



September 21, 2022

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Section 2015 of Title 13, California Code of Regulations

To Whom it May Concern:

Cascade Environmental, LLC (hereafter Cascade) and its subsidiary Companies hereby respectfully request additions to the exempted vehicles listed in Section 2015 (c).

Background: Cascade performs water, geotechnical and environmental drilling, and soil remediation throughout the United States, including California. Cascade operates drilling rigs and support trucks to perform this work, these units are licensed and permitted to operate on a public roadways. Off road equipment that includes track drilling rigs and support equipment are also permitted under DOOR's and used for rough terrain and or harder to reach locations. A majority of Cascade on road drilling rigs operate using a Power Take Off (PTO), which requires the use of the trucks engine to operate the rig. In addition, drill rigs, development rigs and environmental remediation platforms require support equipment which includes a variety of trucks and specialty equipment.

Cascade performs work in many remote areas, and in some cases, for extended periods of time with both the rigs and support trucks. Additionally, trucks and rigs in California provide support to locations outside of California, again, including very remote sites. Many of these sites do not have power nor the infrastructure to support electric trucks.

Electric support vehicles and truck mounted drill rigs and related equipment to construct wells or remediate soils would not be functional for Cascade due to length of projects, and remote work sites in which there is no power or way to charge the rig or support equipment.

Recommendation: Cascade understands the intent of the rule, reducing diesel emissions. However, due to the work Cascade performs, the applicability to companies such as Cascade would provide limited reduction in diesel emissions, and charging would not be possible in many cases.

Cascade therefore is requesting some additional exemptions to be able to perform services in California. Cascade recommends adding the following exemptions:

“(c) Exemptions. The following entities and vehicles are exempt from the requirements of sections 2015 through 2015.6: “

(12) Drilling, well development and environmental remediation rigs, including their support trucks (Flatwater, Flatbed, Pick-ups, and Boxed);

(13) Diesel trucks which drive less than 10,000 miles a year in California;



- (14) All Power Take Off (PTO) operated trucks/equipment;
- (15) Membrane Interface Probe Vans and other specialized vans with built in equipment not designed to transport products.

Thank you for your consideration of the above recommendations.

Sincerely,

Alexander Amort
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