

Frequently Asked Questions

In-Use Off-Road Diesel Vehicle Regulation

Subfleet Guidelines

Q - What are subfleets?

A - The Air Resources Board's (ARB) in-use off-road diesel vehicle regulation (the regulation) allows companies or agencies that have different divisions, subsidiaries, or other organizational structures in California to report all vehicles owned by the company in one report, or to report as **subfleets** – smaller groups of vehicles¹. Reporting as a group of subfleets does not allow the fleet to change fleet size categories (i.e. does not allow a large fleet to divide itself into many fleets meeting the requirements for small fleets only, but does allow each division to report only its own vehicles, and to manage its vehicles separately from each other). The benefit of reporting as subfleets is that multiple locations or divisions do not have to coordinate reporting and plan compliance with each other.

Q - Who can choose to report as subfleets vs. one combined fleet?

A - Fleets cannot arbitrarily choose to pick any portion of their vehicles and report as subfleets. Subfleets can only be created when a company or agency has multiple divisions or other organization units under separate control,

For example, a company that had two divisions under different management could report as subfleets, even if the vehicles from the different divisions occasionally worked on the same jobsite together.

Q - What are the restrictions if a fleet reports as a group of subfleets?

A - For fleets that report as subfleets, each subfleet will be treated as an individual fleet for the purpose of complying with the regulation, including moving vehicles between subfleets. This means that **fleets reporting and complying as subfleets cannot transfer a Tier 0 vehicle from one subfleet to another**². Effective March 1, 2010, subfleets of large fleets that meet the BACT requirements instead of the fleet averages will only be able to accept Tier 2 or higher vehicles transferred from another subfleet.

This means a fleet that commonly transfers Tier 0 or Tier 1 vehicles between divisions should not report or comply with each division defined as a subfleet, as these transfers will not be allowed. Additionally, any fleet that transfers a significant number of newer vehicles between locations or divisions may want to avoid reporting as a subfleet to avoid the administrative burden of reporting the transfers in DOORS.

¹First paragraph of , Section 2449(d), Performance Requirements, Regulation for In-Use Off-road Diesel Vehicles

² Section 2449(d)(7), Adding Vehicles, Regulation for In-Use Off-road Diesel Vehicles

If subfleets wish to add Tier 0 vehicles from another subfleet, they would have to combine all the vehicles from both subfleets into one larger fleet, which will be possible if both subfleets were meeting the requirements of the regulation.

Any fleet that has reported as a group of subfleets (that are each in compliance with the regulation) may choose to combine all fleets into one larger fleet³.

However, fleets that did not report as subfleets initially may not break into subfleets at a later date. The only exception is the current informal grace period currently being extended to fleets until March 1, 2010. Until that date, fleets that have already reported may break up into subfleets if they meet the requirements detailed for subfleets above.

Q - What are the benefits and disadvantages of reporting as subfleets?

A - The practical benefit of reporting as subfleets instead of one large fleet is that different divisions of a company or agency, or subsidiary companies of a corporation, do not have to communicate with each other to determine compliance with the off-road diesel vehicle regulation. They can manage their own fleet, and set up their own plan to replace, retire, and retrofit their vehicles.

However, this does provide less flexibility. For example, if one subfleet does more than is required by the regulation, they can not provide any credit for the other subfleets; each other subfleet must comply with the regulation based on their own actions.

Example

A corporation with 10,000 horsepower spread equally over 4 different subsidiary companies could either file one report with all their vehicles, or have each different company report and manage their own 2,500 horsepower. Overall, the subfleets would have to perform the same total actions as the 10,000 horsepower fleet. If the overall fleet would have been required to put exhaust retrofits on 20 percent of its horsepower (or 2,000 horsepower) in one year, but instead the fleet broke into subfleets, each smaller subfleet would have to place exhaust retrofits on 20 percent of its 2,500 horsepower (or 500 horsepower each for the 4 subfleets, or 2,000 horsepower total). In either case, the same total actions would be required. Additionally, each 2,500 horsepower subfleet would be considered a large fleet, because their overall corporation has over 5,000 horsepower.

Additionally, if one subfleet put retrofits on 1,000 horsepower even though only 500 was required, the extra 500 horsepower that was retrofit could not be used to help other subfleets comply with the regulation. It would be carried over to the next year's requirements for the subfleet that exceeded the regulatory requirements.

³ Section 2449(d)(6), Fleet Ownership Transferred, Regulation for In-Use Off-road Diesel Vehicles

Q - How can a fleet report as subfleets?

A - To report as a subfleet, follow the DOORS Reporting Guide for Subfleets, at <http://www.arb.ca.gov/msprog/ordiesel/documents/doors/subfleets.pdf>
For fleets that have already reported and wish to take advantage of the informal grace period and break into subfleets, the fleets may request assistance from ARB by emailing doors@arb.ca.gov and should include their DOORS ID and a description of their plan to break the fleet into a group of subfleets.