

## In-Use Off-Road Diesel Vehicle Regulation



### ARB Off-road Implementation Section

California Environmental Protection Agency  
Air Resources Board



## Outline

- Need for Emissions Reductions
- Exhaust Retrofit Technologies
- Off-Road Regulation Requirements
- Off-Road Compliance Examples
- Technology Demonstrations
- Funding Programs
- SOON Program
- Compliance Assistance and Outreach
- DOORS
- Contacts

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## Need for Emission Reductions

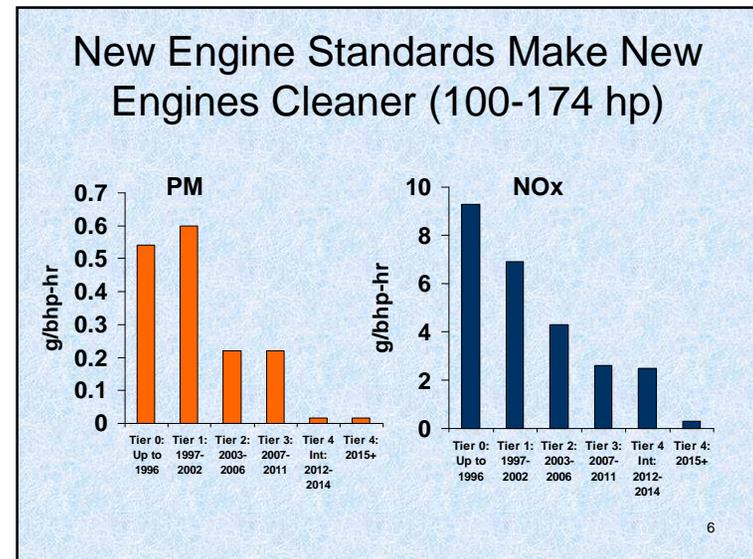
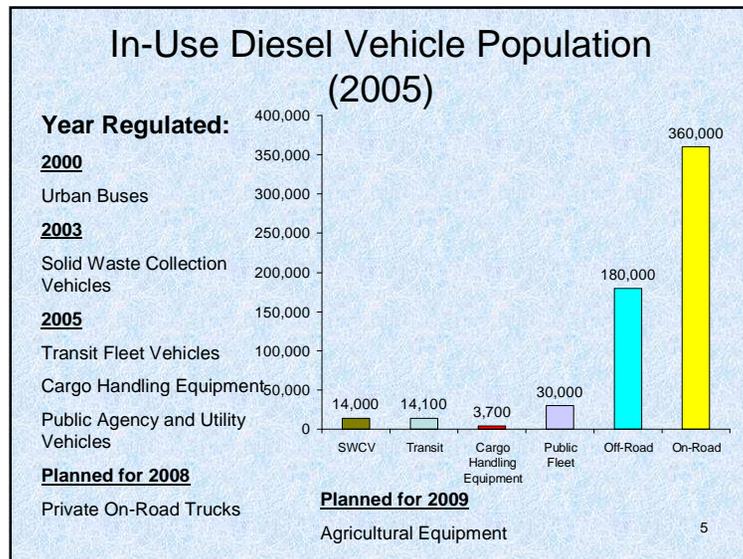


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## Need for Emission Reductions

- Must reduce Diesel Particulate Matter (PM)
  - 70% of known cancer risk from all air toxics
  - Thousands of deaths per year in California (heart disease and cancer)
- Must reduce oxides of nitrogen (NOx)
  - Ozone and secondary PM formation
  - Ozone is a serious lung irritant, associated with premature deaths and asthma
- Attain ozone and PM standards
  - Could lose federal highway funds if California cannot show that standards will be attained by deadline

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- ### Cumulative Health Benefits
- **4,000 fewer premature deaths**
  - 110,000 fewer cases of asthma and lower respiratory symptoms
  - 680,000 work loss days
  - 3,900,000 restricted activity days
  - \$18 - \$26 billion in avoided health costs
  - 2020:
    - 32% reduction in NOx
    - 74% reduction in diesel PM
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## What is an Exhaust Retrofit?

- Systems that reduce specific pollutants
  - Can control one or more pollutants such as PM, NOx, or both
  - Installed on an in-use vehicle
- Systems include, but are not limited to:
  - Diesel particulate filters (DPFs)
  - Flow through filters (FTFs)
  - Diesel Oxidation Catalysts (DOCs)
  - Selective Catalytic Reduction (SCR)

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## Exhaust Retrofits Cont.

- Also commonly referred to as retrofits, filters, scrubbers
- “Repowers” are not considered exhaust retrofits
- Once a device is verified with ARB, it becomes a verified diesel emission control strategy (VDECS)

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## ARB Verification of Retrofits

- Ensures emission reductions and durability
- Provides end user warranty
  - 4-5 years and 2,600-4,200 operating hours
  - A current list of verified devices is located at: [www.arb.ca.gov/diesel/verdev/verdev.htm](http://www.arb.ca.gov/diesel/verdev/verdev.htm)

Level	PM Reduction	Typical Device
1	≥ 25%	Oxidation catalyst
2	≥ 50%	Flow-thru filter
3	≥ 85%	Particulate filter



DPF durability demonstration on concrete

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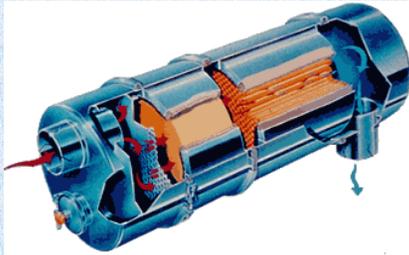
## ARB Verification Cont.

- VDECS that reduce NOx are not given a “Level”
  - NOx VDECS are currently verified by % NOx reduction
  - Soon will be verified with Mark 1 to Mark 5
- Highest Level VDECS
  - Required by off-road regulation
  - Achieve maximum PM reductions
  - Do not take into account NOx reductions
  - Most commonly are DPFs

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## How Does a Diesel Particulate Filter (DPF) Work?

- The filter is positioned in the exhaust stream to trap or collect a significant fraction of the particulate emissions while allowing the exhaust gases to pass through the system.



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## DPF Information Cont.

