

Frequently Asked Questions In-Use Off-Road Diesel Vehicle Regulation

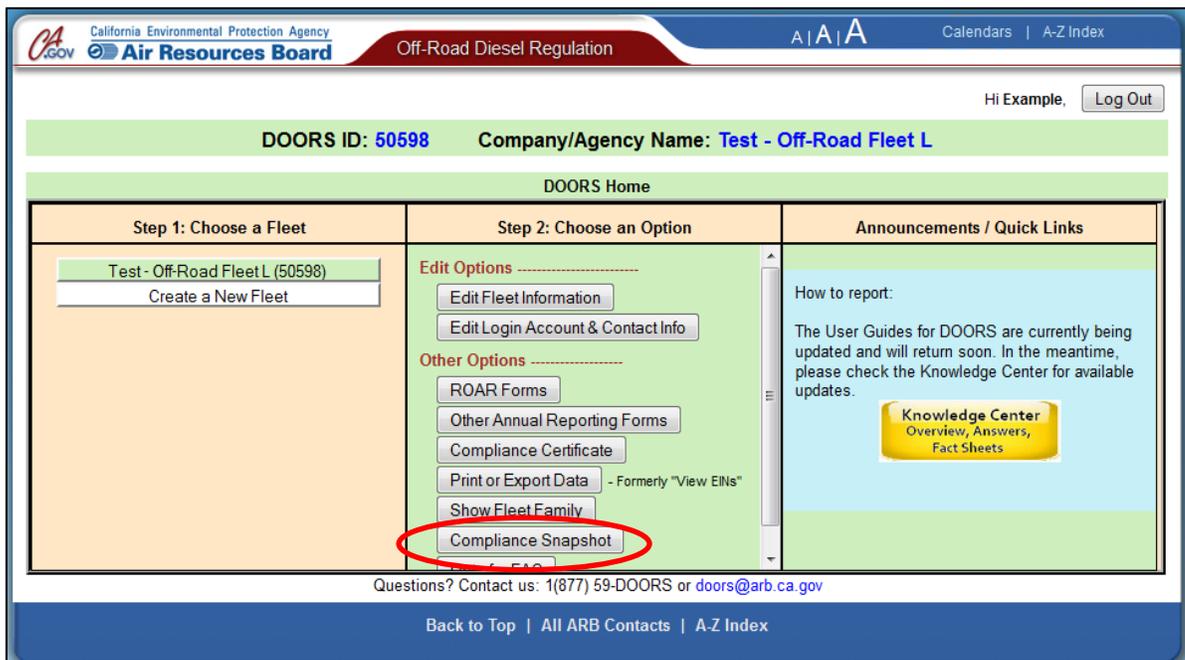
Compliance Snapshot in DOORS July 2013

Q – What is the DOORS Compliance Snapshot?

A – The Diesel Off-Road Online Reporting System (DOORS) Compliance Snapshot is a page available to each DOORS fleet, in their DOORS account, that shows where the fleet stands in regards to the next compliance date, upcoming performance requirements (e.g., fleet average targets and Best Available Control Technology or BACT requirements), and any BACT credits that have been earned. The information contained in the Compliance Snapshot is based on the information reported by the fleet in DOORS as of the moment it is accessed. The Compliance Snapshot does all Off-Road Regulation compliance-related calculations for the fleet, including determining the fleet's total max horsepower (hp), fleet average targets, fleet average index, required BACT amounts, and BACT credits.

Q – How do I access my fleet's Compliance Snapshot?

A – After logging into your DOORS account, select the fleet you wish to view, and then select the Compliance Snapshot button in the middle column, as shown below:



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Q – What information does the Compliance Snapshot provide?

- A – The Compliance Snapshot contains several sections:
- Opening summary paragraph and Current Fleet Statistics table
 - Fleet Target and Average Emission Rates table
 - Requirements table
 - Compliance Summary table
 - Credit Summary table

Each of these sections are described and illustrated below.

Opening Summary Paragraph and Current Fleet Statistics Table

The top of the Compliance Snapshot page provides the fleet’s current compliance status and next required compliance date, followed by a summary of current fleet statistics, including fleet size, number of vehicles (and number of vehicles that are designated as low-use or exempt from the regulation’s performance requirements, as well as number of vehicles that are certified to a different standard or are non-diesel), the total horsepower of vehicles included in the fleet average, and the fleet’s first compliance date based on fleet size.

Your fleet, as currently reported, has met the off-road regulation requirements through the January 1, 2015 compliance date because it has earned BACT credits that will be applied towards the required BACT amounts through the January 1, 2015 compliance date. You will need to take action prior to December 31, 2015 in order for your fleet to be in compliance on January 1, 2016.

