



Off-Road Implementation Advisory Group (ORIAG) Minutes

Monday, May 12, 2008

1:30 p.m. – 5:00 (PST)

California Environmental Protection Agency

1001 I Street, Byron Sher Auditorium

Sacramento, California 95814

1) Solicitation of Ideas Regarding Agenda

- a) Would like to discuss enforcement
- b) Would like to discuss repowering large displacement (high hp) vehicles¹

2) ARB Presentation - Regulation Summary and Current Implementation Status

ARB staff gave a presentation summarizing the in-use off-road diesel vehicle regulation and its current implementation status. Staff also provided updates on the Off-road Showcase Demonstration (Showcase) project and the funding pilot project. Comments and suggestions received after the presentation are summarized below by category:

a) Showcase

- i) Will there be rolling applications for the Showcase? The sponsors of the Showcase, the South Coast Air Quality Management District and the Mobile Source Review Committee, will advise when there is another solicitation for the Showcase. Interested parties may sign up for notification of showcase activities and future solicitations, if any, at <http://www.arb.ca.gov/listserv/listserv.php>. Select All Lists; the description of the relevant list is Showcase Off-Road Diesel Retrofit Project.
- ii) Asked what the time between order of VDECS under the showcase and installation of VDECS has been and expressed concern that this has been many months. The timing encountered in the Showcase is not representative of what VDECS buyers can expect in the future. Contract issues have slowed installation of VDECS under the showcase beyond the typical timelines ARB

¹ The minutes are written using the following conventions:

- If a sentence begins with a verb, the subject is understood to be "A meeting attendee." If the first sentence is a statement, it is an opinion or suggestion from a meeting attendee.
- If the first sentence is a question, it is understood to be a question of a meeting attendee.
- If ARB staff provided an explanation or answer, that answer is provided after the question or comment.
- Text is highlighted where ARB staff has provided additional information beyond what was presented at the May 12 meeting.

staff expects during rule implementation. We expect in the future the typical time between ordering of VDECS be 4 to 8 weeks.

b) Verified Diesel Emission Control Systems (VDECS) and Verification Process

- i) Can ARB give tax credits for installation of VDECS? This is outside of ARB's regulatory authority.
- ii) Can stakeholders be notified of DECS that are undergoing the verification process? We cannot discuss applications that are in process. ARB will, however, advise interested parties, via the website and listserv, once a DECS has been verified. Interested parties may sign up for notification of information regarding verification at <http://www.arb.ca.gov/listserv/listserv.php>. Select All Lists; the description of the relevant list is Diesel Retrofit Program.
- iii) Procrastination may cause fleets to fall behind on compliance. Suggested that it would be helpful for VDECS manufacturers to publicize timelines required for installation.
- iv) Expressed concerns regarding ARB spending too much of their resources reviewing verification applications for unfeasible or technically unsound DECS. ARB is obligated to review all verification applications that are submitted to us. However, the verification process allows us to winnow out applications that are technically unsound.
- v) Asked how fleet owners can access information and provide feedback regarding which VDECS works for which vehicles. Said ARB needs to make it easier to find what is verified. Currently, information regarding which devices are verified for which engines is available in the form of Executive Orders for each verified device. For example, Executive Orders for verified level three devices are available at <http://www.arb.ca.gov/diesel/verdev/level3/level3.htm>. A privately developed searchable website of verified devices is available at <http://www.airqualitycs.com/decs.php>. Please note that this website is not endorsed by ARB and has not been checked by ARB staff.
- vi) Expressed concerns that VDECS may not work, particularly for high horsepower, large displacement vehicles (> 300 hp). Expressed concerns that for some vehicles, by the time an appropriate VDECS becomes available, it will be too late to meet the March 1, 2009 deadline for double credit.
- vii) Asked if the deadline for providing early double credit could be extended beyond March 1, 2009. This would require a change to the regulation. However, as long as a fleet owner has purchased the VDECS before November 1, 2009, the manufacturer delay provisions will allow that VDECS to count double, even if it is not installed until after March 1, 2009.
- viii) Expressed concerns regarding long regeneration times (which equals down time). Expressed concerns that it is not feasible to regenerate at lunchtime.
- ix) Can ARB guarantee parity of pricing for VDECS? ARB cannot control the prices offered by VDECS sellers.
- x) Suggested ARB provide examples of verification data provided for successful verifications. We have done this and also held a workshop for DECS

manufacturers to learn more re: the verification process. The ARB presentation from the workshop is available at <http://www.arb.ca.gov/msprog/ordiesel/oriag/meetings/051208/gen-pres.pdf>.