- The volume of PM generated by a diesel engine will fill up (load) a DPF over time; thus the trapped PM must be burned off or "regenerated" periodically
  - Active regeneration: Needs heat to regenerate – electricity or burning additional fuel
  - Passive regeneration: No outside energy required
- DPF requires periodic cleaning of ash
  - Build-up of ash occurs due to regeneration
  - Ash cleaning required ~ yearly depending on usage

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## Verified Level 3 Off-road Devices

(as of 8/1/08)

Product	Applicability
Cleaire Horizon	Most on-road engines; 15 ppm sulfur diesel; conditionally verified for off-road engines
HUSS Umwelttechnik FS_MK	Most on-road and off-road diesel engines through 2007 model year.
Engine Control System Combifilter	1996-2004 off-road
Caterpillar DPF	Conditionally verified for 1996-2008 model years; off-road, rubber tired
DCL MINE-X Sootfilter	Conditionally verified for 1996-2008 model year, rubber tired off-road

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## Off-Road Regulation Requirements



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## Applicability

Regulation applies to any person, business, or government agency who owns or operates any diesel-fueled or alternative diesel fueled off-road vehicle horsepower within California

- Applies to vehicles  $\geq$  25 horsepower
- Applies to the "drive" engine only
- Includes out-of-state vehicles brought into California
- Excludes vehicles primarily used ( $>$  50% time) for agricultural operations
- Excludes vehicles used for personal use

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## Applicability Cont.

- What is considered an off-road vehicle?
  - Vehicles that were intended to be used off-road
  - Cannot be registered to drive safely on-road
  - A workover rig
- Excludes vehicles designed to operate on-road regardless of use
- Current proposal to add 2 engine cranes (both engines)

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## Requirements Vary by Fleet Size

Fleet Size Category	Description
Small	Fleet with $\leq$ 2,500 hp, or Municipal fleet in low population county
Medium	Fleet with 2,501 to 5,000 hp
Large	Fleet with more than 5,000 hp, or State or Federal Government fleet

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## 5 Minute Limit on Idling

- Requirement effective June 15, 2008
- 5 minute idling limit for off-road vehicles
- Exemptions from this requirement:
  - idling when queuing
  - idling to verify that the vehicle is in safe operating condition
  - idling for testing, servicing, repairing or diagnostic purposes
  - idling necessary to accomplish work for which the vehicle was designed (such as operating a crane)
  - idling required to bring the machine system to operating temperature
  - idling necessary to ensure safe operation of the vehicle

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## Idling Limit Cont.

- Can apply to ARB Executive Officer to idle > 5 min. if reason not covered in exemptions
- Enforcement of 5 min. idling
  - Field audits will begin after September 15, 2008
  - Until then, only complaints of excessive idling filed by the public with ARB will be pursued
- Fines
  - First time offense: \$300 per violation
  - Subsequent offenses: Can be \$1,000 to \$10,000 per violation

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## Disclosure of Applicability

- Disclosure of regulation applicability:
  - Persons selling in California to California buyer
  - Disclosure records must be kept for 3 years
  - Disclosure not required for manufacturers selling to dealers
  - Language must be included on the bill of sale, invoice, or price quote that is signed by buyer

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## Disclosure of Applicability Cont.

**“When operated in California, any off-road diesel vehicle may be subject to the California Air Resources Board In-Use Off-road Diesel Vehicle Regulation. It therefore could be subject to retrofit or accelerated turnover requirements to reduce emissions of air pollutants. For more information, please visit the California Air Resources Board website at <http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm>”**

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## Disclosure of Applicability Cont.

- Enforcement of disclosure provision
  - Field audits will not be conducted until after September 15, 2008
  - Until then, only complaints filed by the public will be pursued
- Fines
  - First time offense: \$500 per violation
  - Subsequent offenses: \$1,000 to \$10,000 per violation

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## Beginning March 1, 2009

- Written 5 minute idling policy should be established by fleet owner
  - Required for medium and large fleets
  - Must make idling policy available to all vehicle operators in fleet
- Can no longer add Tier 0 vehicles to fleet

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## Initial Reporting

- Initial reporting varies by fleet size
  - Fleets must report their fleet information as it was on March 1, 2009
  - Fleets must report their information to ARB by their designated reporting date
  - Reporting is free, no cost to fleets to register vehicles with ARB

Fleet Size Category	Initial Reporting Date
Large	April 1, 2009
Medium	June 1, 2009
Small	August 1, 2009

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## Vehicle Labeling

- All vehicles subject to the regulation must be labeled
  - ARB assigns Equipment Identification Number (EIN) after initial reporting period; label stays with vehicle for life
  - Fleets must label vehicles within 30 days of receiving EIN; labels not issued by ARB
  - Label dimensions/specifications found in section 2449(f)



**DB8B97**

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## Compliance Requirements

- Compliance requirements must be met by March 1 of each year

Fleet Size Category	Dates and Requirements
Large*	2010-2020 PM and NOx
Medium*	2013-2020 PM and NOx
Small	2015-2025 PM only

\* Same requirements for large and medium fleets, only initial compliance date varies.

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## NOx Requirements

Two ways to meet the NOx requirements (the lesser of the two can be done):

- NOx fleet average targets requirements
  - Meet NOx emissions targets set in regulation by any means

or

- Best Available Control Technology (BACT) requirements:
  - Turn over engines at a rate of 8% of total fleet horsepower per year (after 2015, the 8% turnover rate increases to 10%)

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## NOx Emission Factors\*

NO <sub>x</sub> Emissions Factors by Horsepower and Year (g/bhp-hr)								
Year	Horsepower Groups							
	25-49	50-74	75-99	100-174	175-299	300-599	600-750	750+
1900	7.2	14.8	14.8	15.9	15.9	15.2	15.2	15.2
1969	7.2	14.8	14.8	15.9	15.9	15.2	15.2	15.2
1970	7.2	14.8	14.8	14.8	14.8	14.1	14.1	14.1
1972	7.2	14.8	14.8	13.6	13.6	13.0	13.0	13.0
1980	7.2	14.8	14.8	12.5	12.5	11.9	11.9	11.9
1988	7.1	9.9	9.9	9.3	9.3	8.9	8.9	8.9
1989	7.1	9.9	9.9	9.3	9.3	8.9	8.9	8.9
1996	7.1	9.9	9.9	9.3	6.9	6.9	6.9	8.9
1997	7.1	9.9	9.9	6.9	6.9	6.9	6.9	8.9
1998	7.1	6.9	6.9	6.9	6.9	6.9	6.9	8.9
1999	6.2	6.9	6.9	6.9	6.9	6.9	6.9	8.9
2000	6.2	6.9	6.9	6.9	6.9	6.9	6.9	6.9
2001	6.2	6.9	6.9	6.9	6.9	4.2	6.9	6.9
2002	6.2	6.9	6.9	6.9	6.9	4.2	4.2	6.9

\* Only partial chart shown

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## NOx Fleet Average Calculation Example

Example fleet of 3 vehicles:

Vehicle 1: 1996, 100 hp, NOx EF = 9.3

Vehicle 2: 2000, 200 hp, NOx EF = 6.9

Vehicle 3: 2002, 300 hp, NOx EF = 4.2

NOx Fleet Average

$$= [(9.3 \times 100) + (6.9 \times 200) + (4.2 \times 300)] / (100 + 200 + 300)$$

$$= 6.0$$

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## NOx Fleet Average Emission Targets

