

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

### **EIN Labeling FAQ**

**Revised August 2014**

**Q – When will I receive my Equipment Identification Numbers (EINs) after initially reporting my fleet?**

**A –** Fleets that have reported online through DOORS will receive their EINs immediately upon approval of their fleet. EINs are viewable by logging into your DOORS account and selecting “View EINs” from the drop-down menu.

Fleets that have reported via hardcopy forms will have their EINs mailed directly to them.

**Q – Once I receive the ARB issued EINs, what are the requirements for labeling vehicles?**

**A –** After receiving the EINs, fleets must label their vehicles within 30 days. ARB does not supply the EIN labels themselves.

Fleet owners have a choice of how they want to label their vehicles. For example, fleets may label their vehicles with vinyl stickers or aluminum placards or by painting the EIN on the vehicle. The most common method is to use vinyl stickers purchased from a graphics shop, and you may use any vendor that produces labels that meet the label specifications. As a courtesy, ARB has assembled a list of label vendors – see below under “Where can I buy labels?”. Also, label quality is discussed below.

The color of the EIN label is dependent on the type of fleet. Most EIN labels must be white on a red background. However, for captive attainment area fleets, the EIN labels must be white on a green background. [Note to label vendors: off-road fleets self-certify that they are “captive attainment area” fleets, and ARB does not provide documentation or verification of that status.] For more information, please see the Captive Attainment Area Fleets FAQ at [http://www.arb.ca.gov/msprog/ordiesel/faq/captive\\_attainment\\_area\\_faq.pdf](http://www.arb.ca.gov/msprog/ordiesel/faq/captive_attainment_area_faq.pdf).

The EIN label must be located in clear view on both sides of the outside of the vehicle, approximately 5 feet above ground. If the vehicle is not 5 feet tall, the label may be placed lower on the vehicle. Each character of the EIN needs to be at least 3 inches tall and 1.5 inches wide. Furthermore, the EIN must be maintained in a manner that retains its legibility for the entire life of the vehicle.

*While this document is intended to assist fleets with their compliance efforts, it does not alter or modify the terms of any ARB regulation, nor does it constitute legal advice. It is the sole responsibility of fleets to ensure compliance with the In-Use Off-Road Diesel-Fueled Fleets Regulation.*

The photographs below show vehicles labeled with EINs.



**Q – Due to the previous labeling requirements, I only labeled the right (starboard) side of my vehicles. How long do I have to get both sides of my vehicles labeled?**

A – Fleets had until January 1, 2013, to place an identical EIN label on the left (port) side of the vehicle.

**Q – I am a captive attainment area fleet and my vehicles are labeled with EINs on a red background instead of green. How long do I have to change the EIN labels on my vehicles?**

A – Captive attainment area fleets had until January 1, 2013, to change their EINs to green backgrounds and to label both sides of their vehicles.

**Q – Is there more information about the requirements for labels on both sides and for green labels for captive attainment area fleets?**

A – Yes, Regulatory Advisory 12-08 discusses these two topics and is available at <http://www.arb.ca.gov/msprog/mailouts/msc1208/msc1208.pdf>.

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**Q – What if I do not have room on my vehicle to place the EIN? Should I place my EIN vertically?**

A – Fleets are responsible to make every effort to find a place for the label of the appropriate size. However, if it is not possible – for example, if there is physically not a surface that will hold the label horizontally on the right side of the vehicle – a fleet may use a smaller or vertical label. The fleet must make the label as close to the required size as possible in order for it to be legible to enforcement personnel. If ARB's enforcement staff finds labels that are smaller than required or placed vertically without a valid reason, the fleet will be subject to enforcement action. The use of smaller or vertical labels must be for a valid reason; for example, fleets cannot use smaller or vertical labels if there is no room because of existing optional stickers and/or placards on the vehicle. Furthermore, labels should not be placed on a portion of the vehicle that can be detached (for example, the backhoe attachment on a tractor). If you have any questions about labeling, you can contact ARB about your specific situation.

**Q – What is the process for labeling added vehicles?**

A – Once a vehicle has been added to a fleet that has been previously approved in DOORS, an EIN will automatically be assigned. The owner or responsible person has 30 days from then to appropriately label their equipment.

**Q – If I decide to designate my fleet as a captive attainment area fleet, how long do I have before I'm required to change the label colors from red to green?**

A – Fleets must appropriately label their vehicles when a change in captive attainment area designation occurs (green when designating as a captive attainment area fleet, red when un-designating). The re-labeling should occur within 30 days of the change in designation.

**Q – Where can I buy labels?**

A – The ARB does not supply the EIN labels. Instead, fleets that choose to use vinyl stickers or aluminum placards may purchase them or create them in-house. Most graphics shops can produce vinyl stickers. You may use any vendor that can produce labels that meet the label specifications. Graphics shops should be able to produce typical white/red EINs, as well as white/green EINs for captive attainment areas. In order to reduce errors when purchasing labels, fleets may provide the list of their EINs to the label vendor by selecting "Print or Export Data" when logged into their DOORS account. Note that all EINs consist of six characters - two upper case letters, one number, one upper case letter, and then two numbers (for example, "RH4M79"). The letters I and O, and the numbers 1 and 0, are not included in EINs.

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As a courtesy, ARB has assembled a list of label vendors who have demonstrated that they can meet the label specifications, which is available at <http://www.arb.ca.gov/msprog/ordiesel/labelvendors.htm>.

The listed vendors have provided a label to ARB meeting the specifications. However, please note that the listing of these companies does not constitute endorsement by the Air Resources Board.

**Q – Are all vinyl labels the same quality?**

A – No, vinyl labels can be manufactured using different processes, and with a variety of materials with different characteristics and qualities, including adhesion longevity and resistance to fading. Vinyl mounted on an aluminum plate (placard) will only have the longevity of the vinyl.

The two materials most often used for EIN vinyl labels are cast, and polymeric calendered. Monomeric calendered vinyl is generally not appropriate for EIN label applications. A lamination on top helps resist abrasion, and also helps protect against chemicals. ARB staff recommends that you speak to your label vendor for their recommended label material.

In order to compare the quality of labels from various vendors, you may wish to ask if they provide a warranty, or if the vinyl they use has a durability rating (i.e., “5-year outdoor durability rated”).

The Off-Road regulation states that the EIN shall be maintained in a manner that retains its legibility for the entire life of the vehicle (section 2449(f)(2)(D)). Most vinyl labels that were applied in 2009 still meet ARB label specifications three years later. However, some do not. The vinyl label shown below is about three years old, but was probably made from low quality materials. This label does not meet ARB label specifications, as it is no longer legible:



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To clarify, the regulation requires that the EIN be maintained in a manner that retains its legibility for the entire life of the vehicle. This requires that if an EIN label becomes illegible, it must be replaced; it does not require that the original label must last the life of the vehicle.

**Q – Are there specifications for EIN label colors?**

A – The ARB does not have specifications for specific label colors, other than “white” characters with “red” or “green” backgrounds. Vendors and fleets should use their best judgment to ensure the colors are reasonable. Colors similar to the following are what some label vendors have used for regular EINs: Pantone 18-1664 TCX Fiery Red, and Pantone 18-1763 TCX High Risk Red, and vinyl Avery Cardinal Red. Pantone Red 032 C might be too light, especially if there is fading in sunlight. For the captive attainment area green label, colors similar to the following are what some label vendors have used for the EINs: Pantone 17-6153 TPX Fern Green, Pantone 17-6229 TPX Medium Green, and Pantone 348. Pantone Green HC might be too light, especially if there is fading in sunlight.

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