



**NORTH AMERICAN POWER
SWEEPING ASSOCIATION**

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

RE: Response to changes in the On Road Bus and Truck Rule

The North American Power Sweeping Association (NAPSA) is the only national trade group representing the power sweeping industry. Our members include private sweeping companies, the manufacturers of their sweepers and the suppliers that support them. One hundred percent of our contractors are small or micro businesses.

Although our membership is evenly distributed throughout the country, the unique requirements of operating a small business according to CARB regulations have required the formation of a separate, dedicated California committee. This committee, which takes significant NAPSA resources, is dedicated solely to monitoring, reacting and planning compliance strategies for environmental laws in California.

In regards to the most recent changes, CARB staff recognized that a slowing of economic activity, caused in part by this very regulation, resulted in lower emissions. Protecting and enhancing the environment is critical. In fact, "enhancing the environment" is a crucial part of the NAPSA Mission Statement. But regulating productive equipment that is fundamentally designed to remove pollutants from our air and water to the point that it is not able to be used will have the unintended result of actually hurting the environment and will further reduce economic activity as more small businesses succumb to economic failure.

While NAPSA members outside of California theoretically will enjoy the purchase of quality, productive sweeper trucks from the California fleet at fire sale prices, the reduced trade-in value and forced retirement of productive equipment is already having a devastating effect on our California members. The reduced purchasing power and company shrinkage is also affecting our manufacturer members as well.

NAPSA is surprised construction sweepers were not included in the low mileage construction vehicle option. With a limit of only 9,000 trucks it is obvious, should construction activities actually increase, it will continue to be stifled by this arbitrary limit. Members have reported construction contractors limiting work crews because $\frac{3}{4}$ of their fleet sits idle due to this (and the off-



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road) regulation. This limitation of work crews will only get worse as compliance dates get closer.

NAPSA strongly encourages CARB to include construction street sweepers in the low mileage limits and remove the finite number of vehicles that can be included. This will not only help maintain the jobs of our members, but also the jobs of their customers.

Removing street sweepers from the street, when they are the only weapon against re-entrainment is counter intuitive. The only logical assumption is that these harsh regulations are based more on opinion and emotion than science, economics or reason. Street sweepers remove millions of tons of air and water pollutants from our environment every year. Even the oldest, so called "dirty" sweepers (which are perfectly acceptable across the state line) remove more pollutants than they produce. Making it more difficult to achieve this environmental benefit defies logic.

Street sweepers in California continue to be one of the most regulated vehicles in the state. A small sweeper fleet can easily be burdened by multiple local and multiple state emissions regulations. NAPSA strongly urges CARB to regulate and require reporting under a single rule. Even if utilizing PERP to avoid the requirements of the many and varied local jurisdictions, PERP is also burdensome and expensive in its own right. To be fair, street sweeper emission regulations should be the sole and exclusive purview of the On Road, Bus & Truck Rule and not subject to additional local and state rules, fees and reporting requirements.

For simplicity, NAPSA suggests allowing each street sweeper with an auxiliary engine above 50 hp. a no cost, lifetime registration in PERP. To avoid the current duplication, after the initial registration in PERP, all future reporting will be done under the On Road Bus and Truck Rule. While not perfect, this simple action places sweepers in one rule and if data is needed by PERP, they can easily request data from within CARB.

On behalf of our members, the environment, the California economy and its affect on the nation's economy, we look forward to a positive response to our comments and suggestions.

Sincerely,

Kevin Kroeger
President