NOx Fleet Average Targets: MEDIUM AND LARGE FLEET											
Horsepower Group	2010*	2011*	2012*	2013	2014	2015	2016	2017	2018	2019	2020
25-49 hp	5.8	5.6	5.3	5.1	4.9	4.6	4.4	4.2	4.0	3.7	3.5
50-74 hp	6.5	6.2	5.8	5.5	5.1	4.8	4.4	4.1	3.7	3.4	3.2
75-99 hp	7.1	6.7	6.2	5.7	5.2	4.8	4.3	3.8	3.3	2.8	2.4
100-174 hp	6.4	6.0	5.5	5.1	4.7	4.3	3.8	3.4	3.0	2.6	2.2
175-299 hp	6.2	5.8	5.3	4.9	4.5	4.1	3.6	3.2	2.8	2.3	1.9
300-599 hp	5.9	5.5	5.1	4.7	4.3	3.9	3.5	3.1	2.7	2.3	1.9
600-750 hp	6.1	5.6	5.2	4.8	4.4	4.0	3.6	3.2	2.7	2.3	1.9
Greater than 750 hp	7.2	6.8	6.5	6.1	5.7	5.3	4.9	4.5	4.1	3.8	3.4

\* Targets in 2010, 2011, and 2012 are for LARGE fleets only

Vehicle 1 = 100 hp, NOx 2010 target is 6.4

Vehicle 2 = 200 hp, NOx 2010 target is 6.2

Vehicle 3 = 300 hp, NOx 2010 target is 5.9

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## NOx Fleet Average Target Calculation Example

For 2010 compliance date:

Vehicle 1 (100 hp): NOx target = 6.4

Vehicle 2 (200 hp): NOx target = 6.2

Vehicle 3 (300 hp): NOx target = 5.9

NOx Fleet Average Target:

$$= [(6.4*100)+(6.2*200)+(5.9*300)]/(100+200+300) \\ = 6.1$$

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## Compare Target with Average

NOx fleet average = 6.0

NOx fleet average 2010 target = 6.1

$$\underline{6.0 < 6.1}$$

Since NOx fleet average is less than the NOx fleet target set for 2010, the fleet is in compliance

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## NOx BACT Requirements

- Must turn over Tier 0 and Tier 1 (without PM standard) vehicles first
- Compliance options for NOx BACT turnover requirements:
  - Replace older vehicles with new or used vehicles
  - Replace diesel vehicles with electric or alternative fuel vehicles
  - Repower older engines with a Tier 2 or higher engines
  - Retire vehicles from fleet
  - Designate vehicles as low use (used < 100 hours per year)
  - Install NOx verified diesel emission control strategy (VDECS)

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## Special Provisions for Attainment Counties

- Fleets captive to listed attainment counties
  - Do not need to meet turnover requirements or NOx fleet averages
- These counties are always in: they cannot fall out of this provision, and other counties cannot come in
- Fleets can travel within multiple attainment counties

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## Attainment Counties



Attainment counties include:

Alpine, Colusa, Del Norte, Glenn, Humboldt, Lake, Lassen, Mendocino, Modoc, Monterey, Plumas, San Benito, San Luis Obispo, Santa Barbara, Santa Cruz, Shasta, Sierra, Siskiyou, Trinity, Tehama, and Yuba

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## PM Requirements

Two ways to meet the PM requirements (the lesser of the two can be done):

- PM fleet average targets requirements
  - Meet PM emissions targets set in regulation by any means

OR

- Best Available Control Technology (BACT) requirements:
  - Install verified diesel emission control strategy VDECS (also referred to as PM retrofits) on 20% of total fleet horsepower per year

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## PM Emission Factors\*

PM Emissions Factors by Horsepower and Year (g/bhp-hr)								
Year	Horsepower Groups							
	25-49	50-74	75-99	100-174	175-299	300-599	600-750	750+
1900	0.950	1.200	1.200	1.100	1.100	0.950	0.950	0.950
1969	0.950	1.200	1.200	1.100	1.100	0.950	0.950	0.950
1970	0.950	1.200	1.200	0.940	0.940	0.810	0.810	0.810
1972	0.950	1.200	1.200	0.780	0.780	0.680	0.680	0.680
1988	0.950	0.980	0.980	0.540	0.540	0.490	0.490	0.490
1989	0.950	0.980	0.980	0.540	0.540	0.490	0.490	0.490
1996	0.950	0.980	0.980	0.540	0.40	0.40	0.40	0.500
1997	0.950	0.980	0.980	0.600	0.40	0.40	0.40	0.500
1998	0.950	1.090	1.090	0.600	0.40	0.40	0.40	0.500
1999	0.60	1.090	1.090	0.600	0.40	0.40	0.40	0.500
2000	0.60	1.090	1.090	0.600	0.40	0.40	0.40	0.40
2001	0.60	1.090	1.090	0.600	0.40	0.15	0.40	0.40
2002	0.60	1.090	1.090	0.600	0.40	0.15	0.15	0.40

\* Only partial chart shown

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## PM Fleet Average Emission Targets

PM Fleet Average Targets: MEDIUM AND LARGE FLEETS**											
Horsepower Group	2010*	2011*	2012*	2013	2014	2015	2016	2017	2018	2019	2020
25-49 hp	0.46	0.46	0.39	0.39	0.29	0.29	0.21	0.21	0.12	0.12	0.08
50-74 hp	0.60	0.60	0.43	0.43	0.23	0.23	0.18	0.18	0.12	0.12	0.08
75-99 hp	0.62	0.62	0.46	0.46	0.24	0.24	0.19	0.19	0.13	0.13	0.07
100-174 hp	0.33	0.33	0.26	0.26	0.18	0.18	0.14	0.14	0.10	0.10	0.06
175-299 hp	0.23	0.23	0.16	0.16	0.11	0.11	0.08	0.08	0.06	0.06	0.03
300-599 hp	0.18	0.18	0.14	0.14	0.11	0.11	0.08	0.08	0.06	0.06	0.03
600-750 hp	0.20	0.20	0.14	0.14	0.11	0.11	0.08	0.08	0.06	0.06	0.03
Greater than 750 hp	0.30	0.30	0.24	0.24	0.18	0.18	0.11	0.11	0.08	0.08	0.06

\* Targets in 2010, 2011, and 2012 are for LARGE fleets only

\*\* Note: There is a separate table for SMALL fleet targets

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## PM BACT Requirements

- Compliance options for PM BACT retrofit requirements:
  - Install PM VDECS
- Retirement of Tier 0s for a fleet decreasing in horsepower
  - If a fleet is “shrinking” from the previous year, the Tier 0 horsepower retired (and not replaced) from the fleet can count towards PM BACT compliance
  - Example: If a fleet retires 20% Tier 0 vehicles, both the PM and NOx BACT requirements are fulfilled

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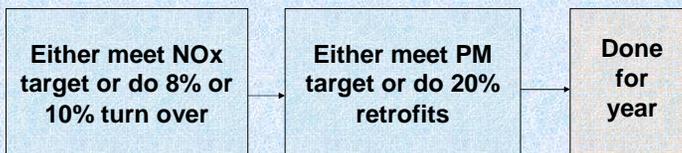
## PM BACT Cont.

