

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

### **Rounding Provision FAQ December 2013**

**Q – What is the rounding provision, and how can it be used to delay BACT requirements?**

**A –** The rounding provision in the Off-Road Regulation (section 2449.1(b)(5)) states that if the horsepower (hp) to meet Best Available Control Technology (BACT) requirements is less than half the max hp of the smallest engine in the fleet subject to BACT requirements, the next vehicle is not required to be turned over or have VDECS installed. However, on the next compliance date, any hp not accounted for because of this rounding provision must be added to the current BACT requirements. Once the required BACT hp is equal to or exceeds half the max hp of the smallest engine, the next vehicle must be turned over or have a VDECS installed on it.

For example, consider a small fleet with three vehicles with 250 hp each for a total of 750 hp. If the fleet cannot meet the fleet average target by January 1, 2019, they must meet the BACT requirement, which is 75 hp (10% of the fleet's total hp). Since 75 hp is less than half the max hp of the smallest engine in the fleet, the BACT requirement would be delayed, and the fleet would not have to take any actions on their vehicles for the January 1, 2019 compliance date. For the next compliance date, January 1, 2020, the BACT requirement is 150 hp (the 75 hp 2019 BACT requirement, plus 10% of the fleet's total hp for the 2020 BACT requirement). Since 150 hp is greater than half 250 hp, by January 1, 2020, the fleet must turn over or install VDECS on one of the vehicles to meet the BACT requirement.

**Q – How does the rounding provision apply to two-engine vehicles?**

**A –** For two-engine vehicles, the rounding provision counts both the drive engine and auxiliary engine hp together. If the required BACT hp is less than half the sum of the max hp of the drive engine and auxiliary engine, neither engine in the two-engine vehicle will be required to be turned over. However, just like with single-engine vehicles, on the next compliance date, any hp not accounted for because of the rounding provision must be added to the current BACT requirements. Once the required BACT hp is equal to or exceeds half the sum of the max hp of the drive and auxiliary engines, the next engine must be turned over or have VDECS installed on it.

*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.*

For example, consider a small fleet with three single-engine vehicles with 500 hp each, and a 2-engine vehicle with a drive engine that has 300 hp and an auxiliary engine that has 150 hp, for a total of 1,950 hp in the fleet. If the fleet cannot meet the fleet average target by January 1, 2019, they must meet the BACT requirement, which is 195 hp (10% of the fleet's total hp). Since 195 hp is less than half the sum of the max hp of the drive engine and auxiliary engine (450 hp), the BACT requirement would be delayed, and the fleet would not have to take any actions on their vehicles for the January 1, 2019 compliance date. For the next compliance date, January 1, 2020, the BACT requirement would be 390 hp (the 195 hp 2019 BACT requirement, plus 10% of the fleet's total hp for the 2020 BACT requirement). Since 390 hp is more than half of 450 hp, by January 1, 2020, the fleet must turn over or install VDECS on either one of the 500 hp vehicles or both engines of the 2-engine vehicle to meet the BACT requirement.

**Q – How will I know if I am eligible for the rounding provision?**

**A –** Fleets whose BACT requirements have been delayed due to the rounding provision will be able to view the delayed requirements on their compliance snapshot once they log into their account in the Diesel Off-Road Online Reporting System (DOORS), as shown below.

Requirements	
Your Current Fleet Average:	6.0
2024 Fleet Target:	4.9
Required BACT for January 1, 2024:	640 hp (hp rounding provision)
Current BACT Credit:	2,000 hp
By using your credit, your fleet can comply through:	2034
in which case your unused credit would be:	0 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					
Calendar Year	Begin Credit	Credit Use	End Credit	Compliance Method	BACT Requirement
2019	2,000	na	2,000	met fleet average	na
2020	2,000	na	2,000	met fleet average	na
2021	2,000	na	2,000	met fleet average	na
2022	2,000	0	2,000	smallest engine rounding*	10% * 2200 = 220
2023	2,000	0	2,000	smallest engine rounding*	220 + 10% * 2200 = 440
2024	2,000	-640	1,360	Credit used	440 + 10% * 2000 = 640

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