

PUBLIC COMMENT ON PROPOSED SCHOOL BUS REGULATIONS
WILSONA SCHOOL DISTRICT First 15-Day Comments
6 July 2008

XC: TAC Regs (3)
LK
MSCD 08-3-4

Our rural district has 17 buses ranging in age from 1986 through 2005. After completing a cost analysis for us to be ARB compliant at the end of 2013, we would need to spend (worse case) \$735,000. See attached.

There is grant money available in the neighborhood of \$200 million resulting from Prop1B.

Due to the fact school districts own many buses that do not qualify for grant replacement and at the same time are trying to balance very tight budgets, it is likely that the proposed \$200 million set aside for 1B is going to be spent on retrofitting particulate trap emission control devices on old buses. This is disturbing in light of the fact these old buses emitted excessive particulate matter when new and most use oil. The result is the particulate traps will need to be serviced frequently thus adding to maintenance cost and possible engine failure.

It would be better to take the \$200 million and buy new ARB compliant buses. New diesel engines emit far less particulate matter because of a greatly improved electronic fuel delivery system. Particulate traps work nicely on these engines and require very little maintenance. Furthermore, ARB anticipates emission hardware will be available for old buses when needed. In the mean time, they require "best available control technology" (BACT) to proceed with their timetable.

Currently, Wilsona School District has two 2005 buses purchased through grants. They were **required** to have particulate traps and were paid for by the grant. The buses are running without traps because the selling dealership is unable to purchase certified traps.

How do we take a voter approved proposition and make lemonade?

1. School Districts now purchase buses on their own and are left to the expertise of a bus salesman. This results in many districts buying a wide variety of premium buses and in small quantities.
2. It would be much wiser for the CA Department of Education to put together a bus purchasing group. This would allow the bidding of several hundred buses at a time! Currently we are paying approximately \$140,000 for a single full size bus. Experience tells me by purchasing in volume we can lower this price significantly.
3. If the ARB would shift the 200 million to the Department of Education for the purchase of buses in volume we would have a "win win". Old polluting buses that will remain in service due to budget cuts would be taken out of the fleet instead of being "jury rigged" with technology that hasn't been fully developed for old diesel engines. We will be cleaning up the environment with low polluting new diesel technology and replacing ageing buses without taking money from the classrooms... 200 million equals a possible 2000 buses!

In light of school budgets being squeezed, if the proposed regulations are adopted by the Legislature, most School Districts will be forced to slim down or eliminate bus service. This is concerning since school buses are the safest way to transport children!

Thank you,

Richard Stafford
Wilsona School District

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WILSONA SCHOOL DISTRICT
 PROPOSITION 1B SCHOOL BUS COMPLIANCE
 NECESSARY STEPS TO SATISFY NEW PROPOSED EMISSION REQUIREMENTS

Compliance Option One-By Year

Best Available Control Technology..(BACT) For diesel engines, exhaust particulate traps are the only certifiable systems thus far.

BUS #1 (1990) BACT requirement deadline 12/31/2011	Cost \$19,000
BUS #2 (1990) BACT requirement deadline 12/31/2011	Cost \$19,000
BUS #3 (1991) BACT requirement deadline 12/31/2013	Cost \$150,000*
BUS #5 (1990) BACT requirement deadline 12/31/2011	Cost \$19,000
BUS #6 (1990) BACT requirement deadline 12/31/2011	Cost \$19,000
BUS #7 (1991) BACT requirement deadline 12/31/2013	Cost \$150,000*
BUS #10 (1979) BACT requirement deadline 12/31/2013	Cost \$150,000*
BUS #11 (2000) BACT requirement deadline 12/31/2013	Cost \$19,000
BUS #12 (2000) BACT requirement deadline 12/31/2013	Cost \$19,000
BUS #14 (1991) BACT requirement deadline 12/31/2011	Cost \$19,000
BUS #20 (1998) BACT requirement deadline 12/31/2012	Cost \$19,000
BUS #21 (2005) BACT requirement deadline 12/31/2013	Cost \$19,000
BUS #22 (2005) BACT requirement deadline 12/31/2013	Cost \$19,000
BUS #23 (2005) BACT requirement deadline 12/31/2013	Cost \$19,000
BUS #24 (2005) BACT requirement deadline 12/31/2013	Cost \$19,000
BUS #26 (2005) BACT requirement deadline 12/31/2013	Cost \$0.00**
BUS #27 (2005) BACT requirement deadline 12/31/2013	Cost \$0.00**

- Crown buses are exempt till 12/31/2013 and must be replaced.
- ** Two buses have had particulate traps paid for through a grant.

SUMMARY:

Before December 31, 2011 we need to retrofit 5 buses	Cost \$95,000
Before December 31, 2012 we need to retrofit 1 bus	Cost \$19,000
Before December 31, 2013 we need to retrofit 8 (6) buses	Cost \$114,000**

Before December 31, 2013 we need to purchase 3 buses Cost \$450,000

Compliance Option TWO by percentage

PM BACT PERCENTAGE LIMITS (PM..... Particulate Matter)

By 12/31/2010.....25% of our school bus fleet must comply with PM BACT.

This consists of any 3 buses at a cost \$57,000 (Remember 2 buses have been paid for and add to 5 buses that will be required to be retrofitted.

By 12/31/2011.....50% of our school bus fleet must comply with PM BACT.

This consists of 4 more buses at a cost (\$76,000)

By 12/31/2012.....75% of our school bus fleet must comply with PM BACT.

This consists of 4 more buses at a cost (\$76,000)

By 12/31/2013.....100% of our school bus fleet must comply with PM BACT.

This consists of 1 more buses at a cost (\$19,000) and 3 new buses will need to be purchased to replace the crowns....\$450,000

- The above price includes parts and labor to install all necessary equipment to satisfy the proposed new law.
 - These new systems will require "in house" maintenance and out sourcing to insure reliability.
 - The required BACT systems will be an active system (opposed to a passive system) because school buses generally do not drive long enough distances to generate the required heat that self cleans the device. These devices have to be plugged in at night and require 25 amps. THIS MEANS THAT ELECTRICAL OUTLETS WILL HAVE TO BE INSTALLED NEAR THE BUSES.
 - The exhaust trap periodically has to be cleaned and this operation requires equipment and the removed material is considered hazardous waste.
 - The exhaust trap systems work poorly (they plug up) on a worn engines that are using oil.

There is currently \$200 million available in grants for the purchase of the above equipment and infrastructure. We can receive a maximum \$20,000 per bus.

COST COMPARISON BY YEAR & PERCENTAGE

<u>Compliance Option One:</u>		<u>Compliance Option Two:</u>	
(YEAR)		(PERCENTAGE)	
12/31/2010	\$0.00	12/31/2010	\$57,000
12/31/2011	\$95,000	12/31/2010	\$76,000
12/31/2012	\$19,000	12/31/2010	\$76,000
12/31/2013	\$171,000	12/31/2010	\$76,000
(3) New Buses	\$450,000	(3) New Buses	\$450,000

Total compliance outlay to operate beyond 12/31/2013 = \$735,000 without grants.

1B grant money available for 15 buses and Infrastructure X \$20,000 = \$300,000.

At this point only 1 bus (1986) qualifies for new bus funding = \$150,000

1B Grant offset; \$300,000 plus pre 1986 bus replacement grants offset = \$150,000 for a total of \$450,000.

Total compliance outlay to operate after 12/31/2013 with grants = \$735,000 minus \$450,000 = \$285,000 cost outlay.

The \$285,000 does not include normal bus replacement. From now to 12/31/2013 only 3 buses will have been replaced.

Richard Stafford 6/13/08