- Order of VDECS installation:
  - All vehicles accepting Level 3 VDECS must be retrofitted first
  - Then, install Level 2 VDECS only if:
    1. All vehicles that can accept Level 3 VDECS are already retrofitted, and
    2. A Level 2 VDEC is the highest verified device available at that time for that vehicle
  - Level 1 VDECS cannot be used to meet the PM BACT requirements

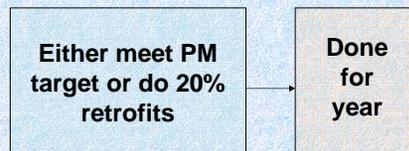
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## Annual Compliance Process

Large and Medium Fleets: NOx\* and PM Requirements



Small Fleets: PM Requirements ONLY



\*Captive attainment area fleets must only meet the PM requirements

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## NOx Final Compliance

- As of March 1, 2020 (for medium and large fleets only):
  - If 2020 NOx fleet average target is not met, the fleet must do the required NOx BACT turnover until that 2020 target is met

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## PM Final Compliance

- As of March 1, 2021 (for medium and large fleets), and March 1, 2026 (for small fleets):
  - All vehicles must have the highest level VDECS installed; if not, the fleet is required to install the highest level VDECS at the required PM BACT retrofit rate
  - Fleets not meeting the NOx final compliance targets must do so first

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## Restrictions on Adding Vehicles

- Cannot add Tier 0 vehicles after March 1, 2009
- Fleet averages met in the previous year
  - Fleets may not add vehicles that cause them to exceed the most recent targets
  - If the targets are exceeded, the fleet has 3 months to bring the fleet back into compliance
- BACT requirements met in the previous year
  - Small fleets: The vehicle must be Tier 2 or higher

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## Adding Vehicles Cont.

- Large/Medium fleets: The vehicle must be Tier 2 or higher and have a NOx emission factor less than or equal to the current year NOx fleet average target

Horsepower Group	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
25-49 hp	T2					T4					
50-74 hp						T3					
75-99 hp	T2					T3					T4
100-174 hp						T3					
175-299 hp	T2					T3					
300-599 hp						T3					
600-750 hp	T2					T3					
Greater than 750 hp						T3					

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## Annual Reporting

- Report any changes to the fleet from the previous year
  - Includes VDECS installed, vehicles replaced, etc.
- If final compliance target is not met, reporting must continue beyond last designated reporting date
- Reporting dates vary by fleet size:

Fleet Size Category	Reporting Date
Small	August 1 <sup>st</sup> : 2014-2026
Medium	June 1 <sup>st</sup> : 2012-2021
Large	April 1 <sup>st</sup> : 2010-2021

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## Annual Record keeping

- Records must be kept between reporting periods:
  - Changes in the fleet since last reported
  - Newly purchased vehicles
  - Rebuilt engines
  - VDECS that have failed
  - VDECS serial numbers
  - Manufacturer delays
  - Executive Officer approvals for extensions, approval of alternative fuels, idling exceptions, etc.
- Records must be kept until the vehicle is retired, or 2030 (whichever is earlier)

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## Rental and Leased Vehicles

### Vehicles owned by a rental or leasing company

- If rented/leased < 1 year
  - Vehicle must be included in the owner's fleet
- If rented/leased >= 1 year
  - May be excluded from the owner's fleet, and included in the lessee's fleet only if written into the lease agreement
- Leases occurring before June 15, 2008
  - If "leased" as defined in California Uniform Commercial Code for at least one year, the vehicle must be included in the lessee's fleet (not owner)

Persons who provide financing in the form of "finance leases," as defined in California Uniform Commercial Code 10103(a)(7) do not "own" such vehicles for the purposes of this regulation

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## Out-of-State Fleets

- All vehicles operating in California that are owned by an out-of-state company must still comply with the regulation
  - If they report initially in 2009, they can comply with the fleet average or BACT approach
  - If they are a new fleet that enters California after March 1, 2009, they must meet the fleet average targets upon entering the state
    - Stricter than for in-state fleets
  - All vehicles brought into California must be reported to ARB within 30 days of entering the state

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## Early Credit Examples

- Early credit for actions taken before March 1, 2009
- Double credit for PM retrofits
  - A VDECS installed early on a 200 hp vehicle would provide 400 hp credit towards the PM BACT requirements
- Single credit for repowers
  - A repower completed on a 300 hp machine would provide a 300 hp credit towards the NOx BACT requirements
  - A repower from a Tier 0 to Tier 1 will receive NOx BACT credit only until March 1, 2009

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## Early Credit Examples

- Credit for replacement of Tier 0s in excess of an average 8%/year turnover rate between March 1, 2006 and March 1, 2009
  - If a fleet retired/replaced its Tier 0 machines at a rate of 10% per year between 2006 and 2009, the fleet would obtain a 6% early credit towards the NOx BACT requirements
- Double credit for electric vehicles until 2016
  - If an electric vehicle is replacing a 200 hp diesel vehicle, 400 hp with a 0 NOx and 0 PM emission factor should be included in the NOx and PM fleet averages

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## Exemptions from Engine Turnover Requirements

- Small fleets
- Captive area attainment fleets
- Vehicles less than 10 years old
- Specialty vehicles if certain criteria are met
- Vehicles retrofit in past 6 years
- Tier 4 or Tier 4 Interim vehicles

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## Exemptions from Retrofit Requirements

- Engines in vehicles less than 5 years old
- Engines for which there is no retrofit available or for which one cannot be safely installed
- New engines that come with an OEM diesel particulate filter
- Engines already retrofit with the highest level VDECS at time of installation

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## Other Exemptions and Compliance Extensions

- Exempt from all but recordkeeping/reporting
  - Low-use vehicles
    - Operated less than 100 hours/year
  - Emergency vehicles
  - Dedicated snow removal vehicles
- Compliance extensions
  - Manufacturer delays for retrofits or new engines
  - Delay of Tier 4 interim or final vehicles

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## Fines for Non-Compliance

- Violation of the NOx provisions
  - Up to \$1,000 per vehicle per day of non-compliance
- Violation of the PM provisions
  - Up to \$10,000 per vehicle per day of non-compliance
  - If a citation is given, and the violation is not corrected, the fines can go up to \$40,000 per vehicle per day of non-compliance

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## Off-Road Compliance Examples



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## Getting Started

1. Determine which vehicles are subject to the regulation
  - Dedicated snow removal, emergency use, agricultural, and personal use vehicles are exempt
  - On-road vehicles and portable equipment are not covered
2. Gather vehicle data for applicable vehicles
  - Engine model year, vehicle model year, engine hp
  - Are any vehicles low use?