*This determination is based on the make up of your CURRENT fleet in DOORS, which includes age and horsepower of engines, retrofits (if any), vehicles sold (credits, if any), exempt vehicles such as Low Use (if any), subfleets (if any), and other credits (if any).

Current Fleet Statistics

Fleet Size	Large
Number of Vehicles:	
In Fleet Average	10
Low Use	0
Exempt Not Low Use	0
Total Vehicles	10
Total Horsepower (in fleet average):	7,000
First Compliance Date	January 1, 2014
Next Required Compliance Date	January 1, 2016

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Fleet Target and Average Emission Rates Table

The Compliance Snapshot provides an average of the fleet’s current emissions (fleet average) in grams per brake horsepower-hour (g/bhp-hr) and fleet average targets for the first required compliance date (based on fleet size) and subsequent years, as shown below. The fleet averages and targets are for oxides of nitrogen (NOx) emissions and are based on the current vehicle and engine information the fleet has reported into DOORS.

Fleet Target and Average Emission Rates (g/bhp-hr)											
Target Year	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Target	none	6.1	5.6	5.2	4.6	4.0	3.4	2.9	2.3	1.7	1.5
Average (current)	8.1										

Requirements Table

The Requirements table again shows the fleet average as well as the following: the next year the fleet average target has not been met (January 1st compliance date); exemption from 2014 requirements (if applicable)¹; the required BACT amount for the next required compliance date (which can be met in lieu of meeting the fleet average target); the current amount of BACT credits the fleet has earned that can be applied towards meeting the BACT requirements; the compliance year through which the credits can be used to meet the BACT requirements; the amount of BACT credits remaining (that will carry over to the following year); and the next required BACT amount for that following year.

In the example “Requirements” table shown below, the fleet has a current fleet average of 8.1 g/bhp-hr and an initial target of 5.6 g/bhp-hr. It is exempt from the 2014 compliance requirements. It has enough credit to meet the January 1, 2015, compliance date requirements and still has 490 hp BACT credit remaining.

¹ Large fleets that have, as of March 1, 2010, earned BACT credits in excess of 8 percent of their March 1, 2009 total fleet horsepower are exempt from the January 1, 2014 fleet average and BACT requirements (section 2449.2(b)(7)).

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Requirements	
Your Current Fleet Average:	8.1
2015 Fleet Target:	5.6
Exemption from 2014 requirements, (Delayed Requirements for Early Compliance):	Yes
Required BACT for January 1, 2015:	560 hp (8% of fleet hp at the end of 2013)
Current BACT Credit:	700 hp, + 350 hp after 2014
By using your credit, your fleet can comply through:	2015
in which case your unused credit would be:	490 hp
Required BACT for January 1, 2016:	560 hp (8% of current fleet hp)

To be in compliance each year, the fleet average must be lower than or equal to the fleet target, OR the fleet must meet the required BACT amount.

Compliance Summary Table

The Compliance Summary table summarizes how compliance has been or can be met based on the current fleet average and existing BACT credits. In the example below, the fleet has enough credit to meet the January 1, 2015, compliance date requirements with 490 hp BACT credit remaining.

Compliance Summary					
Calendar Year	Begin Credit	Credit Use	End Credit	Compliance Method	BACT Requirement
2014	1,050	na	1,050	Exemption from 2014 requirements	na
2015	1,050	-560	490	Credit used	8% * 7000 = 560

Credit Summary Table

The Credit Summary table (below) shows each BACT credit that is available in the Off-Road Regulation through turnover and/or installing verified diesel emission control technologies (VDECS), and the corresponding amount of credit the fleet has earned. Each credit provision in the regulation is referenced so that the fleet can click on the reference to view the actual regulatory text.

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Credit Summary		
Reference Regulation Section 2449.1(b)	These credits are provided in sections of the regulation cited in the right column You may show or hide individual credit details by clicking the labels or <input type="button" value="Show All Credit Details"/>	Horsepower Credit (Rounded)
(13)	Early Repowers/Rebuilds	700
(14)	Early Replacement	0
(15)	Early VDECS Double Credit - Highest level PM VDECS credit - NOx + Not highest level PM VDECS credit - NOx + Highest level PM VDECS credit	0
(16)	Early Reduced Fleet HP (only to be used after 2014)	350
(17)	2010-2011 Reduced Fleet HP	0
(18)	Interim Replacement/Retirement	0
(10)(A)	Turnover - Beginning on January 1, 2013 - Retirement - Permanent Low-Use - Repower / Rebuild (higher tier)	0
(10)(B)-(D)	VDECS- Beginning on January 1, 2013 - Highest level PM VDECS credit - NOx + Not highest level PM VDECS credit - NOx + Highest level PM VDECS credit	0
(11)	Excess PM VDECS credit used for compliance with the off-road and the truck and bus regulations - Credit From Truck and Bus = 0 hp - Credit Given to Truck and Bus = 0 hp	0
Total Credits		700 Hp, + 350 Hp after 2014

Clicking each credit provision, or clicking the “Show All Credit Details” button, will display the vehicles associated with the credit (if applicable) and the calculation for the credit, as shown below.

