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568 South Commerce Drive
Grand Junction, CO 81505
(970) 245-0039

November 29, 2021

Clerks Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions

Dear California Air Resources Board:

Thank you for the opportunity to provide written comments on the California Air Resources Board's ("CARB") "Proposed Amendments to the Small Off-Road Engine Regulations: Transmission to Zero Emissions" ("Proposed Amendments"). The Proposed Amendments would modify the preexisting Small Off-Road Engine Exhaust Emission Regulations, Off-Road Vehicles and Engines Pollution Control Devices and the Small Off-Road Engine Evaporative Emission Regulations, Evaporative Emissions Requirements for Off-Road Equipment ("SORE Regulations").

For the purposes of the Proposed Amendments and the SORE Regulations, our comments reflect the perspective and product scope of Royce Industries L.C. and Custom Industries ("Royce") which distributes, among other items, certain Industrial Pressure Washer equipment that contains small gas-powered engines of less than 25 horsepower (432cc). Royce has been serving the 11 Western States for nearly 38 years with current brick and mortar operations in Utah, Nevada, Idaho, and Colorado. Furthermore, with goals of expanding our operations into California. Royce is encouraged by CARB's leadership and supports the goal of reducing SORE equipment emissions. We strongly believe that "as goes California so goes the Country".

However, mandating the use of Zero-Emission Equipment especially Industrial Pressure Washer's for model year 2024 and all subsequent model years is unreasonable. Industrial Pressure Washers (generally with horsepower of 10HP - 25HP) require a great deal of energy to conserve water and labor which cannot be done with battery technology. A small part of Industrial Pressure Washers could be replaced with higher voltage (230 Volt, Single or 3 Phase), however hooking up to these power sources for a contractor poses many safety risks to the contractor and the public in the limited number of places that options would work.

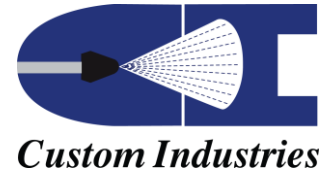
The majority of Industrial Pressure Washers are used in applications and remote locations where high voltage is simply not available.

Therefore, we respectfully request that Industrial Pressure Washers be EXEMPTED from the Consideration for Inclusion in the Proposed Regulatory Amendments dated October 15, 2021

Respectfully Submitted,

R Calvin Rasmussen
Chief Executive Officer

PS: To further demonstrate "The majority of Industrial Pressure Washers are used in applications and remote locations where high voltage is simply not available", let me share with you on the following pages some specifics for your consideration.



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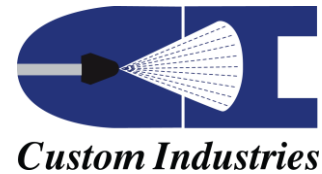
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Fire Management - Invasive Plant Mitigation requires the use of Industrial Pressure Washers:





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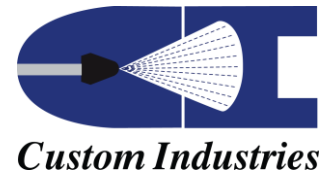
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Aquatic Invasive Species ("AIS") Watercraft Inspection and Decontamination requires the use of Industrial Pressure Washers:





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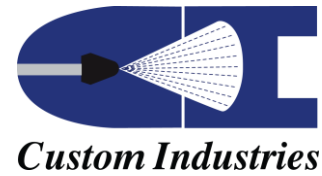
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Cleaning-Up Homeless Encampments requires the use of Industrial Pressure Washers:



Railroad related cleaning needs require the use of Industrial Pressure Washers:





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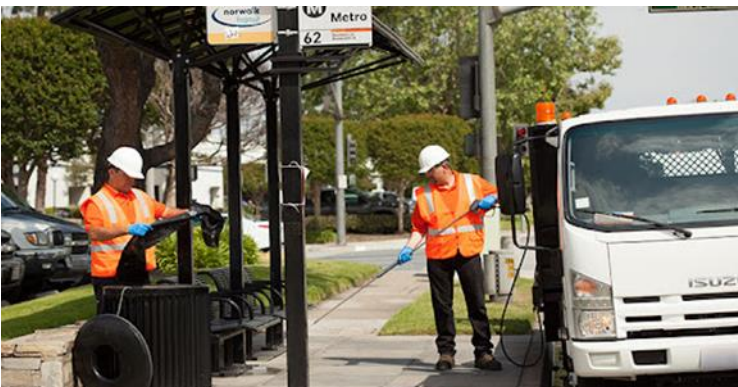
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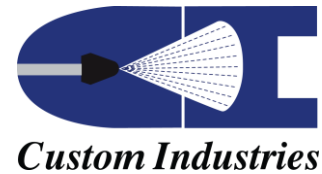
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Cleaning and Disinfecting Parks and Public Areas requires the use of Industrial Pressure Washers:





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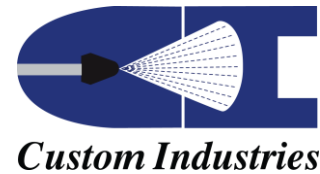
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Solar Farm cleaning needs require the use of Industrial Pressure Washers:



Graffiti Removal and Abatement requires the use of Industrial Pressure Washers:





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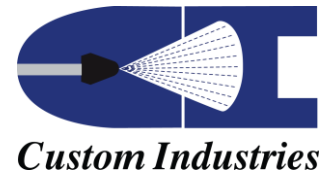
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Construction related cleaning needs require the use of Industrial Pressure Washers:

- Bulldozers
- Cranes
- Tracked Equipment
- Trenchers
- Trash Containers
- Drains and Pipes
- Rock Haulers
- Cement Mixers
- Backhoes
- Fences
- Cooling Towers
- Air Handlers
- Kilns
- Driveways
- Brick Mfg.
- Paint Preparation
- Parking Lots
- Concrete Forms
- Machinery
- Holding Tanks
- Floors
- Safety Equipment
- Forklifts
- Radiators
- Front-End Loaders
- Cargo Holds
- Land Movers
- Drilling Equipment
- Asphalt Equipment
- Scaffolding
- Hole Boring
- Landscaping
- Hydraulic Leak Detection





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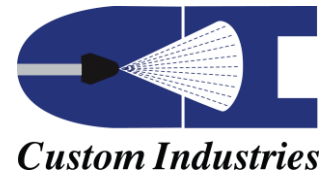
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Fleet cleaning needs require the use of Industrial Pressure Washers:

- Aluminum Trailers
- Wheels
- Tires
- Radiator Grill
- Hydraulic Lever
- Windows, Mirrors
- Fifth Wheel
- Undercarriage
- Engine Block
- Trailer Interior
- Lamps and Lights
- Refrigeration Units
- Trailer Floor
- Tractor Cab
- Paint Preparation
- Cement Mixer Tub
- Washouts
- Trash Receptacle
- Chrome Trim
- Vehicle signage
- Fuel Tanks
- Cargo Hold
- Exhaust Stack
- Bucket Trucks
- Asphalt Removal
- Lift Gates
- Tow Equipment
- Tool, Saddle Boxes
- Ladders, Racks
- Booms, Cranes
- Power Hitches
- Sleeper Cabs





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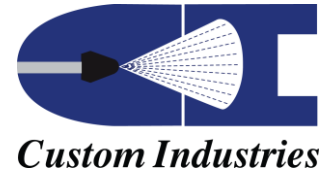
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Agriculture related cleaning needs require the use of Industrial Pressure Washers:

- Milking Parlors
- Milk Stone
- Barns
- Tractors
- Plows
- Gutters
- Gleaners
- 8.Trucks
- Walkways
- Decks
- Cattle Pens
- Fences
- Pick-Ups
- Tanks
- Roofs
- Vents
- Driveways
- Silos
- Wagons
- Shed Floors
- Harvesters
- Greenhouses
- Machinery
- Service Areas
- Dumpsters
- Fans & Ducts
- Railings
- Storage Bins
- Farmhouse
- Out Buildings





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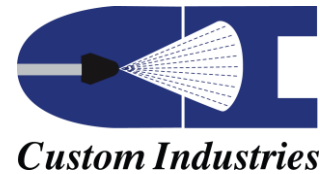
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Mining & Drilling related cleaning needs require the use of Industrial Pressure Washers:

- | | |
|-----------------------|--------------------------|
| 1. Mixing Augers | 17. Buckets, Forks |
| 2. Shotcrete Machines | 18. Wheels, Axles |
| 3. Drill Pipes | 19. Generators |
| 4. Scoop Trams | 20. Excavators |
| 5. Trans Mixers | 21. Belt Crawlers |
| 6. Muckers | 22. Storage Containers |
| 7. Shovel Loaders | 23. Mine Hoists |
| 8. Blocks, Hooks | 24. Winches, Tuggers |
| 9. Frac Tanks | 25. Well Booms |
| 10. Crew Houses | 26. Drills, Bits |
| 11. Elevator Links | 27. Crushers, Mills |
| 12. Rocker Shovel | 28. Rotary Tables, Tongs |
| 13. Drill Rigs | 29. Engines, Radiators |
| 14. Mucking Machines | 30. Heavy Equipment |
| 15. Haul Trailers | 31. Down Hole Tools |
| 16. Drill Cases | 32. Drawworks |





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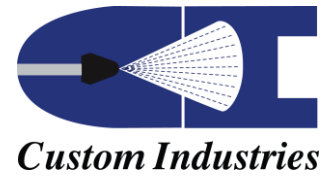
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Contract Cleaning Companies require the use of Industrial Pressure Washers:

- Swimming Pools
- Outdoor Furniture
- Dumpsters
- Docks
- Trash Containers
- Vehicles
- Exterior Walls
- Hoods and Vents
- Wheelchairs
- Fences
- Vats, Mixers
- Air Handlers
- Paint Removal
- Driveways
- Windows
- Service Areas
- Parking Lots
- Concrete Barriers
- Machinery
- Holding Tanks
- Floors
- Walkways
- Roof and Gutters
- Food Products
- Drains and Pipes
- Cargo Holds
- Fans and Ducts
- Trays and carts
- Turf Equipment
- Decks and Railings





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