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## Getting Started Cont.

3. Determine fleet size
  - Calculate total fleet hp: exclude any exempted vehicles from 1. above, also exclude low use vehicles
4. Determine compliance requirements
  - Based on fleet size, determine whether the fleet must comply with the NOx requirements
  - Is the fleet a captive area attainment fleet?
  - Determine first compliance date, also based on fleet size
5. Calculate early credit
  - Add up hp credit for any early repowers, exhaust retrofits, or replacements

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## Getting Started Cont.

6. Calculate NO<sub>x</sub> and PM fleet averages and targets (can use Fleet Average Calculator for this, available on ARB website)
  - Determine if the fleet is currently meeting fleet targets
  - If fleet is meeting the NO<sub>x</sub> and/or PM targets, no turnover and/or exhaust retrofitting is required
  - If not meeting the targets, determine turnover and/or retrofits needed to meet targets
7. If not meeting the fleet targets, calculate the applicable turnover and retrofits required by BACT (Best Available Control Technology requirements)
8. Determine the minimum turnover/retrofit requirements for compliance: BACT or targets

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## What About Turnover Exemptions?

- What if I have vehicles exempt from the BACT turnover requirements in a given year?
  - Vehicles < 10 years-old, specialty vehicles, etc.
  - Calculate the amount of turnover (in horsepower) needed, and compare to amount of horsepower with exemptions
- Cannot utilize exemption until all non-exempt hp has been turned over first

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## Turnover Example

- Fleet A has 10,000 total fleet hp
- 9,500 hp has turnover exemptions in 2010
- Therefore, 500 hp available for turnover
- 8% turnover required to meet NO<sub>x</sub> BACT requirements =  $10,000 \times 0.08 = 800$  hp
  - Available hp for turnover = 500 hp
  - Required hp for NO<sub>x</sub> BACT turnover = 800 hp

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## Turnover Example Cont.

- Since available hp (500 hp) < required hp (800 hp), perform available turnover (500 hp) to meet the NO<sub>x</sub> requirements
- If available hp = 1,000 hp, only required hp (800 hp) would need to be turned over to meet NO<sub>x</sub> BACT turnover requirements

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## What About Retrofit Exemptions?

- What if there are no available VDECS for some/all of my fleet? What if some of my vehicles are > 5 years-old?
  - VDECS not available, vehicle < 5 years-old
  - Calculate amount of horsepower with retrofits needed, and compare to amount of horsepower with retrofit exemptions
- Cannot utilize exemption until all non-exempt hp has been retrofit

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## Retrofit Example

- Fleet A has 10,000 total fleet hp
- There are no retrofits available for 9,500 hp of the fleet in 2010
- Therefore, 500 hp available to retrofit
- 20% of fleet must be retrofitted to meet PM BACT requirements =  $10,000 * 0.2 = 2,000$  hp
  - Available hp to retrofit = 500 hp
  - Required hp to retrofit for PM BACT = 2,000 hp

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## Retrofit Example Cont.

- Since available hp (500 hp) < required hp (2,000 hp), perform available retrofits (500 hp) to meet the PM requirements
- If available hp = 3,000 hp, only required hp (2,000 hp) would need to be retrofit to meet PM BACT retrofit requirements

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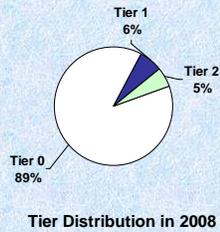
## Other Considerations

- Hours in fleet average provision
  - Hours of operation can be used in the fleet average calculations
  - Beneficial for fleets with many minimal use Tier 0 vehicles
  - However, an 18% penalty is applied to fleet averages
- Use ARB Fleet Average Calculator or DOORS compliance tool to evaluate compliance options

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## Compliance Example Fleet 1 - Older Earth Moving Fleet

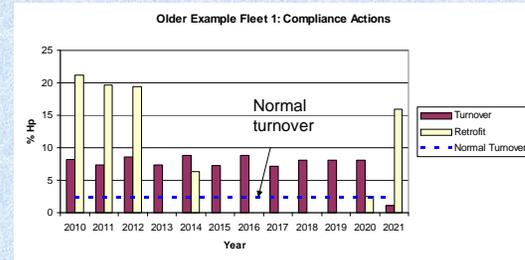
- Fleet in 2008
  - 88 engines totaling 40,000 hp
  - Scrapers, tractors, and dozers
  - Average age of vehicles 21 yrs
  - Normal turnover 2% per year
  - Normally buys used



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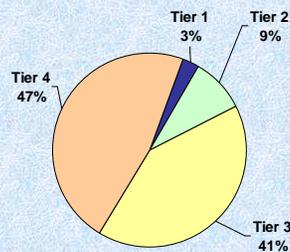
## Fleet 1 Compliance Actions

- Continues to buy used vehicles
- 8% turnover per year (safety valve)
- 20% retrofits in first 3 years; few thereafter



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## Fleet 1 Engine Tier Distribution in 2020



- Majority of engines needed to comply with 2020 goals already available today

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## Technology Demonstrations



Loader with Passive DPF



Scraper with Passive DPF

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## Off-Road Showcase Demonstration

- \$4.9 million allocated through SCAQMD (South Coast Air Quality Management District) & MSRC (Mobile Source Air Pollution Reduction Review Committee)
  - Close coordination with ARB
- Achieve early emission reductions
- Prove effectiveness of technologies on wide range of off-road engines
  - Interested fleets may view retrofits in action
- Will spur verification of new retrofits
  - Applicants required to pursue verification concurrently with Showcase demonstration

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## Off-Road Showcase Cont.