Early Repowers/Rebuilds										700
Repower before March 1, 2009										
EIN	Owner ID	Vehicle Type	Manufacturer	Vehicle Model	Engine Purchase Date	Engine Model Year	Engine Tier	HP	Credit	
HP6W58		Crawler Tractors	CATERPILLAR	C14	2007-01-01	2007	T3	700		
Removed Engine for HP6W58					1994-01-01	1994	T0	700	700	
Total									700	

Q – If I report a change to my fleet in DOORS, how long will it take to be reflected in the Compliance Snapshot?

A – Changes made to a DOORS fleet are effective immediately. Once a vehicle or engine is added, sold or retired, repowered, or edits have been made to an existing engine model year or hp, the fleet can then go back to their DOORS home page, click to enter the Compliance Snapshot, and immediately see the results of those changes.

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Q – The top of my Compliance Snapshot page states that the page is draft and still under development and testing; can I trust the information displayed for my fleet, and when will the page be finalized?

A – For most fleets, the information displayed in the Compliance Snapshot will be accurate. However, we are still conducting testing to ensure the accuracy, and we urge fleets to contact us if they believe the information displayed is not correct. We hope to finalize the Compliance Snapshot in Fall 2013.

Q – I have several fleets that are linked together by one parent fleet; are the calculations in each of my fleets' Compliance Snapshots based on the individual fleet?

A – The overall fleet size calculation includes the total horsepower of eligible vehicles² in all of the fleets that are under common ownership or control and linked to the same parent in DOORS³.

Example: Fleet P is a parent fleet with three child fleets: Fleet A (2,000 hp), Fleet B (2,000 hp), and Fleet C (1,500 hp). The Compliance Snapshot for each of the fleets will show that they are each large, based on the parent fleet (Fleet P). However, the calculations for fleet average, BACT requirements, and BACT credits are based on each individual fleet (fleet portion). For example, Fleet A's fleet average index, fleet average target, and BACT requirement will be calculated based on the vehicles that exist only in Fleet A, and the credits will be calculated based only on the actions taken within Fleet A.

For additional information on fleet portions and how they report and comply, please see our Fleet Portions frequently asked questions (FAQ) document at <http://www.arb.ca.gov/msprog/ordiesel/faq/fleetportions.pdf>.

Q – My fleet has earned BACT credits; how do I use them?

A – A fleet does not need to take any action to use BACT credits. If the fleet does not meet the fleet average target for the next compliance date, existing BACT credits will automatically be applied to the fleet's BACT requirements. If the fleet takes additional actions, such as additional vehicle or engine turnover or VDECS installations, any credits resulting from those actions will be added to the fleet's existing BACT credit total. Only the amount of BACT credits needed to meet the

² Eligible vehicles mean those that are not exempt from performance standard requirements. Vehicles exempt from performance standard requirements include those designated in DOORS as low-use, dedicated snow removal, 51% to 99% agricultural, emergency-only, or electric).

³ Captive attainment area fleets or fleet portions are subject to the small fleet requirements regardless of overall fleet size. This will be reflected in the Compliance Snapshot for such fleets.

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BACT requirements for the compliance date will be deducted from the fleet's BACT credit total, and any remaining credits will then be carried over to the subsequent compliance date.

Q – My Compliance Snapshot is showing that my fleet average is 0 (zero), even though I have reported vehicles. Is this a mistake?

A – This usually means the fleet has reported an electric or alternative fuel vehicle, and likely needs to report additional information in DOORS. Please see our FAQ on emission factors located at <http://www.arb.ca.gov/msprog/ordiesel/documents/emissionfactorsfaq.pdf> and/or contact the DOORS hotline at 877-59DOORS (877-593-6677), or by email at doors@arb.ca.gov, for assistance.

Q – I purchased an electric forklift to replace my one of my diesel forklifts in February 2006, and I reported that replacement in DOORS. Why don't I see any BACT credit in my Compliance Snapshot for the electric vehicle?

