

## **Appendix C**

### **Comments Received Before 45 Day Comment Period**

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Fleet owners of heavy cranes commented that it cost more to operate a crane than could be generated with a 1,000 mile limit for the low use exemption. A higher mileage threshold for low-use cranes would better enable the fleets to cover their expenses and turn a profit on the equipment. Staff was provided cost information by one heavy crane fleet representative to show the revenue and expenses for heavy cranes that travel 1,000 miles. Detailed in Table C-1 is a copy of the analysis provided to staff and includes the estimated revenues and expenses for a 40 ton crane and a 70 ton crane.

**Table C-1. Estimated Revenues and Expenses by Fleet Representatives**

<b>Totals based on 1,000 miles per year</b>		
<b>Average speed of crane 50 mph</b>		
<b>Miles divided by speed = 20 hours per 1,000 miles</b>		
<b>Fuel Average = 4 miles per gallon</b>		
<b>Income estimate 1,000 miles / 20 hours</b>	<b>40 Ton Crane</b>	<b>70 Ton Crane</b>
Equipment Rate - Per Hour	\$ 220.00	\$ 355.00
20 hours / 1,000 miles	\$ 4,400.00	\$ 7,100.00
<b>Expense</b>		
Registration	\$ 281.00	\$ 379.00
Certification	\$ 375.00	\$ 375.00
Maintenance	\$ 1,950.00	\$ 1,950.00
Permits	\$ 825.00	\$ 825.00
Fuel	\$ 875.00	\$ 875.00
Tires	\$ 1,000.00	\$ 1,000.00
Insurance	\$ 1,120.00	\$ 1,440.00
Labor	\$ 1,740.00	\$ 3,480.00
	\$ 8,166.00	\$ 10,324.00

The estimate shows an estimated 20 hours of operation (and revenue) to travel 1,000 miles assuming a 50 mile per hour average driving speed. The estimate did not include hours or revenue for performing work while stationary for this company.

Staff compared the estimated hours to information previously gathered during the crane investigation performed by CARB in partnership with several crane fleets to understand how these results compared for the overall industry. This information was also used for the emissions inventory as described in Chapter V. According to the crane investigation report, cranes typically operate 13 hours per week and about 10,000 miles per year. Considering 52 weeks per year, cranes operate 676 hours per year. Based on the

speed distribution provided by the industry, the average speed of cranes would be approximately 26.6 mph, resulting in 376 hours per year on road and 300 hour while stationary. The stationary hours was calculated by subtracting the on-road 376 hours from the 676 operation hours. The results suggests that a typical crane averages closer to 70 hours per 1,000 miles travelled and likely would have higher revenue than included in Table C-1.