- Emission control manufacturer participants
  - 14 Manufacturers, 24 systems
  - 8 Active DPFs
  - 15 Passive DPFs
  - 6 PM + NOx devices
  - 6 Fuel borne catalyst systems
- Eighteen Fleet Owners
  - 5 Public Fleets
  - 13 Private Fleets
- Total of 230 Vehicles

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## U.S. EPA SEP

- U.S. EPA settlement against Chevron and Valero
  - \$750,000 in fines
- Settlement agreements stipulated money to be spent on retrofit of off-road equipment
- Overall goals similar to Showcase
- Help fill gaps in Equipment Matrix
- Demonstrate Additional Technologies
- 15 vehicles have been successfully retrofitted with DPFs so far
  - 8 Passive DPF Devices
  - 5 Active DPF Devices
  - 3 NOx Control Systems

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## Funding Programs



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## Pilot Off-Road Loan Incentives (POLI)

- Help some fleets obtain loans for which they would not otherwise qualify
- Pilot program for fleets in SJV
- Must meet criteria
- Apply at participating lenders
- More info: <http://arb.ca.gov/ba/loan/loan.htm> or contact Jessica Dean at [jdean@arb.ca.gov](mailto:jdean@arb.ca.gov)

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## POLI Criteria

- < 100 employees
- <\$10 mil annual revenues
- Loan for ARB-verified diesel retrofit
- Operate at least part time in SJV
- Difficulty obtaining conventional financing
- Any fleet sizes
- Other program & financial criteria

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## Carl Moyer Incentive Program

- Statewide program with \$140 million/yr in incentive monies
- Program provides incentive money to clean up equipment in California
  - Equipment includes: off-road, on-road, marine, locomotive, agricultural
- Eligible off-road projects include engine repowers, exhaust retrofits, equipment replacement
- Vehicle owner has to pay a small portion of the project costs
- Must do more than required by regulation
- More information is located at: [www.arb.ca.gov/msprog/moyer/moyer.htm](http://www.arb.ca.gov/msprog/moyer/moyer.htm)

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## Is Incentive Funding Available?

- Small fleets
  - 100% eligible if completed by February 28, 2012
  - Eligible based on NOx and ROG reductions thereafter
- Medium fleets
  - 100% eligible if completed by February 28, 2010
  - Early compliance needed after
- Large fleets
  - Early compliance needed to receive funding <sup>80</sup>

## SOON Program



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## What is the SOON Program?

- Surplus Off-road Opt-in for NOx (SOON) program is designed to achieve additional NOx reductions
- Local air districts may opt into this program to reduce NOx emissions beyond what is required by the off-road regulation
  - May make program voluntary or mandatory
- Carl Moyer incentive money is used to fund these additional NOx reductions
- If fleets meet the applicable criteria, district may require them to apply for SOON funding

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## Fleet Criteria for SOON

- If SOON mandatory, a fleet must apply if they:
  - Operate vehicles in participating air district
  - Must have operated in that district more than any other air district and >100 hrs/yr for the past three years and
  - Contain over 20,000 hp statewide
  - Have >40% Tier 0 & 1 vehicles
- If they receive funds – must take actions funded
- Must apply for enough actions to go from compliance with ARB rule to SOON targets
- A way for large fleets to access incentive monies

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## Participating Districts

- South Coast
  - Opted in on May 2, 2008
  - Have already awarded \$10 – \$15 million
  - 2<sup>nd</sup> solicitation due November 7, 2008
- San Joaquin Valley
  - Have proposed to opt-in
  - Currently in the guideline development stage

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## Compliance Assistance and Outreach



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## Compliance Assistance and Outreach

- Staff will be available to work with individual fleets on their compliance plans
- Off-road Implementation Seminars planned for a dozen locations statewide
  - Late July – August, contact Eric Brown ([ebrown@arb.ca.gov](mailto:ebrown@arb.ca.gov)) with questions
- Staff available to give off-road presentations at the request of fleet owners, industry groups, equipment dealers and manufacturers

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## Off-Road Implementation Advisory Group (ORIAG)

- Informal committee of affected fleets, air districts, and industry representatives
- Goal is to help ARB to fine tune outreach, training, and implementation materials
- Members of the public welcome to attend
- First ORIAG meeting held May 12, 2008 in Sacramento, second meeting held June 25, 2008 in El Monte
- Contact Beth White ([eiwhite@arb.ca.gov](mailto:eiwhite@arb.ca.gov)) or visit <http://www.arb.ca.gov/msprog/ordiesel/oriag/oriag.htm> for more details

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## Off-Road Fleet Average Calculator Overview

- Microsoft Excel spreadsheet tool designed by ARB staff
- Fleet enters in horsepower and model year of each engine
- Calculates the NOx and PM fleet averages, targets, and BACT requirements for each year
- Also calculates early credit and carryover credits earned by fleets

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## What is DOORS?

- Diesel Off-road On-line Reporting System
  - An on-line tool which allows you to compile and report your fleet information
  - Meets the reporting requirements
  - Retains your fleet data for future reporting
  - Includes additional features such as automated compliance planning

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## Outline of DOORS Discussion

- Where to find reporting forms, tools, and user guides
- Creating a DOORS account
- Submitting your fleet information
  - Directly on-line
  - Uploading with a spreadsheet
  - Hardcopy
- ARB review of your fleet – receive EINs and Certificate of Compliance
- Compliance planning and other features

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## Finding the Reporting Homepage

<http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm>

The screenshot shows the ARB website's navigation menu with the following items: Home, Programs, Rulemaking, Board Meetings, Laws & Regulations, Data & Statistics, Permits, Etc., and Events. Below the menu is the page title 'IN-USE OFF-ROAD DIESEL VEHICLE REGULATION'. The main content area features a 'Quick Links' section with four buttons: 'Overview & Fact Sheets', 'Free Training Seminars', 'Reporting Forms' (circled in red), and 'Compliance Planning Tools'. There is also a 'Regulation Language' button. A sidebar on the left contains 'Up Links' and 'Local Links' sections. A news item at the bottom mentions a regulation adopted on July 26, 2007, to reduce diesel emissions.

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## DOORS Account

If you have not done so before, you will need to request an account.

After you have an account, you may log in on subsequent visits to view and update your fleet information.

**User Name:**

**Password:**

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# DOORS Reporting Homepage

Skip to: [Content](#) | [Footer](#) | [Accessibility](#) | [A-Z Index](#) Search ARB

California Environmental Protection Agency  
**AIR RESOURCES BOARD**

DIESEL OFF-ROAD ON-LINE REPORTING SYSTEM (DOORS)

Select the fleet with which you want to work, then select the action below:  
   
 An \* indicates fleets that you have submitted for ARB review.

Select the action you would like to take, then click on "Take Action":

**The green area below applies to and works for fleets that have been reviewed by ARB.**

Select the fleet with which you want to work, then select the action below:  
   
 An \* indicates fleets that you have submitted for ARB review.

Select the action you would like to take, then click on "Take Action":

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# DOORS – Online Forms “enter a fleet” “Enter Fleet Data On-line” [Take Action]

An \* indicates fleets that you have submitted for ARB review.

