



Off-Road Implementation Advisory Group

September 26, 2008

California Environmental Protection Agency
Air Resources Board



Agenda

1. Presentation – VDECS How-To
2. Regulation Implementation Update - ARB
3. Subcommittee Reports
4. Public Comment Period

E-mail questions to: onair@arb.ca.gov

VDECS How-To

Rasto Brezny
Manufacturers of Emission Controls Association

Regulation Implementation Update

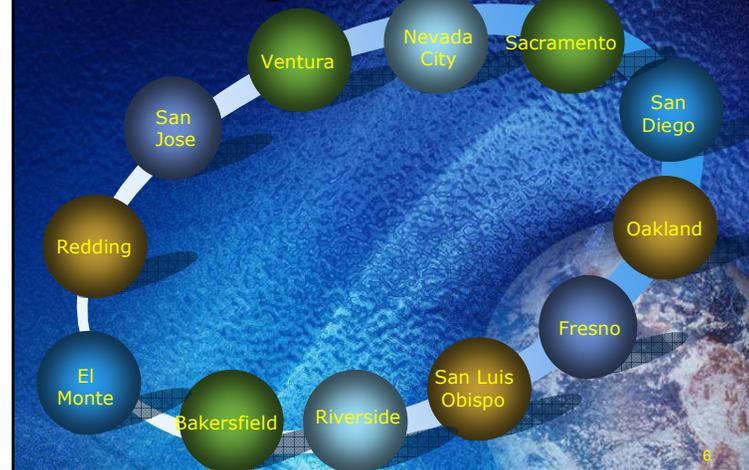
- Outreach
- Demonstration Projects
- DOORS
- Installation Clearinghouse
- U.S. EPA Waiver
- Two-Engine Crane Amendment
- Data from Engine Manufacturers
- Guidance Documents
- Safety

Outreach

- Statewide training sessions
- Speaking to interested groups
- Contractors State License Board



Training Session Locations



Getting Word Out for Trainings

- 12,000 flyers
- Hundreds of phone calls
 - Largest construction companies
 - Dealers
- E-mail lists
 - Portable equipment, public fleets, Moyer, etc.
- Newspapers
 - Free advertisements
- Air districts

Training Session Statistics

- 12 locations
- ~1,300 attendees total
- ~ 3 hours long each
- Feedback forms
 - Very positive
 - Over 4.3 on scale of 1 to 5 (no to yes) in answer to questions:
 - Was it worthwhile to attend?
 - Presenter knowledgeable?
 - Understood material presented?

Training Session Content

- Presented:
 - Background: need for regulation and retrofits
 - Regulation requirements in detail
 - Reporting system (DOORS)
 - Compliance planning tools
 - Contact info
- Good suggestions
 - Example: creating a list of label vendors on our website
- DVD currently being made from Sacramento webcast
- Slated to schedule more sessions in the fall/winter

Most Common Questions

- What are engine Tiers?
- How do I report if I'm missing information about vehicles or engines?
- What will the cost of the regulation be?
- Is there a way to make operators, and not owners, responsible for idling violations?
- How do I demonstrate to ARB that there are no available options to retrofit, repower or replace my vehicles?
- For sales disclosure, what about auction houses and trade-ins?

Speaking to Interested Groups

- In the past two months:
 - 7/22: Diamond D Engineering and Associates
 - 8/6: Attended Ritchie Brothers auction and distributed materials
 - 8/21: Building Industry Association
 - 8/27: Maintenance Superintendents Association
 - 8/28: Tahoe Truckee Sierra Disposal
 - 9/10: Rush Enterprises
 - 9/10: AGC
 - 9/17: Public Works Event / AGC

Upcoming Presentations

- 10/3: Tractoerfest
- 10/14: Concrete Modification Contractor's Association
- 10/21 – 10/22: IEA/CMTA/CICC Statewide Environmental Summit in San Diego - "Navigating in an Ever Greening World"
- 11/10: California GCSA

Contractors State License Board

- Article on the Regulation in the Summer 2008 newsletter
 - Sent to all licensed contractors in CA
- Reached hundreds of small contractors for the first time (175 calls)
- Currently working with CSLB to:
 - Include regulation info in other communications they send to contractors
 - Coordinate enforcement

Demonstration Projects

- **SEP**
 - I: 15 installations in Southern California (Chevron - \$300,000)
 - II: 12 installations in Southern California (Valero - \$200,000)
 - III: 12 installations in Northern California (Valero - \$200,000)

Showcase

- **4 installations complete**
- **Some contract delays**
- **25 to 40 vehicles expected to be retrofitted by the end of the year**



DOORS Status



- Released online September 3, 2009
- Staff **strongly** encouraging early reporting
- As of September 23, 2008:
 - 22 fleets/sub-fleets with 3,510 vehicles have reported and received their Equipment Identification Numbers (EINs) so far
 - 39 fleets/sub-fleets with 1,550 vehicles have entered data and could request EINs soon
- Email address for DOORS questions
 - doors@arb.ca.gov