A – Although there is not a specific BACT credit available for the electric vehicle, your fleet would be entitled to BACT credit for Early Reduced Fleet Hp if your overall fleet hp (not including the electric vehicle) were reduced between 3/1/2006 and 3/1/2010. In addition, the electric vehicle may be included in your fleet average index, with an emission factor of 0, and the vehicle is excluded from the calculations for determining your BACT requirements⁴. For compliance dates between 2014 and 2016, the max hp of an electric vehicle purchased on or after January 1, 2007 may be doubled in calculating the fleet average index. The Compliance Snapshot does all of the calculations for you, taking into account the electric vehicle(s) you have reported.

Q – How is my BACT requirement calculated?

A – The BACT requirement is calculated based on the fleet's total max hp of eligible vehicles⁵ at the end of the calendar year (December 31) preceding the last annual reporting date (March 1). For example, the BACT requirement for the large fleet January 1, 2014 compliance date is based on the fleet's total max hp on December 31, 2012, multiplied by 4.8%.

⁴ Electric vehicles must meet specific criteria in order to be reported in DOORS and allowed to be included in the fleet average for compliance with the Off-Road Regulation, as explained in the Emission Factors FAQ at <http://www.arb.ca.gov/msprog/ordiesel/documents/emissionfactorsfaq.pdf>.

⁵ Eligible vehicles mean those that are not exempt from performance standard requirements. Vehicles exempt from performance standard requirements include those designated in DOORS as low-use, dedicated snow removal, 51% to 99% agricultural, emergency-only, or electric).

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Q – My Compliance Snapshot is not showing credit for Interim Replacement/Retirement, even though I retired vehicles in 2011 and 2012; why didn't I get credit?

A – Credit will only be earned if the actions taken to retire and/or replace Tier 0 or Tier 1 vehicles in one calendar year are greater than 8 percent (%) of the total max fleet hp of eligible vehicles³ at the end of that same year (section 2449.1(b)(18)). For actions that are greater than 8%, the credit earned will be the hp retired/replaced that is in excess of the 8%. This credit can be earned during the time periods below:

- Large fleets: actions taken in each calendar year through 2012;
- Medium fleets: actions taken in each calendar year through 2015; and
- Small fleets: actions taken in each calendar year through 2017.

Example 1: Fleet Y is a large fleet with 7,500 total max hp at the end of 2012. During 2012, the fleet retired five Tier 0 and Tier 1 vehicles totaling 1,000 hp. The fleet will earn 400 hp in credit for these actions, as shown in the calculation below:

(hp of tier 0/1 retired/replaced in one year) – (hp of Tier 0/1 added in same year)
– [(total max hp of fleet at the end of the same year) x 8%]

$$1,000 - 0 - [7,500 \times 0.08] = 400 \text{ hp credit}$$

Example 2: Fleet Z is a medium fleet with 4,000 total max hp at the end of 2015. During 2015, the fleet replaced two Tier 0 vehicles totaling 300 hp with Tier 2 vehicles. The fleet will not earn any credit for these actions, because the hp of Tier 0 vehicles replaced was less than 8% of the fleet's total max hp, as shown in the calculation below:

(hp of tier 0/1 retired/replaced in one year) – (hp of Tier 0/1 added in same year)
– [(total max hp of fleet at the end of the same year) x 8%]

$$300 - 0 - [4,000 \times 0.08] = 0 \text{ hp credit}$$

Q – My company repowered a Tier 1 engine with a Tier 2 engine in 2010 and then sold the vehicle in 2011, but my Compliance Snapshot is not showing credit for that repower; why?

A – Credit for an early repower can only be retained for vehicles that remain in the fleet as of the compliance date when the credit is used. Since the repowered vehicle was sold from the fleet before the first compliance date, the credit is lost.

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Q – I purchased a used vehicle that had been retrofitted with a Level 3 PM VDECS; why doesn't my Compliance Snapshot show credit for the VDECS?

A – Credit for installing a verified diesel emission control strategy (VDECS) is only granted to the fleet that owned the vehicle when the VDECS was installed (and that fleet retains the credit, even after the vehicle is sold). However, the purchasing fleet benefits by having the VDECS factor included in their fleet average calculation, and the vehicle will be exempt from BACT requirements for up to six years from the VDECS installation date.

Example: Fleet V installed a VDECS on a 300 hp vehicle in 2011, earning the fleet 600 hp in BACT credit (double credit for early VDECS). Fleet V then sold the vehicle to Fleet W in 2012. Fleet V retains the 600 hp in BACT credit, but the VDECS factor is no longer included in Fleet V's fleet average calculation. Fleet W does not earn BACT credit for the VDECS but gets to include the VDECS factor in their fleet average, and the vehicle remains exempt from BACT requirements through the January 1, 2017 compliance date.

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