Enter Fleet Data On-line   
 Upload Fleet Data   
 Enter Fleet Data On-line   
 View Owner Info   
 View Fleet Info   
 Request Review

**been reviewed by ARB.**

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# Owner Information

Reporting Home | Edit Owner | Add/Edit Vehicle | Add/Edit Engine | Add/Edit VDECS | Done

Explanation of terms

Legal owner name:

Company / Agency name

Company / Agency type (optional)

Company / Agency tax id

Address1

Address2

City

State abbreviation CALIFORNIA

Zip

Responsible person

Responsible Person title

Is your fleet in a low population county? No

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# Vehicle Information

Explanation of terms

Line #	Veh serial num	Your veh num	Type	Manufacturer
3			Rollers	no vehicle manufacturer

Edit	Delete	Line #	Veh serial num	Your veh num	Type	Manufacturer	Model	MY	Low-use	Low-use outside	Specialty	Emergency	St re
<a href="#">Edit</a>	<a href="#">Delete</a>	2	CFH38923492789	561	Rollers	DEERE	750XL	1994	No	No	No	No	N
<a href="#">Edit</a>	<a href="#">Delete</a>	1	RJS382938998	560	Rubber Tired Loaders	DAEWOO	450	1999	No	No	No	No	N

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## Adding Engine Information

Explanation of terms Enter Data

Veh serial num	Your veh num	Eng serial num	Manufacturer	Model
RJS382938998	560		no engine manufacturer	

Edit	Line #	Veh serial num	Your veh num	Eng serial num	Manufacturer	Model	Eng Family	Model Year	Max HP	Displacement (liters)
Edit	2	CFH38923492789	561	5245234534534	Kohler Company	435	5234gr34543	2008	314	23
Edit	1	RJS382938998	560							

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## Viewing Your Fleet Data

erial num	Your veh num	Type	Manufacturer	Model	MY	Low-use	Low-use outside	Specialty	Emergency	Snow removal	Agriculture
0D7809893		Off-Highway_Trucks	DEERE	350DW	2007	No	No	No	No	No	No
0D7810629		Off-Highway_Trucks	DEERE	350DW	2007	No	No	No	No	No	No
4JZ600890		TractorsLoadersBackhoes	DEERE	644JX	2006	No	No	No	No	No	No
4JZ609674		TractorsLoadersBackhoes	DEERE	624JX	2005	No	No	No	No	No	No
4JZ609640		TractorsLoadersBackhoes	DEERE	624JX	2006	No	No	No	No	No	No
4JZ601450		TractorsLoadersBackhoes	DEERE	624JX	2007	No	No	No	No	No	No
4JZ601451		TractorsLoadersBackhoes	DEERE	624JX	2006	No	No	No	No	No	No
4JZ615076		TractorsLoadersBackhoes	DEERE	624JX	2008	No	No	No	No	No	No
4JZ615706		TractorsLoadersBackhoes	DEERE	624JX	2008	No	No	No	No	No	No
4JZ617525		TractorsLoadersBackhoes	DEERE	624JX	2008	No	No	No	No	No	No
4HNS89041		TractorsLoadersBackhoes	DEERE	644HX	2003	No	No	No	No	No	No
4JX600366		TractorsLoadersBackhoes	DEERE	644JX	2006	No	No	No	No	No	No
4JX600814		TractorsLoadersBackhoes	DEERE	644JX	2006	No	No	No	No	No	No
4JX607476		TractorsLoadersBackhoes	DEERE	644JX	2007	No	No	No	No	No	No
4JX607480		TractorsLoadersBackhoes	DEERE	644JX	2007	No	No	No	No	No	No
4JZ616781		TractorsLoadersBackhoes	DEERE	644JX	2008	No	No	No	No	No	No
2DX617195		Graders	DEERE	672DX	2008	No	No	No	No	No	No
4JX606666		TractorsLoadersBackhoes	DEERE	744JX	2007	No	No	No	No	No	No
2DX611787		Graders	DEERE	872DX	2007	No	No	No	No	No	No
2DX618153		Graders	DEERE	872DX	2008	No	No	No	No	No	No

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## DOORS – Excel Spreadsheets

What if you already have your inventory information in a spreadsheet?

Download Excel Spreadsheet from ARB

Insert your information

Save the spreadsheet as a .PRN

Upload the files to ARB

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## DOORS – Excel Spreadsheets

What if you already have your inventory information in a spreadsheet?

“enter a fleet” – “Upload Fleet Data”

enter a fleet

An \* indicates fleets that you have submitted for ARB review.

Upload Fleet Data

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## After Uploading the Spreadsheet

erial num	Your veh num	Type	Manufacturer	Model	MY	Low-use	Low-use outside	Specialty	Emergency	Snow removal	Agr. culture
DD7006893		Off-Highway_Trucks	DEERE	350DW	2007	No	No	No	No	No	No
DD7610629		Off-Highway_Trucks	DEERE	350DW	2007	No	No	No	No	No	No
4J2000860		Tractors/Loaders/Backhoes	DEERE	644JX	2006	No	No	No	No	No	No
4J299574		Tractors/Loaders/Backhoes	DEERE	624JX	2005	No	No	No	No	No	No
4J339540		Tractors/Loaders/Backhoes	DEERE	624JX	2005	No	No	No	No	No	No
4J2011450		Tractors/Loaders/Backhoes	DEERE	624JX	2007	No	No	No	No	No	No
4J2011451		Tractors/Loaders/Backhoes	DEERE	624JX	2006	No	No	No	No	No	No
4J2616076		Tractors/Loaders/Backhoes	DEERE	624JX	2008	No	No	No	No	No	No
4J2616076		Tractors/Loaders/Backhoes	DEERE	624JX	2008	No	No	No	No	No	No
4J2617525		Tractors/Loaders/Backhoes	DEERE	624JX	2008	No	No	No	No	No	No
4H958041		Tractors/Loaders/Backhoes	DEERE	644HX	2003	No	No	No	No	No	No
4J6000366		Tractors/Loaders/Backhoes	DEERE	644JX	2006	No	No	No	No	No	No
4J6000814		Tractors/Loaders/Backhoes	DEERE	644JX	2006	No	No	No	No	No	No
4J607478		Tractors/Loaders/Backhoes	DEERE	644JX	2007	No	No	No	No	No	No
4J607450		Tractors/Loaders/Backhoes	DEERE	644JX	2007	No	No	No	No	No	No
4J2616781		Tractors/Loaders/Backhoes	DEERE	644JX	2008	No	No	No	No	No	No
2DX617195		Graders	DEERE	672DX	2008	No	No	No	No	No	No
4J6066666		Tractors/Loaders/Backhoes	DEERE	744JX	2007	No	No	No	No	No	No
2DX611787		Graders	DEERE	672DX	2007	No	No	No	No	No	No
2DX618153		Graders	DEERE	672DX	2008	No	No	No	No	No	No

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## DOORS – Excel Spreadsheets

DOORS saves the information

Update / Review it later

Reporting Home Upload Fleet Data View Owner View Fleet Request Review Done

Request ARB Review

-Receive EINs to label vehicles

Make changes later in online forms

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## Hardcopy Forms

- Similar format to the Excel Spreadsheets
- Currently under development
- Will be available from the “Reporting Forms” page directly off of the Off-road Diesel Homepage

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## After ARB Reviews the Data

The screenshot shows a software interface with a dropdown menu open. The menu items are: View EINs, Add/Edit Owner/Fleet, Buy/Sell/Repower Vehicle, Reassign Vehicle, Claim Early Credit, Compliance Plan, Certificate of Reported Compliance, View Fleet History, and View EINs. A red box highlights the 'View EINs' option. To the right of the menu, there is a 'Take Action' button and an 'Exit' button. Below the menu, there is a text label 'red by ARB.' and another 'Take Action' button and 'Exit' button.

