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Proposal for Air Resources Board re: Construction Industry Low-Use Exemption

Increase Low Use Exemption Threshold for Construction Trucks to 15,000 miles per year

Definition of Construction Trucks

May include but are not limited to vehicles over 14,000 gross vehicle weight rating (GVWR) that are:

- Bucket lift truck
- Drill rigs
- Dual engine street sweepers (construction cleanup only)
- Dump trucks Single Body
- Dump trucks Tractor Units
- Support Trucks - Single Body (mechanics, fuel, lube, tire, welding, etc.)
- Water trucks
- Low-boy heavy transport
- Ready mix concrete
- Concrete pumps
- Single-engine mobile cranes
- Trucks equipped with a Power Take-Off (PTO) unit – i.e. ready mixed concrete mixer, concrete pumping trucks, single-engine cranes, etc. (PTO usage would be reported separately and allowed to not exceed 500 hours)
- Trucks outfitted with a service body (i.e. non-payload carrying) or specialized equipment—i.e. welding equipment mounted on the truck body, etc.
- Trucks operated in a fleet that includes off-road equipment—(i.e. trucks carrying counterweights and other components of an off-road crane; low-bed trucks used to deliver heavy equipment to a job site, etc.)
- Additional Miscellaneous Construction Truck Types*: Asphalt; Bridge inspection; Chip spreader; Digger derrick; Flatbed; Flusher; Highway specialty (cone, paint-stripper, sign, etc.); Knuckleboom; Hot Oil; Hydro Seeder; Platform lift; Reel carrier; Stone ejector; Sewer rodder; Sheet rock/wallboard; Snowplow; Spreader; Stake bed; Telebelt; Vacuum.

* Typically small populations of specialty trucks

Additional requirements to claim the exemption could include a contractor license or have equipment registered in the D.O.O.R.S. program; additional registration, reporting, for the vehicles in the low-use exemption category including vehicle model, age, horsepower and annual mileage.

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Among the considerations regarding this request would be the number, type and annual mileage of trucks qualifying for this exemption. We propose that the ARB grant a two-year compliance extension for fleets operating under this provision to allow time for complete registration and reporting by the regulated industry. This would settle the questions surrounding the potential emissions, size of the fleet, requirements of the rule and allow time for additional amendment if necessary.

We believe that ARB and the regulated industries should continue to work in a formally established group, based on mutual cooperation and collegial manner to implement and refine the provisions of this amendment to the on-road heavy-duty diesel truck rule.