficult to justify the cost-benefit of the newly proposed reporting requirements. Instituting this type of reporting to identify vehicles with excessive exhaust emissions will likely continue to be ineffective. Instead, this type of reporting will simply add costs for compliant companies while a large percentage of fleets avoid these costs through noncompliance and continued non-detection. ATA member companies would like to see their resources, as well as those of the agency, spent in a manner that provides a more level playing field.

The Board's consideration of and action on these comments would be appreciated.

Sincerely,



Michael Tunnell
Director, Energy & Environmental Affairs
American Trucking Associations

Attachment

Appendix I
2016 Diesel Programs Compliance Calculations (continued)

As of 2016, all engines in heavier vehicles (exceeding 26,000 pounds gross vehicle weight rating) which are not equipped with a diesel particulate filter must register in the Truck and Bus Registration, Upload, and Compliance Reporting System (TRUCRS), which is maintained by ARB.

Table I-5 Heavier Truck Compliance Rates

	Total	Total Heavies	Total Heavies	Total Heavies	*Total Heavies	*Total Heavies	*Total Heavies	
			Pre 2008	Pre 2008	Pre 2008 in a	Pre 2008 in a Non	Pre 2008 in	Compliance
Reg. Type	Heavies	Pre 2008	Not in TRUCRS	In TRUCRS	Compliant Fleet	Compliant Fleet	Unknown Status	Rate (%)
CA Reg. Fleet Size 1-3	58,181	36,217	28,085	8,132	4,670	885	2,577	50
CA Reg. Fleet Size 4-20	51,590	29,947	18,040	11,907	5,727	1,922	4,258	61
CA Reg. Fleet Size 21-100	38,341	19,474	10,793	8,681	4,091	1,863	2,727	67
CA Reg. Fleet Size > 100	43,045	19,278	13,604	5,674	3,933	1,471	270	65
CA Reg. In-State Totals	191,157	104,916	70,522	34,394	18,421	6,141	9,832	60
CA IRP Fleet Size 1-3	27,545	8,321	5,921	2,400	1,242	161	997	78
CA IRP Fleet Size 4-20	21,486	5,075	2,873	2,202	1,020	221	961	86
CA IRP Fleet Size 21-100	13,785	2,524	1,104	1,420	806	338	276	90
CA IRP Fleet Size > 100	9,154	1,740	971	769	214	103	452	88
CA IRP Totals	71,970	17,660	10,869	6,791	3,282	823	2,686	84
Totals In state and IRP	263,127	122,576	81,391	41,185	21,703	6,964	12,518	66
IRP (not including CA)	965,029	291,339	286,225	5,114	2,686	1,118	1,310	70
Grand Totals	1,228,156	413,915	367,616	46,299	24,389	8,082	13,828	69

Source: California Air Resources Board, 2016 Enforcement Report (June 2017).