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## Fleet Information and EINs

Download As CSV

Line #	EIN	Veh serial num	Your veh num	Type	Manufacturer	Model	MY	Eng serial num	Engine manufacturer
1	A16U18	okl35579	hx123	Cranes	ZETTELMAYER	550G	1983	dsf0269	Detroit_Diesel_Corporation
2	A20M49	huy3868	uio68	Graders	MOSA	sadfasdf	1987	jkj915	Cummins_Inc.
3	A38009	gty2826	uio80	Crawler_Tractors	CATERPILLAR	TSI37	2000	yht3290	Cummins_Inc.
4	A46L07	gty2857	uio111	Graders	FIATALLIS	2366	2002	yht3321	Cummins_Inc.
5	A62S00	huy3838	uio38	Graders	A_M_SNOWBLAST	sadfasdf	2007	jkj885	Kohler_Company
6	A89R64	gty2839	uio93	Graders	BOBCAT	etwerwtyr	2006	yht3303	Wartsila_North_America_Inc.
7	B02Z79	okl35580	hx124	Other_Material_Handling_Equipment	CASE	etwerwtyr	1976	dsf0270	Cummins_Inc.
8	B08N16	huy3843	uio43	Tractors/Loaders/Backhoes	HEM	TSI38	1991	jkj890	Wartsila_North_America_Inc.
9	B29P23	huy3841	uio41	Rubber_Tired_Loaders	GENERAL_MOTORS	234	2003	jkj888	Caterpillar_Inc.
10	B67E00	okl35557	hx101	Scrapers	MANITOWOC	222B WEST	2006	dsf0247	Caterpillar_Inc.
11	B77S02	okl35543	hx127	Off-Highway_Tractors	MUSTANG	etwerwtyr	1983	dsf0233	Onan_Cummins_Power_Generation
12	B79S70	huy3853	uio53	Graders	CATERPILLAR	550H	2003	jkj900	Kubota_Engine_America_Corporation
1	B98O46	huy3850	uio50	Pavers	MCNEILUS	236	2007	jkj897	Caterpillar_Inc.
2	C50K92	huy3837	uio37	Cranes	MANITOWOC	222B WEST	1999	jkj884	Cummins_Inc.
3	C58P28	okl35554	hx98	Off-Highway_Tractors	MUSTANG	etwerwtyr	1983	dsf0244	Onan_Cummins_Power_Generation

## Compliance Planning (in progress)

- Defaults to automated or customize as needed
- Calculate compliance for a thousand vehicle fleet in minutes

del Year	Turnover	Retrofit	Turnover & Retrofit			
ID	EIN	2008	2009	2010	2011	2012
	A16U18	2001	2001	2001	2011	2011
	A20M49	2007	2007	2007	2007	2007
	A38009	1997	1997	1997	1997	1997
	A46L07	1999	1999	1999	2011	2011

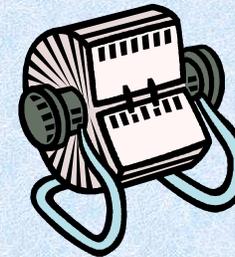
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## Reporting Tool: DOORS

- Staff currently looking for fleets to use DOORS and get EINs early
  - Email [doors@arb.ca.gov](mailto:doors@arb.ca.gov) for information
  - Advantage for fleets to
    - Receive EINs early
    - Get more than 30 days to label vehicles (until 30 days after reporting deadline)
- Help us help you

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## ARB Website and Contacts



California Environmental Protection Agency  
Air Resources Board



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In-Use Off-Road Vehicle Regulation Homepage:  
[www.arb.ca.gov/msprog/ordiesel/ordiesel.htm](http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm)

Home Programs Rulemaking Board Meetings Laws & Regulations Data & Statistics Permits, Etc. Events

IN-USE OFF-ROAD DIESEL VEHICLE REGULATION

Monday, August 25, 2008 *This page last reviewed August 22, 2008*

**UP LINKS**

- ARB Programs
  - Diesel Program
    - Mobile Vehicles and Equipment
  - Mobile Sources
    - Off-Road Diesel

**LOCAL LINKS**

- Archived Documents
- Background
- Contacts
- Current Regulation
- Fact Sheets
- Fleet Average Calculators
- Frequently Asked Questions (FAQ)

**Quick Links**

- Overview & Fact Sheets
- Free Training Seminars
- Reporting Forms
- Compliance Planning Tools
- Regulation Language

On July 26, 2007, the Air Resources Board (ARB) adopted a regulation to reduce diesel particulate matter (PM) and oxides of nitrogen (NOx) emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations. For more information you can call the diesel vehicle information hot line at (866) 6-DIESEL or (866)



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## Off-Road Contacts

**General Off-Road Regulation Questions:**

**Kim Heroy-Rogalski, Manager  
Off-road Implementation Section**  
[kheroyro@arb.ca.gov](mailto:kheroyro@arb.ca.gov)  
(916) 327-2200

**Elizabeth Yura, Staff**  
[eyura@arb.ca.gov](mailto:eyura@arb.ca.gov)  
(916) 323-2397

Diesel vehicle information hot line:  
(866) 6-DIESEL  
(866) 634-3735

**ORIAG:**

**Beth White, Staff**  
[eiwhite@arb.ca.gov](mailto:eiwhite@arb.ca.gov)  
(916) 324-1704

**DOORS:**

**Cory Parmer, Staff**  
[pparmer@arb.ca.gov](mailto:pparmer@arb.ca.gov)  
(916) 323-1180

**Carl Moyer Program:**

**Dinh Quach**  
[dquach@arb.ca.gov](mailto:dquach@arb.ca.gov)  
(626) 350-6485

Off-Road Regulation - [www.arb.ca.gov/msprog/ordiesel/ordiesel.htm](http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm)  
Verified Devices - [www.arb.ca.gov/diesel/verdev/verdev.htm](http://www.arb.ca.gov/diesel/verdev/verdev.htm)  
Carl Moyer Program - [www.arb.ca.gov/msprog/moyer/moyer.htm](http://www.arb.ca.gov/msprog/moyer/moyer.htm)

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