Early Reporting and Labeling

- If report early, EINs must be affixed by 30 days after initial reporting deadline
 - May 1, 2009 for large fleets, etc.
- If not reported early, EINs must be affixed within 30 days of receipt
- Fleets may report and request EINs any time between now and the initial reporting date
 - Reporting early will give fleets more time to label vehicles
 - If initial reporting is done early and fleet changes prior to March 1, 2009, fleets may make changes up to the reporting date



DB8B97

DOORS – In Progress

- Compliance planning tools customization
- Identifying and answering FAQs
 - Identifying unique circumstances
- Hardcopy: forms and reporting process
- DOORS help hotline
- Help materials to be included w/ EIN mailer



Guides and Field Definitions

- Guides:
 - Report using spreadsheets
 - Reporting using online forms
 - Cut and paste into the spreadsheets
- Field definitions for:
 - Owner
 - Vehicle
 - Engine
 - VDECS information
- Guides in progress:
 - Subfleets
 - Reporting with missing information

DOORS – Future

- Encourage early reporting
 - Suggestions for outreach welcome
- Continue to encourage feedback
- Monitor “customer” support for quality and timely responses
- Continued development

Installation Clearinghouse

- Voluntary submittal of successful VDECS installations to be shared online
 - Details on vehicle, engine, VDECS, and installation method
 - Pictures
- Small initial pool of data
- Encourage participation and submittals
- How to get fleets/installers to provide data?
- Contact: Cory Parmer, parmer@arb.ca.gov

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Clearinghouse Mock-up

Device	Equipment
Caterpillar Diesel Particulate Filter Passive Configuration	2007 Caterpillar 825 H Compactor
VDECS Family: CA/CAT/2008/PM3/NO0/OFF/DPF01	Engine: 2007 Perkins 3054C Horsepower: 124 Engine Family: 7CEXLO27AAK Displacement: 2.7L
ARB Verification Page Manufacturer Website	
Installation Comments	
The filter was bolted to left side of the panel behind the engine access door. Three sections of pipe were installed on the exhaust to bring it to the filter, with an elbow going on the exhaust pipe, then another elbow over the left rear wheel fairing, and then routed into the filter. The exhaust from the filter was lifted an additional 2.5 feet over the device to meet safety standards for exhaust.	



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U.S. EPA Waiver

- Need waiver to fully enforce regulation
- Waiver request submitted to U.S. EPA on August 12, 2008
 - On our website at <http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm>
 - U.S. EPA Hearing to be scheduled

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Two-Engine Crane Amendments

- ARB proposing to add two-engine cranes to off-road regulation
 - To be considered in December 2008 as part of truck and bus rule package
 - Both engines pulled into off-road regulation
 - Cranes removed from portable engine registration and ATCM requirements
- Will not affect SOON status of fleets with such cranes



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Engine Manufacturer Letter

- Requested look-up table giving engine serial numbers and engine family names for all off-road engines that have been produced
 - Will help with DOORS entries
 - Will help with installation of correct VDECS
- 3 manufacturers provided data
- Limited cooperation from American manufacturers to date

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Guidance Documents and FAQs

- FAQs
 - Portable Equipment
 - Labeling
 - Early Credit
 - Engine Model Year
 - Public Fleet Size
- Guidance Documents
 - Enforcement of Requirements to Use On-Road Certified Engines in On-Road Registered Vehicles
 - Agricultural
 - Written Idling Policy



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Documents Currently Under Review

- On-road engines in off-road vehicles
- Feasible VDECS regeneration times and what to do if only VDECS available is plug-in and there is no feasible power source
- De-verified devices
- Yard Trucks

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Safety Subcommittee

- Safety standards assembled, reviewed, summarized, and applicable ones determined
 - Ordered more now that budget has passed
- MSHA/OSHA
 - Working with ARB to establish a procedure to evaluate claims (and appeals) that a VDECS can not be safely installed

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Applicable Enforcement Issues

- Dealers or distributors are removing the substrate for cleaning, and operators are running the vehicles without the filter, which will cause a violation and fine up to \$10,000
- Fleet owners do need to maintain the datalogs of their exhaust profile to show whether their vehicle meets the active or passive regeneration requirements

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Subcommittee Reports

- Fleets
- Diesel Emission Control Strategies
- Outreach
- DOORS
- Safety

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Fleets Subcommittee



Dave Porcher: Chair

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Diesel Emission Control Strategies (DECS) Subcommittee



Charlie Cox: Chair

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Outreach Subcommittee

- Kim Heroy-Rogalski: Chair



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Diesel Off-road On-line Reporting System (DOORS) Subcommittee

Jeff Wilson: Chair

Safety Subcommittee



Beth White: Chair

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Off-Road Contacts

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Off-Road Regulation - www.arb.ca.gov/msprog/ordiesel/ordiesel.htm
Verified Devices - www.arb.ca.gov/diesel/verdev/verdev.htm
Carl Moyer Program - www.arb.ca.gov/msprog/moyer/moyer.htm

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Save the Date

- The next ORIAG Meeting is scheduled for:
 - November 17, 2008
 - CalTrans Building
 - San Diego

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Public Comment Period

Email for sending comments:

onair@arb.ca.gov



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