

June 3, 2011

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

RE: Comments on changes to the On Road Bus and Truck Rule

Members of the Air Resources Board:

As a member of the North American Power Sweeping Association California Chapter I have been working with CARB staff to develop a workable solution that would allow our industry to survive the On Road Truck and Bus Rule. The CARB staff has been courteous and professional. They have listened to our input and made a number of positive changes that were not easy or quick to accomplish. Staff has strived to understand our unique equipment and progressed significantly since we started this process.

There are, however, still quite a few areas that are either confusing or the new wording has changed the intent as it was explained. Follows are the items in question:

- Section 2025 (c) Exemptions (13) This is confusing as the auxiliary engine if below 50 hp is still excluded. Stating this plainly in this section avoids confusion and the need to repeat it in other sections.
- Section 2025 (d) (40) Low Mileage Construction Truck – Because street sweepers work construction all across California and are a major component for the remediation of fugitive dust, and for the same economic reasons as other constructions vehicles, construction street sweepers should be included in the definition. While other vehicles add a small portion of PM to the construction environment, street sweepers remove it by the ton. Allowing sweepers another compliance option aids CARB in reducing overall PM.
- Section 2025 (p) (9) Extension of PM BACT Compliance Deadline... Regulation states "any" auxiliary engine in a two engine sweeper.... Please change to reflect that this refers to only auxiliary engines above 50 hp.
- Section 2025 (s) (7) (A) (4) Record Keeping: Fleets had no way of knowing they would someday need "proof" of mileage driven in 2006. It is hard enough to know what is required today, let alone five years in the future.
- Section 2025 (s) (7) (B) (2) Record Keeping: Vehicles taken to scrap recycling where they are crushed and sold as scrap metal require pink slips be submitted with the vehicle. However, only a receipt is given back. No certificate from the state or local jurisdiction is given.

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- Section 2025 (s) (7) (y) Please ensure compliant fleets without motor carrier numbers (such as street sweepers) are also posted on the website.

Beyond the specifics listed above, taken as a whole, the regulation already has the effect of a phased reduction of street sweepers and the corresponding unemployment of sweeper operators. Additionally, the price increases staff has suggested must be passed on to consumers has been met with property owners electing to cancel or reduce service. Streets and paved areas now not being swept or swept less frequently are contributing to the states air pollution problems.

The forced reduction of California's private sweeper fleet is particularly disturbing as street sweepers actually pick up 10 to 1,000 times more PM than they produce, including both PM10 and PM2.5. If air quality is the goal then eliminating even the oldest, most polluting sweeper remains counterproductive.

Finally, if we can't get the entire On Road Bus and Truck Rule scrapped and enjoy the economic activity that would bring (especially since staff has stated we will still meet the pollution goals by 2023 without the rule) thank you for considering the above suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Carter". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark Carter  
NAPSA CA Vice Chairman