- xi) Asked if the verification process includes involvement of original equipment manufacturers (OEMs). The verification process does not explicitly include OEMs, however, the regulation states that if the device manufacturer and installer do not agree a device can be safely installed, it is not considered verified.

c) Surplus Off-road Opt-in for NOx (SOON)

- i) Would like to have SOON and how it fits in with the regulation explained further at the next meeting.
- ii) Expressed concern that SOON is not uniform statewide.
- iii) Asked what SOON's affect on Moyer funds availability? Moyer incentive money is used to fund the additional NOx reductions from SOON – it is a way for large fleets to access Moyer funds. The existence of SOON does not limit fleets eligibility for traditional Moyer funds.

3) Diesel Off-road On-line Reporting System (DOORS) Demo

ARB staff gave a demonstration of a DOORS prototype to solicit input. When the prototype for DOORS is ready for public use, it will be posted on our webpage under What's New? and staff will notify the regulation listserv of its availability.

Meeting participants made the following suggestions:

- a) Add a field for verification year as part of the VDECS description.
- b) Include a field so users can enter equipment identification numbers (EINs) once they are assigned.
- c) Upload all of the information into one spreadsheet rather than four different ones. Minimize requiring users to enter the same data over and over again
- d) Put the line number next to the error to make it easier to find it and fix it.
- e) A drop down menu for equipment manufacturers is not feasible, because it will be too big (~ 700 manufacturers).
- f) How will the database accommodate vehicles with two drive engines? The engine sheet will allow a user to enter two engines for one vehicle.
- g) The Model field does not have a drop-down menu and there will be problems with different terminology being used for the same model.
- h) Some flexibility engines do not have a family name. Stakeholders mentioned that PERP requires a photograph of the engine label. The PERP training contains detail on how to determine the engine family name.
- i) Would be nice if DOORS included standard costs or an ability for fleets to enter own costs. ARB staff will consider adding this to DOORS or the fleet average calculator.
- j) Add to the red triangle in the model year field (where instructions and definitions go), how model year is defined.
- k) It is not good to choose a VDECS family name from a drop down menu – person may choose first one in error.

- l) Stakeholders would like an easily printable output (text) file for their own reporting and troubleshooting purposes. Printable output should include EINs once they are assigned.
- m) Need to address what data if any that is reported to DOORS will be shared with the public or air districts.
- n) Need to add a field for reporting locations, so subfleets can report independently. Need to enable DOORS to handle two subfleets reporting separately but that have the same federal tax identification number.
- o) Concerns were expressed regarding language issues and barriers to companies that do not own computers. Hard copy reporting and ARB staff help are both available to address these concerns.
- p) Suggested that ARB needs to provide more clarity on what happens if a fleet fails to report something. Which fields can ARB live without?

4) Statewide Training/Outreach Discussion

- a) Additional training locations should be: Ventura and somewhere near Redding/Eureka (North Coast).
- b) Public Relations/Media personnel from ARB should attend the next ORIAG meeting. Can they help us with outreach, provide media lists?
- c) Outreach should be at different times of the day at the same location. Most attendees did not believe weekend sessions would be heavily attended.
- d) July and August are a difficult time for contractors to attend trainings because it is their busiest season. ARB should also offer training after that time.
- e) ARB should set up a blog or on-line user group to spread the word about the regulation.
- f) ARB should provide a flyer to dealers to hand out regarding the regulation.
- g) ARB should also provide the handout to schools and hospitals.
- h) What budget does ARB have for outreach?

5) Frequently Asked Questions (FAQs) and Guidance Discussion

- a) Topics that should be covered in FAQs and Guidance:
 - i) Who is responsible for upgrades for rental and leased equipment?
 - ii) On-road versus off-road regulatory applicability
 - iii) Incorporating electrification into fleet
 - iv) How cranes will be handled, particularly lattice boom cranes
 - v) Need further discussion of how rule handles used VDECS. Can VDECS be moved to another vehicle?
 - vi) More precision on how dates work in the regulation.
 - vii) Unverified DECS
- b) How to find engine family name. Photos of engine labels would be helpful.
- c) FAQs will be posted on webpage upon completion – fact sheets are currently being updated and updated fact sheets will be posted soon.
- d) Can ARB guarantee if someone follows the guidelines and FAQs that they will not be subject to enforcement action?
- e) Need to make guidelines simple enough for unsophisticated owners and operators to understand.

6) ORIAG Organization and Planning

- a) Would like as much notice as possible for upcoming meetings.
- b) Future meeting topics should include:
 - i) Verification process
 - ii) Enforcement
 - iii) Showcase
 - iv) Idling
 - v) SOON
- c) Suggestions for subcommittees:
 - i) Fleet owners (types of fleets and their special needs)
 - ii) Outreach
 - iii) Guidance Documents
 - iv) VDECS

7) Public Comment Period

- c) Dealers need a good Fact Sheet for talking to customers.
- d) DOORS should have a registration number for out-of-state fleets, not just certificate.